



2021  
**Semiannual Report  
to Congress**

Office of Inspector General  
1 April – 30 September 2021

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## MESSAGE FROM THE INSPECTOR GENERAL

It is with great satisfaction that I provide this report from the National Geospatial-Intelligence Agency (NGA) Office of Inspector General (OIG) for the period of 1 April through 30 September 2021. During these six months, the OIG continued to discover and eliminate fraud, waste, and abuse and to evaluate and offer recommendations for improving agency programs and processes.

The OIG worked closely with NGA elements to close 10 recommendations, which represent 14% of the audit and inspection recommendations. The OIG has 72 open recommendations, including 26 issued this period. Under the Inspector General Empowerment Act of 2016, OIG continues to expand our use of metrics resulting from recommendations to the agency.

The Audit Division (OIGA) assessed the agency's compliance with the Payment Integrity Information Act and examined NGA's award fee contracts, how well it maintained cybersecurity in the COVID-19 telework environment, and its laptop inventory. Recommendations from these projects focused on improving policies, procedures, and internal controls. OIGA closed four recommendations, reducing the total number of open recommendations by 10%. The division terminated its examination of NGA's use and control of funds for interagency assisted acquisitions but provided its observations to management. OIGA continued to examine the purchase card program and placements and assignments program. The division also continued its oversight of the contract independent auditors' work on NGA's financial statement audit and the evaluation of NGA's adherence to the Federal Information Security Modernization Act of 2014.

The Inspections Division assessed the status of geospatial intelligence standards in the agency, the effectiveness of the NGA's contract writing system, the current promotions program, and implementation of the previous and updated telework policy. The division also successfully underwent an Intelligence Community OIGs external peer review led by the Defense Intelligence Agency. OIGE closed six recommendations, reducing the total number of open recommendations by 19%. The division continues to work on increasing effectiveness and efficiency in the agency's programs and processes. Current inspections include completing the congressionally directed action on classification procedures and assessing the agency's oversight of contractor badges.

The Investigations Division closed 57 cases this period, substantiating 20 cases (35%) involving time and attendance fraud, computer misuse, security, and travel. The division continues to work on several investigations of senior officials. The Fraud Analytics Support Team used data analytics to identify potential misconduct, possible fraud in contracts, and to support OIG business analytic and data visualization efforts.

As always, I remain grateful for the support of the NGA Director, senior leaders, and the agency's exceptional workforce.



Cardell K. Richardson, Sr.  
Inspector General

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## OVERVIEW

The National Geospatial-Intelligence Agency (NGA), as a Department of Defense (DoD) combat-support agency and member of the Intelligence Community (IC), receives guidance and oversight from the DoD, Office of the Director of National Intelligence (ODNI), and Congress. NGA provides cutting-edge geospatial intelligence (GEOINT) to support U.S. national security and defense; offer humanitarian assistance and disaster relief; and inform national policy decisions.

The NGA OIG fulfills its mission by performing independent, objective audits, inspections, and investigations assiduously to strengthen effectiveness, efficiency, and integrity and to detect and prevent fraud, waste, and abuse in the agency's programs and operations.

The OIG conducts its assessments of NGA's worldwide programs and operations in accordance with the Inspector General (IG) Act of 1978 (IG Act), as amended, and in compliance with the standards of the Government Accountability Office (GAO) and the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

The OIG also serves as the principal NGA agent responsible for investigating potential violations of law, rule, or regulation; incidents of gross mismanagement or misconduct; abuse of authority; and denial of due process. Additionally, the OIG functions as NGA's external liaison with federal, state, and local Inspectors General; for congressional oversight of IG related matters; and with external law enforcement agencies, such as the FBI.

## RESOURCES AND ORGANIZATION

The OIG is authorized 61 billets. As of 30 September 2021, 53 employees were on board. The OIG staff is allocated among three core divisions—Audit, Inspections, and Investigations—and a support function—the Plans and Programs Division. The OIG has a dedicated legal counsel who reports directly to the IG.

The Deputy IG leads OIG tactical operations and the IG Career Service (IGCS). The IGCS protects OIG independence in the realms of recruiting, hiring, career development, and promotion. The IGCS's dedicated career service manager—a human resource professional—reports directly to the Deputy IG. The IGCS seeks to strengthen core IG competencies, broaden career opportunities, and safeguard OIG independence.

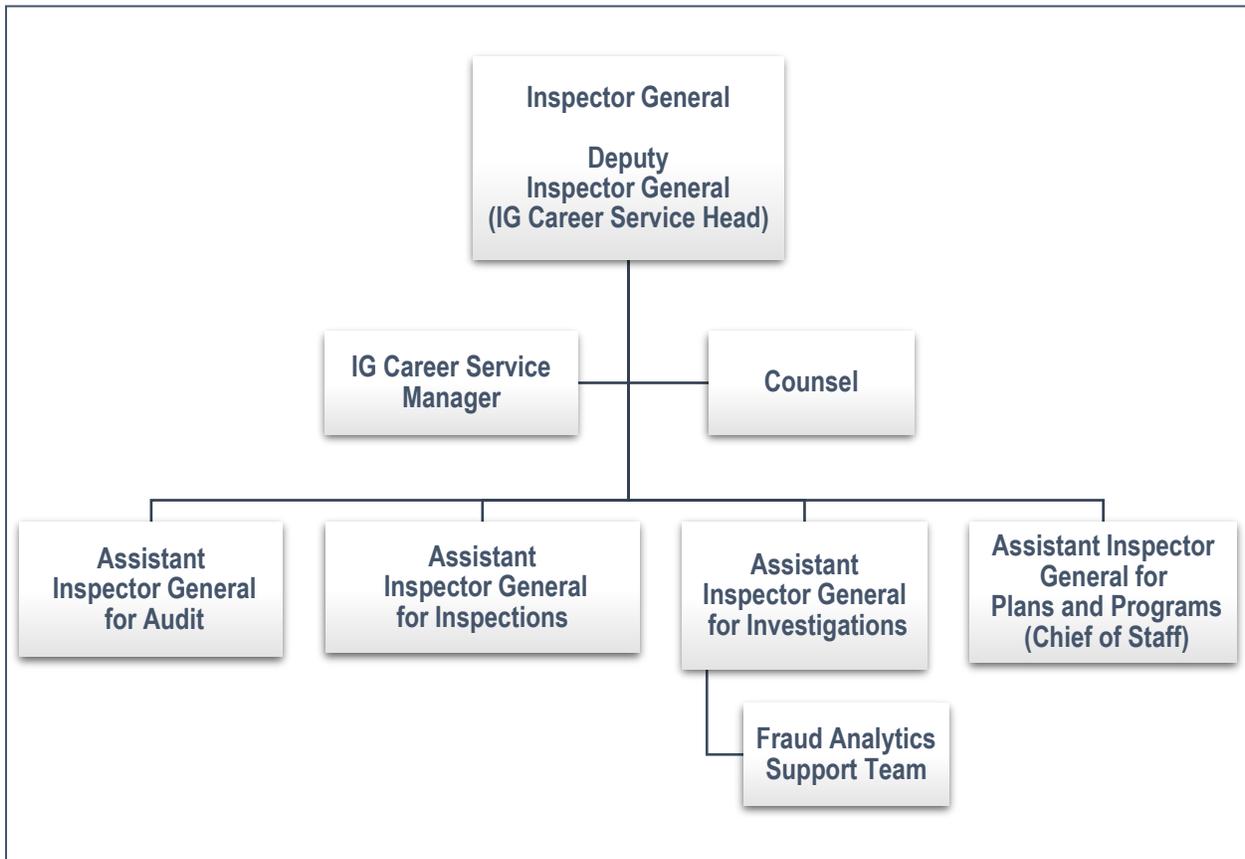
This year, the IGCS focused on creating customized development plans for each OIG employee. These plans enable supervisors and employees to visualize their career progression as individual roadmaps focused on gaining exposure, experience, and educational opportunities. The overall objective is to increase employee sense of belonging and help teammates develop, progress, and advance their careers.

In Spring, NGA's Chief Financial Executive (CFE) included the agency's Office of Mission Oversight and Compliance (MOC) resources within the reported OIG budget in the Congressional Budget Justification Book (CJB), which caused OIG's budget to appear higher than it was. Furthermore, conflating the MOC and OIG budgets and may create confusion regarding the percentage of NGA OIG's budget required by statute to be paid to CIGIE and

could result in inconsistencies within OIG's reports to Congress. For these reasons, the NGA IG requested that the MOC resources not be conflated with OIG's budget in the CBJB. The CFE concurred and reported the MOC resources as a separate subproject from the OIG.

In addition, the OIG succeeded in securing four Defense Intelligence Senior Leader (DISL) allocations from the Under Secretary of Defense for Intelligence & Security. The new DISL positions allowed OIG to upgrade the positions of Chief Counsel to the IG and the Assistant Inspectors General (AIGs) for Audit, Inspections, and Investigations, placing NGAOIG leaders on par with counterparts across the IG Community.

**Figure 1. OIG Organization Chart**



## COUNSEL TO THE INSPECTOR GENERAL

The Counsel to the IG is an in-house legal asset. Counsel provides legal advice directly to the IG and provides legal support to all OIG elements. Counsel reviews all plans, investigations, and final reports for legal sufficiency; provides specialized support to investigators on open cases; manages the OIG legislative and regulatory review; and represents the OIG in litigation arising out of or affecting OIG operations. On behalf of the IG and OIG, the Counsel liaises with, among others, DoD and Inspector General of the Intelligence Community (IC IG) counsels; the DoD OIG (DoDIG), federal and state prosecutors; NGA's Office of General Counsel; and other NGA components.

## AUDIT

The Audit Division (OIGA) provides independent and objective audits and promotes the effectiveness, efficiency, and accountability of NGA programs and operations. Audits are conducted in accordance with generally accepted government auditing standards and the IG Act, as amended. Audit findings and recommendations seek to reduce costs; improve overall performance; and eliminate fraud, waste, and abuse. The recommendations resulting from the projects offer insight for management, help improve internal controls, and ensure compliance with laws, regulation, and policy.

## INSPECTIONS

The Inspections Division (OIGE) is responsible for evaluating, reviewing, and analyzing NGA's programs and activities, including authorities, policies, procedures, and controls. The division independently assesses the reliability of information, compliance with regulations and policies, management of resources, and achievement of program results. The division conducts inspections in accordance with CIGIE *Quality Standards for Inspection and Evaluation* and the IG Act, as amended, and provides information that is timely, credible, and useful for agency managers, policymakers, and others. The recommendations resulting from the projects offer insight for management and help improve effectiveness and efficiency of agency operations and programs.

## INVESTIGATIONS

The Investigations Division (OIGI) conducts independent administrative and criminal investigations of complaints and other information of possible violations of criminal and civil law. The division is the principal NGA agent for investigating potential violations of rule or regulation, incidents of gross mismanagement or misconduct, abuse of authority, and denial of due process. The Investigations Division closed 57 cases this period, substantiating 20 (35%) cases involving false claims, employee misconduct, conflicts of interest, and reprisal.

The division also includes the Fraud Analytics Support Team (FAST), which conducts an agency-wide fraud detection program using data mining and forensic analyses tools. FAST also identifies policy violations and weaknesses in internal and management controls. FAST refers systemic findings to the Inspections Division or Audit Division for further analysis and review. Funds recovered from time and attendance fraud, contractor labor mischarging, and contractor self-disclosure cases are returned to the U.S. Treasury.

The Counsel to the IG completed an internal review of OIG investigative processes and procedures, with an emphasis on whistleblower reprisal cases. The review made process and resource recommendations to the investigative processes. A plan of action and milestone will be prepared to address the reports' recommendations, including revisions to the Investigative Manual.



## SUMMARIES OF AUDITS

As of 30 September, the Audit Division (OIGA) completed five projects and has four ongoing projects.

### COMPLETED

#### **Assessment of NGA's Compliance with the Payment Integrity Information Act of 2019 (PIIA) for Fiscal Year 2020, Memorandum U-053-21/OIG, issued 9 April 2021**

*Overview.* The objective of the assessment was to determine whether NGA was compliant with PIIA for FY 2020.

*Findings.* OIGA concluded that NGA was compliant with PIIA for FY 2020.

*Results.* OIGA made no recommendations for corrective actions.

#### **Audit of NGA's Award Fee Contracts, Report No. OIGA 21-08, issued 14 July 2021**

*Overview.* The objective of this audit was to assess NGA's management of award fee contracts. Specifically, the audit evaluated the adequacy and appropriateness of the process used to assess contractor performance, justification for fees awarded, and obligation of award fees.



*Findings.* NGA's documentation of the process to assess contractor performance and to justify fees awarded was not always adequate and appropriate. For the contracts OIGA reviewed, award fee plans used as the basis for NGA's assessment of contractor performance were not consistently prepared and executed in accordance with federal and NGA requirements. NGA did not always have adequate and appropriate documentation to justify award fees. There was no evidence that NGA assessed whether

award-fee incentives enhanced contractor performance. The effects of NGA's lack of compliance with the federal regulations and NGA policies and procedures for the development of the award-fee plans and the maintenance of award-fee documentation are that NGA risks inadequately and inappropriately assessing contractor performance and justifying fees awarded. The agency may be at risk of contractors not meeting the desired program outcomes associated with the award fees. NGA cannot support that award fees are being used effectively to motivate contractors to improve performance and achieve desired program outcomes. OIGA did find that NGA's obligations for award fees for the five sample contracts complied with DoD requirements and were adequate and appropriate.

*Results.* OIGA made five recommendations to improve NGA's management of award fee contracts. These recommendations relate to developing or updating procedures to improve the processes for documenting reviews and approvals of award fees and strengthening internal controls over these processes.

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## **Audit of Maintaining Cybersecurity in the COVID-19 Telework Environment, Report No. OIGA 21-09, issued 25 August 2021**

*Overview.* The OIG contracted KPMG LLP, an independent public accounting firm, to audit NGA's maintenance of cybersecurity in the COVID-19 telework environment in conjunction with KPMG's FY 2021 Federal Information Security Modernization Act (FISMA) evaluation. The audit objectives were to determine (1) whether change control, acquisition and procurement, and risk management processes for system enhancements made to promote telework capabilities, including new software and the migration of information systems from the classified to unclassified networks, were in accordance with federal, DoD, and NGA requirements; (2) whether NGA conducted exercises to test the effectiveness of telework security training, including exercises in security awareness training, in accordance with federal, DoD, and NGA requirements; and (3) whether NGA identified minimum security configuration requirements for remote connections and implemented controls to prevent and monitor for remote connections that did not meet defined requirements in accordance with federal, DoD, and NGA requirements.

*Findings.* KPMG noted that NGA took action or designed and implemented controls related to each audit objective to reduce the elevated threat to NGA's network of cybersecurity attacks due to the increase in telework and remote connections. However, KPMG found that NGA did not define a configuration management policy to reflect the current operating environment; perform phishing exercises consistently; and document, formalize, and implement policies for minimum hardware and software security configuration requirements for remote access. Weaknesses in telework cybersecurity internal controls could negatively impact the confidentiality, integrity, and availability of NGA data and information systems.

*Results.* KPMG issued two new recommendations and reissued one recommendation in conjunction with the FY 2021 FISMA evaluation to strengthen telework cybersecurity internal controls. The recommendations focus on developing policies and procedures for configuration management and continuing to perform phishing exercises.

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## **Audit of NGA's Laptop Inventory, Report No. OIGA 21-10, issued 29 September 2021**

*Overview.* The objective of this audit was to determine whether all laptops were accurately accounted for in accordance with federal, DoD, and NGA requirements.

*Findings.* Existing NGA requirements direct laptop inventory management from acquisition through final disposition; however, OIGA found that laptops were not accurately accounted for in accordance with those requirements. Specifically, OIGA found deficiencies in laptop acquisition; inventory; disposal documentation; and lost, damaged, destroyed reporting. Without effective laptop acquisition, inventory, and disposal controls, NGA may be unable to identify all laptops acquired, in-service and accounted for, inventoried, or disposed of, which increases the risk of monetary damage, theft, or data spillage.

*Results.* OIGA made five recommendations to improve the management of NGA's laptop inventory. The recommendations relate to compliance with existing NGA requirements for laptop inventory management from acquisition through final disposition.



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## **Audit of NGA’s Use and Controls of Funds for Interagency Acquisitions, Memorandum U-173-21/OIG, issued 15 September 2021**

*Overview.* The objectives of this audit were to determine whether NGA complied with applicable laws and regulations related to the use and control of funds for interagency acquisitions. Specifically, OIGA was to have assessed the procedures NGA used to provide, receive, and monitor funding to other defense and non-defense agencies. In addition, OIGA was to have determined whether NGA implemented adequate procedures for issuing, recording, reviewing, and reporting financial information related to interagency acquisitions.

*Findings.* OIG could not complete audit procedures because the NGA Financial Management Directorate (FM) was unable to provide complete and timely support due to competing demands of the legislatively mandated financial statement audit and challenges with staffing its audit support contract. Because of these challenges, FM requested that OIGA postpone the audit. However, OIGA determined it was not feasible to postpone the audit because of the potential impact to other planned activities and decided to terminate the project. OIGA plans to revisit this topic in a future annual work plan.

*Results.* Based on partial completion of audit procedures, OIGA identified exceptions on incoming requests related to determination and findings documentation, funding documents, and trading partner agreements. On outgoing requests, OIGA identified exceptions related to agreement format and coordination, approval and acceptance of military interdepartmental purchase requests, and trading partner reconciliations. OIGA issued a termination memorandum to communicate these observations for management’s information and use.

## **ONGOING**

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### **Audit of NGA’s Purchase Card Program, Project No. 20-A07**



*Overview.* The objectives of this audit are to determine whether (1) NGA’s internal controls over the purchase card program are properly designed and implemented and operating effectively to prevent abuse or misuse; and (2) whether NGA government purchase card transactions are valid, properly authorized, and supported.

*Status.* The project, announced in March 2020, is 95% complete. OIGA plans to issue a report in November 2021.

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### **Audit of NGA’s Placements and Assignments Program, Project No. 21-A01**

*Overview.* The objective of this audit is to assess whether the development and implementation of NGA’s Placements and Assignments Program achieves program goals effectively and efficiently and supports related NGA plans for the workforce.

*Status.* The project, announced in October 2020, is 80% complete. OIGA plans to issue a report in December 2021.

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## Audit of the NGA Financial Statements for FY 2021, Project No. 21-A03

*Overview.* OIGA contracted KPMG LLP, an independent public accounting firm, to audit NGA’s FY 2021 financial statements. The audit objective is to determine whether NGA’s financial statements are presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles. To meet requirements for federal financial statement audits, KPMG is also assessing internal control over financial reporting and performing tests to determine whether NGA complied with applicable provisions of laws, regulations, contracts, and grant agreements.

KPMG is following up on the status of management’s corrective actions to address the findings and recommendations communicated in the Independent Auditors’ Report on the NGA Financial Statements for FYs 2020 and 2019 (Report No. OIGA 21-03), and the Independent Auditors’ Management Letter for the FY 2020 Financial Statement Audit (Report No. OIGA 21-05).

*Status.* The project, announced in February 2021, is 70% complete. KPMG’s report will be issued no later than 15 November 2021. If necessary, OIGA will issue a management letter by 31 December 2021.

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## FY 2021 FISMA Evaluation of the NGA Information Security Program, Project No. 21-A05

*Overview.* The OIG contracted KPMG LLP, an independent public accounting firm, to perform the FY 2021 evaluation required by FISMA. The overall objectives of the evaluation are to assess NGA’s information security program in accordance with the IG FISMA reporting metrics issued by the Department of Homeland Security and determine whether NGA implemented recommendations from the prior year’s evaluation. The evaluation will include testing a sample of information systems to support the IG metrics.

*Status.* The project, announced in February 2021, is 75% complete. OIGA plans to issue the final external metrics report to the IC IG in October 2021 and the detailed internal report to NGA management in November 2021.



## SUMMARIES OF INSPECTIONS

As of 30 September, the Inspections Division (OIGE) has completed five inspections and has two ongoing inspections.

### COMPLETED

#### **Inspection of NGA's Application of Classification, Report No. QL-21-04**

*Overview.* OIG has initiated a quick look inspection of the NGA's application of classification. This inspection is a congressionally directed action announced in National Defense Authorization Act for Fiscal Year 2020, Public Law 116-92, § 6721, 20 December 2019. This inspection has three objectives: evaluate the accuracy of NGA's application of classification and handling markers on a representative sample of finished reports, including such reports that are compartmented; evaluate NGA's compliance with declassification procedures; and evaluate the effectiveness of NGA's processes for identifying topics of public or historical importance that merit prioritization for a declassification review.

*Findings.* NGA applied classification and handling markers on finished reports accurately, with the exception of some overgraded and undergraded portion markings. These exceptions did not affect the overall classification of finished reports. Undergrading portion markings related to target references and sourcing could potentially result in the loss of targets and in changes to the behavior of adversaries. However, based on the agency's classification guidance, only three of the 35 reports reviewed (8.57%) had such a discrepancy. NGA is also generally compliant with IC, DoD, NGA, and National Archives and Records Administration guidance for declassification. However, during FY 2020, multiple mandatory declassification reviews were not completed within the required 365-day timeline because of the impact of COVID-19 on the availability of the workforce and the closure of the National Declassification Center.

*Results.* The report made two recommendations to the agency designed to improve NGA's classification of finished reports and the agency's declassification procedures. The recommendations focus on improving internal controls related to classification and declassification management to ensure NGA complies with IC, DoD, and federal rules and regulations.

#### **Inspection of GEOINT Standards, Report No. OIGE 21-07**

*Overview.* The NGA Director, as GEOINT Functional Manager (GFM), established the National System of Geospatial-Intelligence (NSG) GFM Standards Assessment program, which defines and implements NSG methods and processes to assess and assert information technology (IT) and National Security Systems conformance with GEOINT data and service standards within the DoD and the IC. During the 2019 annual planning process, OIGE learned of potential negative effects resulting from NGA Career Services manpower initiatives and constrained contract funding for the GEOINT Standards Program. Management raised concerns that the Career Services initiatives created a critical shortfall in qualified cadre. Additionally, OIGE learned of concerns regarding possible reductions to the GEOINT standards-related contract funding. The

overall objective of the inspection was to assess whether the GEOINT Standards Program was organized, staffed, and resourced to effectively fulfill its GFM responsibilities.

*Findings.* NGA is not meeting the GEOINT standards requirements established in 50 U.S.C. § 3038, and DoD Directive (DODD) 5105.60, National Geospatial-Intelligence Agency (NGA). The inspection found that NGA is not organized effectively, with multiple positions located in diverse NGA components. The GEOINT Standards Program also experienced staffing and budget cuts, which have resulted in program deficiencies that have impacted the agency's ability to effectively adopt, adapt, and develop GEOINT standards in a timely manner to support mission critical needs. This failure to meet established requirements resulted in increased enterprise costs and decreased capabilities.

*Results.* The report contains six recommendations designed to prioritize and improve the resourcing and enforcement of GEOINT standards and the organization of elements responsible for GEOINT standards development and implementation. OIG recommended that NGA evaluate its use of authority, derived from DoDD 5105.60, to compel NSG elements to implement GEOINT standards and address any gaps. The agency will submit an annual GEOINT standards report identifying the goals, objectives, and accomplishments of NGA's GEOINT standards elements to assist with the reporting requirements outlined in DoDD 5105.60. The agency will also implement a process to ensure that NSG components comply with NSG directives.

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### **Inspection of NGA's Telework Policy, Report No. OIG Q-21-06**

*Overview.* OIG conducted several phased inspections evaluating NGA's planning, preparedness, response, and recovery during the COVID-19 pandemic. These inspections informed leadership and provided opportunities to improve on NGA's future pandemic and emergency responses. The first of five reviews focused on the agency's telework policy and posture. The objectives of this inspection were to determine and evaluate NGA's telework policy posture prior to the COVID-19 pandemic and to determine and assess NGA's application of U.S. Government telework policy in response to the COVID-19 pandemic.



*Findings.* NGA did not maximize its use of telework prior to the COVID-19 pandemic because of many multifaceted barriers, including a lack of both planning and impact analysis, a dependence on in-facility work owing to classified program requirements, inaccessibility of major systems of record capabilities from the unclassified environment, and a lack of understanding on the use of telework among supervisors and employees. While the workforce used routine (regular and recurring) and ad hoc (situational) telework before the pandemic, telework use was not widespread and was limited primarily to specific programs, such as reasonable accommodations. By not maximizing telework, the agency was not taking advantage of the significant benefits and cost savings the inspection identified that NGA could have received by maximizing telework within the Federal Government. NGA did successfully transition to a mass telework posture when driven by the COVID-19 pandemic. The agency identified shortfalls and gaps in the agency's previous telework policy and addressed these shortfalls and gaps in an updated instruction, which will allow the agency to further maximize telework in future emergencies.

*Results.* OIG made two recommendations to assist the agency in planning and implementing telework in the future, including publishing program guidance that outlines best practices to assist components with maximizing telework and implementing mass telework during future pandemics and emergencies, and addressing long distance (remote) telework. Additionally, OIG recommended that the agency update supervisor and employee training to ensure it addresses gaps in the application of telework.

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### **Inspection of NGA’s Contract Writing System, Report No. OIGE 21-05**

*Overview.* NGA contract data must be completed and tracked in a searchable system. Currently, NGA contract data is housed in a system called PRISM. OIGE received complaints that contract data was incomplete and kept on manual spreadsheets. In addition, the NGA Office of Contract Services (OCS) and program offices could not effectively track, obtain metrics on, and evaluate contracts during their lifecycles without a standardized contract writing system. The overall objective of this inspection was to determine whether NGA’s contract writing system delivered the capability to provide adequate contract data for principal users. Specifically, OIGE wanted to determine whether the current NGA contract writing system allowed for sufficient storage, discoverability, and retrieval of required contract documentation and whether the planned system adequately stored, managed, and made accessible all required contract information as required by the Federal Acquisition Regulations System, 48 C.F.R. Subpart 4.8—Government Contract Files.

*Findings.* The agency’s current contract writing system does not allow for sufficient storage, discoverability, and retrieval of required contract documentation and does not meet user needs. It also requires intensive manual effort to input contract data. The current system was acquired in the 1990s and has been awarded as a sole-source, noncompetitive contract since 2002. The agency was in the process of replacing the current system when NGA received congressional marks in December 2020 against its funding request, which placed the agency’s effort on hold. Although these marks directly impact funding for a new system in 2021, the agency continues to plan for replacing the current system with an up-to-date system; however, no timeframe has been identified.

*Results.* OIG made one recommendation, which included that the agency establish a timeline, with specific milestones, to replace NGA’s current contract writing system with an up-to-date system, designate an office of primary responsibility for each milestone, and develop a plan to coordinate requirements for the new system across each directorate involved.

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### **Inspection of the NGA Promotion Process, Report No. OIGE 21-04**

*Overview.* NGA completed the implementation of its new promotion process in 2019, which differed significantly from the previous process. The overall objective of this inspection was to determine whether the promotion process was effective and efficient and to evaluate the Human Development Directorate’s (HD’s) oversight of the process. Specific subobjectives were to assess the process to ascertain any needed improvements, its cost effectiveness in terms of money and manpower, and whether HD’s measures of success mapped to the NGA’s strategic goals, as listed in NGA Strategy 2025: Goal 1: People, Goal 2: Partnerships, Goal 3: Mission Today, and Goal 4: Mission Tomorrow.

*Findings.* The agency is not analyzing or measuring the overall impact of changes to the promotion process; therefore, no overall process improvements could be determined. Prior to each new cycle, HD modified the process, but never analyzed modifications to determine their impact on the overall process. The results of the inspection also showed that HD was not collecting metrics to determine the costs in terms of personnel or time engaged in the promotion process; therefore, the process could not be analyzed for effectiveness or efficiency.

*Results.* OIG made two recommendations including developing a plan to measure and analyze the impact of changes on the promotion process, and developing meaningful metrics to measure the cost effectiveness and efficiency of the promotion process and coordinate these metrics across all participating agency directorates.



## ONGOING

### Inspection of NGA's Security and Installations (SI) Contractor Badging Process, Project No. QL-21-02

*Overview.* OIG has initiated a quick look inspection of the SI contractor badging process. The overall objective of this inspection is to determine SI's program, processes, and activities controlling contractor badge issuance and turn-in.

*Status.* The project was announced on 25 February 2021. OIG expects to publish the report in November 2021.



### Inspection of NGA's Application of Pay Caps for Deployment and Overtime Pay, Project No. QL-21-06

*Overview.* Deployers receive opportunities for overtime and premium pay while serving on a deployment. Because of salary, sometimes their biweekly and overall pay can be subject to pay limits or caps. The overall objective of the inspection is to determine whether pay caps are accurately applied in the cases of deployment and overtime pay.

*Status.* The project was announced on 9 July 2021. OIG expects to publish the report in October 2021.

## SUMMARIES OF INVESTIGATIONS

As of 30 September, the Investigations Division (OIGI) closed 57 cases and substantiated 20 cases (35%). The division also opened 39 new cases and has 48 ongoing investigations.

### JUDICIAL ACTIONS AND PROSECUTIONS.

OIGI has nothing to report during this period.

### CASES INVOLVING SENIOR GOVERNMENT OFFICIALS (SUBSTANTIATED)

OIGI has ten pending investigations on senior officials. During this period, OIGI completed one investigation that substantiated allegations against a senior government official. OIGI provided the DoDIG the required notification of these allegations and cases.

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#### **OIG Case No. 21-021, closed September 2021**

OIGI investigated allegations that an NGA senior official violated policies and procedures by allowing a part-time employee to work full-time hours and receive locality pay at the wrong rate. In addition, it was alleged that the senior official showed the employee favoritism regarding the Voluntary Early Retirement Authority and Voluntary Separation Incentive Payments (VERA/VSIP).

The investigation substantiated the first allegation; however, it did not substantiate the second or third allegations. The senior official received an oral admonishment.

### CASES INVOLVING SENIOR GOVERNMENT OFFICIALS (UNSUBSTANTIATED)

The DoDIG was provided appropriate notification of the following allegations and cases.

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#### **OIG Case No. 19-032, closed April 2021**

OIGI investigated allegations that an NGA senior official had inappropriate relationships with two subordinate employees, misused her position to influence various personnel actions for the same two subordinate employees, and accepted an improper gift from one of the subordinate employees. The investigation did not substantiate the allegations.

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#### **OIG Case No. 20-068, closed June 2021**

OIGI investigated allegations that an NGA senior official abused her authority by threatening members of her staff during a meeting. The investigation did not substantiate the allegation.

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**OIG Case No. 21-015, closed April 2021**

OIGI conducted an inquiry into an allegation that an NGA senior official had an inappropriate relationship with a subordinate employee. The inquiry did not find any evidence to substantiate the allegation.

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**OIG Case No. 21-032, closed July 2021**

OIGI received allegations that a senior government official violated the Tandem Couple Assignment Program policy and possibly reprised against a subordinate employee for requesting a review of the policy. Details of the allegations were referred to the DoDIG's Investigations of Senior Officials office for review and action. DoDIG ISO evaluated the complaint and dismissed the allegations because they found no indication of misconduct.

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**WHISTLEBLOWER RETALIATION**

OIGI closed three whistleblower reprisal cases, which are summarized below.

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**OIG Case No. 20-015, closed April 2021**

OIGI investigated an allegation that two supervisors reprised against a subordinate employee in the form of a position reassignment after the employee sent a protected disclosure via email alleging that staffing certain billets would constitute fraud, waste, and abuse. The OIGI investigation did not substantiate the reprisal allegation and found that the intent to remove the employee from his assignment had been communicated to the employee's supervisors a month before the employee made his protected disclosure.

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**OIG Case No. 20-031, closed June 2021**

OIGI investigated an allegation that a supervisor retaliated against a subordinate employee by lowering the employee's performance evaluation score after the employee made a protected disclosure to division leadership that the supervisor created a hostile work environment. The OIGI investigation did not substantiate the retaliation allegation and found that the employee would have received the same performance evaluation score absent the protected disclosure. Of note, the employee pursued the informal, formal, and final reconsideration processes and the score was upheld.

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**OIG Case No. 21-014, closed June 2020**

OIGI investigated allegations that two supervisors reprised against a subordinate employee by counseling him, giving him a successful instead of excellent performance evaluation score, and denying his informal reconsideration after the employee made protected disclosures about enforcing safety precautions. The OIGI investigation did not substantiate the reprisal allegations and found that the employee would have received the same discipline and performance evaluation score absent the protected disclosure.

## CONTRACTOR LABOR MISCHARGING

OIGI continued to address matters of significant time and attendance fraud and contractor labor mischarging through investigations. Many lesser time and attendance issues are handled directly with management, which ensures that recovery of funds and other remedies are accomplished. Many low-dollar contractor labor mischarging issues are handled directly with NGA contractor officers to recover funds and have the offenders removed from NGA. Summaries of two cases involving labor mischarging by contractors follows.



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### **OIG Case No. 21-065, closed September 2021**

A contract company disclosed that one of its contract employees mischarged the government. The contract company reimbursed the government \$169,684.37 and terminated the employee.

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### **OIG Case No. 21-054, closed August 2021**

A contract company disclosed that one of its contract employees mischarged the government. The contract company credited the government \$753.32 and terminated the employee.

## OTHER NOTEWORTHY INVESTIGATIONS

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### **OIG Case No. 19-030, closed June 2021**

OIGI investigated allegations that a contract employee acted in a manner inconsistent with NGA procedures, the NGA Performance Work Statement, and a Federal Handbook while performing his duties. The OIGI investigation substantiated the allegations. The contract employee was terminated for these unethical practices.

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### **OIG Case No. 19-153, closed April 2021**

OIGI investigated allegations that a Pay Band 3 employee misused government resources to conduct a personal business. The investigation developed evidence that the employee violated 5 C.F.R. § 2635.101, Basic obligation of public service; 5 C.F.R. § 2635.704, Use of Government property; 5 C.F.R. § 2635.802, Conflicting outside employment and activities; and NGA Instruction (NGAI) 8470.2, Acceptable Use of Information Technology Resources. Forensics examinations showed the employee utilized the government information systems to further his personal business efforts. The employee received a 30-day suspension without pay and signed a Last Chance Agreement, in which he agreed to accept the suspension and waive any right of appeal if he violated the agreement in the future.

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### OIG Case No. 20-085, closed April 2021

OIGI investigated an allegation that a Pay Band 3 employee misused government resources to access content that was not mission related. The investigation developed evidence that the employee violated 5 C.F.R. § 2635.101, 5 C.F.R. § 2635.704, and NGAI 8470.2.

The employee and his two supervisors received oral admonishments; the division was scheduled for retraining on computer misuse.

## CRIMINAL INVESTIGATIONS

During this period, OIGI worked on investigations with the Defense Criminal Investigative Service (DCIS), other criminal investigative agencies, and Department of Justice attorneys. The issues included false claims, cost mischarging, post-government employment violations, theft of government funds, and conflicts of interest.



## FRAUD ANALYTICS SUPPORT TEAM

FAST is leveraging data science to detect and deter fraud, waste, and abuse and to provide forensic analysis support to the OIG. FAST provides the basis for restitution and recovery of dollars lost to fraud, waste, and abuse so that corrective actions can be taken to address employee misconduct.

### COMPLETED

#### **Proactive Contract Fraud Detection Model, Project No. F20-003**

Contracts pose one of the highest risks for fraud at NGA. In response, FAST initiated an annual review of NGA contracts. The objective of this project was to identify high-risk contracts based on risk rankings derived from available data and outlier detection methods to identify contracts with potential fraud, waste, and abuse. This project was completed in August 2021. As a result of this project, FAST was able to focus on contract labor mischarges. FAST supported 12 contract labor mischarge cases this reporting period. FAST closed six cases as not substantiated. Six cases remain active.



#### **FY 2021 NGA OIG Strategic Implementation Plan Dashboard, Project No. F21-001**

FAST developed an information dashboard to track the implementation of OIG's strategic goals. The dashboard captures key performance indicators associated with each goal, helps ensure on-time delivery of strategic objectives, and enables executive decision making. This project was completed in September 2021.

#### **FY 2021 NGA OIG Open Recommendations Dashboard, Project No. F21-003**

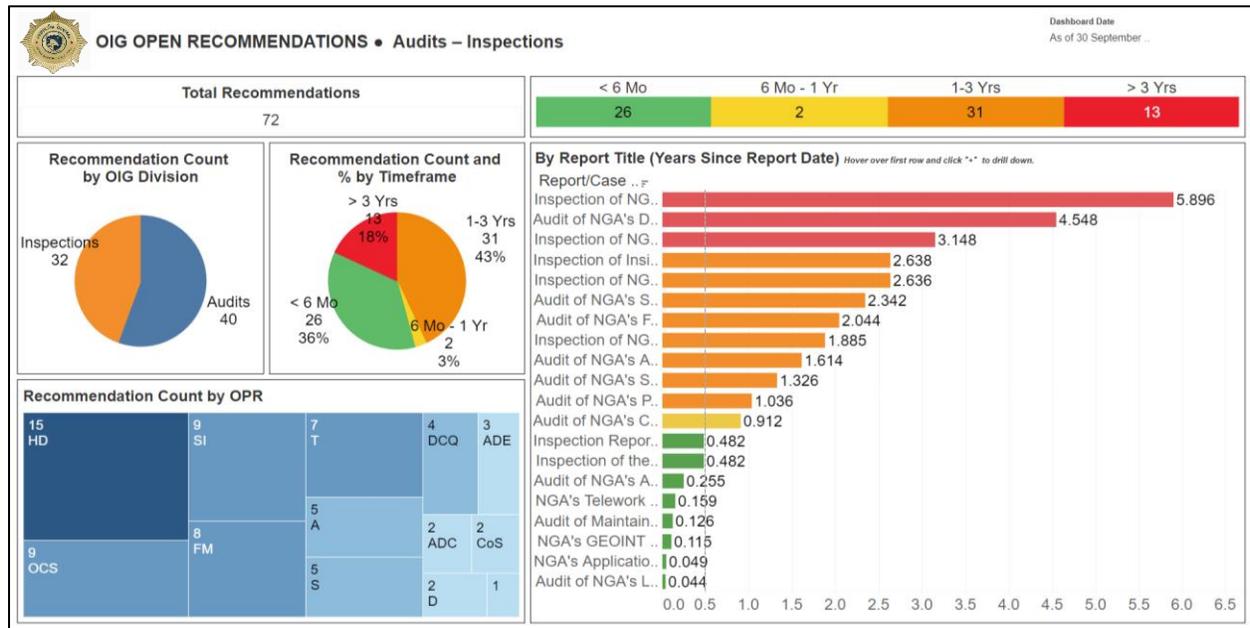
FAST and OIGA developed a visual dashboard and a SharePoint tracker to update NGA and OIG management on the status of OIG FY 2021 open recommendations and to call decision makers' attention to high priority areas. The dashboard and tracker will improve overall agency accountability, transparency, communication, and partnership as it relates to the results of OIG audits, inspections, and investigations.

The dashboard and tracker identify identifies the number of open recommendations by OIG division and NGA office of primary responsibility. Seventy-two recommendations are currently open. During the reporting period, NGA and OIG management opened 26 new recommendations and closed 10 for a net of 16 (29%) additional open recommendations above the previously reported total of 56. The number of recommendations open for between three and five years increased from five to 13. NGA and OIG management will continue working together to address the remaining open recommendations.

Figure 2. Analysis of Open Recommendations from 1 April to 30 September 2021

Open Recommendations				
1 April → 30 September 2021				
Total	56 → 72	25%	↑	Opportunity
1-3 yrs.	39 → 31	21%	↓	Good
3-5 yrs.	5 → 13	260%	↑	Opportunity

Figure 3. Open Recommendations Dashboard as of 30 September 2021



## ONGOING

### **Proactive Government Travel Charge Card (GTCC) Analytics, Project No. F20-006**

The OIG FAST will perform an annual review of GTCC transactions made in FY 2019 for indicators of misuse. FAST will refer misuse cases to management for action and to NGA's GTCC Team for remedial action. This project will be expanded to include FY 2020 and FY 2021 transactions. This project is expected to be completed by March 2022.



### **Paycheck Protection Program Loan Fraud Proactive Project, Project No. F20-010**

FAST is currently collaborating with DCIS to develop a model to proactively detect Paycheck Protection Program fraud by NGA contracting companies. This project is expected to be completed by March 2022.

## NEW

This reporting period, FAST transitioned to business analytics and visualization in support of OIG strategic goals. Because of staff attrition, FAST did not initiate new proactive projects this reporting period.

## APPENDIX A. STATUS OF AUDIT AND INSPECTION RECOMMENDATIONS

This appendix includes seven tables that present the status of recommendations according to various parameters.

**Table A-1. Open and Closed OIG Recommendations as of 30 September 2021**

This table provides the number of NGA OIG and DoDIG audit and inspection recommendations issued to NGA management that were closed or remained open at the end of the reporting period. This table does not include recommendations from the financial statement audit (33 open) or the FISMA evaluation (38 open) or that closed prior to 1 April 2021.

Report Title, Report Number, Date	Recommendations	
	No. Closed	No. Open
<b>Audit of NGA’s Disposal of Electronic Waste, Report No. OIGA 17-06, March 2017</b>	1	2
Objective: To determine whether NGA sanitized and disposed of e-waste in accordance with IC, DoD, and NGA policies and procedures.		
<b>Audit of NGA’s Support to U.S. Strategic Command (STRATCOM) Mission Requirements, Report No. OIGA19-06, June 2019</b>	0	5
Objective: To determine whether NGA effectively and efficiently satisfied STRATCOM requirements.		
<b>Audit of NGA’s Funds Reprogramming Activity, Report No. OIGA19-07, September 2019</b>	0	4
Objectives: To (1) assess NGA funds reprogramming activity for gaps in compliance with applicable laws, regulations, policies, and procedures and (2) provide information on the root cause of reprogramming activities.		
<b>Audit of NGA’s Analysis Event Response for National Security and Natural Disasters, Report No. OIGA 20-05, March 2020</b>	1	6
Objective: To determine whether Analysis component-related crisis and event response plans were in place, executed, and managed effectively. Specifically, OIGA determined whether the execution and management of those plans facilitated coordination among stakeholders, standardization of procedures where practical, reduction in duplication of efforts, and efficient allocation of available resources.		
<b>Audit of NGA’s Supply Chain Risk Management (SCRM), Report No. OIGA 20-06, June 2020</b>	1	4
Objective: To determine whether the NGA SCRM program was effectively managed in accordance with federal law, DoD, IC, and other applicable policy and guidance.		

Report Title, Report Number, Date	Recommendations	
	No. Closed	No. Open
<b>Audit of NGA’s Permanent Duty Travel Program, Report No. OIGA 21-01, October 2020</b>	1	4
Objective: To determine the effectiveness and efficiency of NGA’s permanent duty travel program. Specifically, the audit will determine whether NGA complied with applicable laws and regulations governing reimbursement for permanent duty travel.		
<b>Audit of NGA’s Contractor Personnel Qualifications, Report No. OIGA 21-04, November 2020</b>	0	2
Objective: To determine whether NGA ensures its contractors provide qualified personnel commensurate with labor category requirements and rates established in their contracts.		
<b>Audit of NGA’s Award-Fee Contracts, Report No. OIGA 21-08, July 2021</b>	0	5
Objective: To assess NGA’s management of award-fee contracts. Specifically, the audit was to evaluate the adequacy and appropriateness of the process used to assess contractor performance, justification for fees awarded, and obligation of award fees.		
<b>Audit of Maintaining Cybersecurity in the COVID-19 Telework Environment, Report No. OIGA 21-09, August 2021</b>	0	3
<i>Objectives:</i> To determine (1) whether change control, acquisition/procurement, and risk management processes for system enhancements made to promote telework capabilities, including new software and the migration of information systems from the classified to unclassified networks, were in accordance with federal, DoD, and NGA requirements; (2) whether NGA conducted exercises to test the effectiveness of telework security training, including exercises in security awareness training in accordance with federal, DoD, and NGA requirements; and (3) whether NGA identified minimum security configuration requirements for remote connections and implemented controls to prevent and monitor for remote connections that did not meet defined requirements in accordance with federal, DoD, and NGA requirements.		
<b>Audit of NGA’s Laptop Inventory, Report No. OIGA 21-10, September 2021</b>	0	5
Objective: To determine whether all laptops were accurately accounted for in accordance with federal, DoD, and NGA requirements.		
<b>Inspection of NGA’s Acquisition Function, Phase II: Human Capital, Report No. OIGE 16-03, November 2015</b>	0	1
Objectives: To review NGA’s acquisition human capital policies and practices to evaluate whether NGA has developed and maintained a fully proficient acquisition workforce that is flexible and highly skilled across a range of management, technical, and business disciplines as outlined in the Office of Management and Budget’s (OMB’s) assessment guide. The subobjectives were to determine (1) whether NGA is conducting effective strategic human capital planning and (2) whether NGA is effectively and efficiently acquiring, developing, and retaining acquisition talent.		

Report Title, Report Number, Date	Recommendations	
	No. Closed	No. Open
<b>Review of the NGA Insider Threat Program, Report No. OIGE 16-05, February 2016</b>	1	0
Objectives: To determine whether NGA’s Insider Threat Program complies with executive branch, DoD, and IC requirements. The subobjectives were aligned with the following six minimum standards established by the National Insider Threat Policy: (1) designation of senior official(s) and associated responsibilities; (2) information integration, analysis, and response; (3) insider threat program personnel; (4) access to information; (5) monitoring user activity on networks; and (6) employee training and awareness.		
<b>Inspection of NGA’s Medical Services, Report No. OIGE 18-05, August 2018</b>	0	10
Objective: To assess the effectiveness, efficiency, and compliance with oversight requirements of NGA’s medical services, including the deployer program, during the period of 2014 to 2017.		
<b>Inspection of NGA’s Insider Threat Program Case Management, Report No. OIGE 19-01, February 2019</b>	2	5
Objective: To assess the NGA Insider Threat Program’s processes and procedures used for managing cases and complying with applicable laws and DoD and IC policies.		
<b>Inspection of NGA’s GEOINT Services Initiative, Report No. OIGE 19-02, February 2019</b>	1	2
Objectives: To assess the effectiveness and efficiency of the implementation of GEOINT Services against IC requirements; agency objectives, plans, and milestones; and assigned responsibilities. Specific subobjectives of the inspection were to determine the extent to which GEOINT Services (1) has been effectively and efficiently implemented, and (2) has effectively and efficiently fulfilled NGA’s designated responsibilities of Geospatial Platform as a Service.		
<b>Quick Look Inspection Report of NGA Outposts, Report No. OIGE 19-05, September 2019</b>	1	0
Objective: To evaluate the effectiveness of the NGA outposts with respect to return on investment.		
<b>Inspection of NGA’s Acquisition Function, Phase III: Policies and Processes, Report No. OIGE 20-01, November 2019</b>	1	1
Objectives: To assess NGA’s acquisition policies and processes to determine the effectiveness and efficiency of the agency’s acquisition program management and compliance with oversight requirements. Specifically, we discovered the agency’s acquisition policies and processes, assessed how well the policies and processes supported the agency’s program managers in performing their duties, and assessed how the policies and processes supported the agency’s ability to assess and monitor its own acquisition performance.		

Report Title, Report Number, Date	Recommendations	
	No. Closed	No. Open
<b>Quick Look Inspection Report of NGA’s Contract Writing System, Report No. OIGE 21-05, April 2021</b>	0	1
Objectives: To determine whether NGA’s contract writing system provides adequate contract data for principal users. The specific sub-objectives were to (1) determine if the current NGA contract writing system sufficiently allows for storage, discoverability, and retrieval of required contract documentation and (2) if the planned (follow-on) NGA contract writing system will adequately store, manage, and make accessible all required contract information.		
<b>Inspection of NGA Promotion Process, Report No. OIGE 21-04, April 2021</b>	0	2
Objectives: To determine whether the current promotion process is effective and efficient, and to evaluate HD’s oversight of the promotion process. Specific subobjectives of the inspection were to (1) assess the NGA promotion process and procedures and determine any needed improvements, (2) determine whether the process is cost effective and efficient in terms of money and manpower, and (3) evaluate HD’s measures of success and determine whether the results map back to the Agency’s strategic goals.		
<b>Quick Look Inspection of NGA’s Telework Policy, Report No. OIGE 21-06, August 2021</b>	0	2
Objectives: To determine and evaluate NGA’s telework policy posture prior to the COVID-19 pandemic, and to determine and assess NGA’s application of U.S. Government telework policy in response to the COVID-19 pandemic.		
<b>Inspection of NGA’s GEOINT Standards Program, Report No. OIGE 21-07, September 2021</b>	0	6
Objectives: To assess whether NGA effectively organized, staffed, and resourced its GEOINT Standards Program to fulfill the program’s designated responsibilities.		
<b>Inspection of NGA’s Application of Classification for Fiscal Year 2020, Report No. OIGE 21-08, September 2021</b>	0	2
Objectives: Evaluate the accuracy of NGA’s application of classification and handling markers on a representative sample of finished reports, including such reports that are compartmented; evaluate NGA’s compliance with declassification procedures; evaluate the effectiveness of NGA’s processes for identifying topics of public or historical importance that merit prioritization for a declassification review.		
<b>TOTAL</b>	<b>10</b>	<b>72</b>

**Table A-2. OIG Recommendations for Corrective Action for 1 April – 30 September 2021**

A *recommendation for corrective action* is issued in response to a finding that a federal standard is not being met; it is intended to bring the agency into compliance with the standard.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
<p><b>Audit of NGA’s Award-Fee Contracts, Report No. OIGA 21-08, Issued 14 July 2021</b></p>	<p>1</p>	<p>Require all award-fee plans, including plans from contracts transferred to NGA, be reassessed for compliance with federal, DoD, and NGA award-fee standards and updated as needed. Updated award-fee plans should include:</p> <ul style="list-style-type: none"> <li>a. Fee-determining official (FDO) approval prior to use.</li> <li>b. Clear identification of the performance evaluation board (PEB) chair and separation between the PEB chair and FDO roles.</li> <li>c. Award-fee evaluation criteria and how they are linked to relevant acquisition objectives that shall be defined in terms of contract cost, schedule, and technical performance.</li> <li>d. A description of how contractor performance will be measured against the award-fee evaluation criteria.</li> <li>e. Total award-fee pool amount and how this amount is allocated across each evaluation period.</li> </ul> <p>Furthermore, award-fee plans should be reassessed for compliance with federal, DoD, and NGA award-fee standards when there is a change to a contract’s scope, scheduled delivery, or scheduled performance.</p>
	<p>2</p>	<p>Ensure all NGA personnel overseeing contractor performance and preparing documentation related to an award-fee contract are aware of the requirements related to the content, approval, and use of award-fee plans to monitor and evaluate whether a contractor achieved the desired program outcomes.</p>
	<p>3</p>	<p>Identify and communicate to personnel overseeing contractor performance all award-fee contract documents with elements that must be maintained to comply with federal, DoD, and NGA requirements.</p>
	<p>4</p>	<p>Enhance procedures to ensure all personnel providing performance input and overseeing award-fee contracts are aware of the requirements for evaluating, documenting, and communicating contractor performance and award-fee decisions.</p>

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	5	Develop and document procedures to measure the effectiveness of award fees as a tool for improving contractor performance, which, at minimum, should include metrics for measuring the effectiveness of award fees, a system for collecting data on the use of award-fee contracts, and regular examinations of the effectiveness of award fees in achieving desired program outcomes.
<b>Audit of Maintaining Cybersecurity in the COVID-19 Telework Environment, Report No. OIGA 21-09, Issued 25 August 2021</b>	1	Update agency policies and procedures to include stakeholder roles and responsibilities for configuration management, flaw remediation, and maintenance of baseline configurations for information systems hardware and software inventory.
	2	Consistently perform phishing exercises in accordance with the frequency established by Cyber Assessment Division.
	3	Create policies and procedures for minimum remote access security configuration and continuous monitoring that need to occur due to the increase in telework.
<b>Audit of NGA's Laptop Inventory, Report No. OIGA 21-10, Issued 29 September 2021</b>	1	Ensure the NGA Supplement to DoD Government Charge Card Guide Book, Enclosure 4, Topical Listing for Purchase Card, requirements are followed when acquiring laptops with government purchase cards.
	2	Ensure a single process for laptop acquisition is followed as required by NGA Manual (NGAM) 4160.1, Accountability and Management of Property, Plant, Equipment, and Other Accountable Property.
	3	Ensure the NGAM 4160.1 requirements for laptop disposal documentation are followed.
	4	Ensure lost, damaged, destroyed laptops are reported in accordance with NGAM 4160.1.
	5	Ensure laptop inventory is performed in accordance with NGAM 4160.1.

**Table A-3. OIG Recommendations for Corrective Action Not Yet Completed Before 1 April 2021.**

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
<p><b>Audit of NGA’s SCRM, Report No. OIGA 20-06, June 2020</b></p>	<p>4</p>	<p>Ensure NGA policies and procedures are established that [REDACTED] implement SCRM program requirements. Policies and procedures should include the requirements detailed in the SECURE Technology Act; IC Directive 731; DoD Instruction (DoDI) 5200.44; and DoD Chief Information Officer (CIO) Memorandum, Guidance for the Procurement and Integration of Information and Communications Technology Components into Critical Information Systems and Networks, 24 March 2016. Coverage should include responsibilities for criticality, vulnerability, and threat assessments; impact analyses; and overall risk decisions.</p>
<p><b>Audit of NGA’s Funds Reprogramming Activity, Report No. OIGA 19-07, September 2019</b></p>	<p>2</p>	<p>FM implement additional GEOINT-Financial system document types to record funding movements and restrict the use of the RPB document type to the recording of true below threshold reprogramming transactions, as defined by congressional oversight and the ODNI.</p>
<p><b>Audit of NGA’s Permanent Duty Travel Program, Report No. OIGA 21-01, October 2020</b></p>	<p>4</p>	<p>The NGA CFE, in coordination with the NGA Director of HD, develop procedures to record permanent duty travel obligations for living quarters allowances when permanent duty travel orders are issued.</p>
<p><b>Independent Auditors’ Report on the NGA Financial Statements for FYs 2020 and 2019, Report No. OIGA 21-03, November 2020</b></p>		<p><i>Recommendations to address material weaknesses:</i></p>
	<p>1A</p>	<p>FM and OCS should revise their policies and standard operating procedures related to the dormant obligations review to fully implement procedures in accordance with DoD guidance, while also evaluating the sufficiency of the DoD sample percentages relative to NGA’s dormant obligations environment and materiality.</p>
	<p>1B</p>	<p>FM should implement a dormant obligation control for the entire fiscal year, to include a process to adjust the year-end financial statements, if necessary, for dormant obligations that have been identified as invalid but have not been de-obligated.</p>

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	1C	The Component Acquisition Executive (CAE), OCS, and FM should develop, document, and implement policies and procedures over the receiving report certification process to ensure consistent performance of the control, including verification that goods and services were received; and
	1D	CAE, OCS, and FM should review, update, and disseminate training for approving officials to ensure it includes all steps to properly certify receiving reports.
	2A	FM, SI, and the CIO and IT Services (CIO-T) components should continue their efforts to remediate personal property deficiencies, including a review of software-in-development and construction-in-progress (CIP). As part of the review, NGA should reclassify completed projects from the software-in-development account to software and from CIP to the relevant in-service personal property account. Going forward, FM, SI, and CIO-T should develop and implement a process that allows for completed assets to be placed in-service in the financial system in a timely manner.
	2B	As part of the remediation efforts described in recommendation 2A, FM, SI, and CIO-T should develop and implement a process for summarizing software-in-development and personal property CIP by project to allow for better tracking and data analysis and more timely movement from in-development or in-process to in-service.
	2C	SI should work with CIO-T and FM to assess the feasibility of implementing system configuration changes to capture personnel costs incurred for software-in-development. As an alternative, SI should work with CIO-T and FM to develop and implement a standard methodology to allocate capitalizable government personnel costs incurred during system development to software-in-development at the asset level.
	2D	SI should continue to develop, document, and implement policies and procedures for accounting for personal property as part of its corrective action plan. Such policies and procedures should include a floor-to-book inventory of capital assets.
	2E	SI, in coordination with FM, should continue to update, implement, and communicate its policy for identifying and monitoring completed personal and real property assets. The policy should include necessary approvals and requirements for completed assets to be recognized in the financial system in a timely manner.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	2F	SI, in coordination with FM, should enforce existing procedures and update NGAM 4160.1 related to the timely review and disposal of assets. The manual updates should clarify who is responsible for the disposal of capital assets and include a documented process to account for property that is no longer in use but has not yet been through all of the necessary disposal procedures.
	2G	SI should implement its property, plant, and equipment impairment monitoring policy to include all required components of Statement of Federal Financial Accounting Standards No. 10 and No. 44 and document the impairment analyses performed.
	2H	FM should ensure sufficient reviews of restatement-supporting documentation are performed prior to approval.
	2I	FM and SI should develop and implement corrective actions related to the identification of leased equipment and enhance its lease classification determination procedures to document when unique assumptions are made related to certain leases and address compliance with budgetary funding requirements.
	3A	FM complete its efforts to design and implement its fund balance with the Treasury Cash Management Report reconciliation process and internal controls, including those that compensate for the absence of assurance over the Treasury Cash Management Report.
	3B	FM coordinate with DoD to provide a sufficient analysis to support the U.S. generally accepted accounting principles basis for removing the deposit fund from NGA's financial statements.
	4A	NGA continue to use the Audit Committee as a tool for monitoring audit finding remediation with various stakeholders (i.e., leadership within FM and across other relevant components) and periodically communicating audit progress and challenges to the NGA Director or Deputy Director.
	4B	NGA develop and implement posting logic in the GEOINT-Financial System (GEO-F) to record transactions in accordance with the United States Government Standard General Ledger at the transaction level for deficiencies identified in NGA's FY 2020 evaluation.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	4C	NGA develop, document, and implement policies and procedures to monitor and enforce compliance for mandatory trainings, and document follow-up actions taken when trainings are not completed in a timely manner.
	4D	FM, in coordination with the relevant components, completely implement their internal control over financial reporting guidelines to address the GAO's <i>Standards for Internal Control in the Federal Government</i> and OMB Circular No. A-123 requirements.
	4E	FM, in coordination with the relevant components, enforce timely review of instances of management override of controls in accordance with its policy.
	4F	CIO-T, in coordination with the relevant components, update and disseminate formal plans of action and milestones (POA&Ms) with all required elements in compliance with NGA policy.
	4G	CIO-T, in coordination with the relevant components, incorporate all internal POA&Ms and the remediation of vulnerabilities in its lien management dashboard for monthly review.
	4H	CIO-T, in coordination with the relevant components, completely implement their internal control over financial systems guidelines to address the GAO's <i>Standards for Internal Control in the Federal Government</i> and OMB Circular No. A-123 requirements.
		<i>Recommendations to address significant deficiency:</i>
	1A	The CIO and CIO-T, in coordination with the relevant components, develop, document, implement, and enforce consistent [REDACTED] policies and procedures, including those related to [REDACTED]. Such procedures should include the retention of documentation to support approvals and evidence of periodic reviews.
	1B	The CIO and CIO-T, in coordination with the relevant components, enforce [REDACTED] supporting the financial systems in compliance with Committee on National Security Systems (CNSS) Instruction and NGA policy or document approved deviations from policy.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	1C	OCS develop, approve, and implement procedures to [REDACTED]; approved deviations from policy should be documented.
	1D	OCS enforce [REDACTED], including retention of evidential matter showing reviews occurred.
	1E	CIO-T develop, approve, and implement procedures that [REDACTED] for the [REDACTED].
		<i>Recommendations to address instances of noncompliance:</i>
		1. The FM, Office of Strategic Operations, and CIO-T components completely implement the Enterprise Risk Management requirements of OMB Circular No. A-123.
		2. NGA implement the recommendations provided in Exhibits I and II and improve its processes to achieve compliance with the requirements of the FFMI § 803(a).
<b>FY 2020 Evaluation of the NGA Pursuant to the FISMA, Report No. OIGA 21-07 (Internal Report), January 2021</b>	1.01	Develop and approve a process for the enforcement of HTTPS and HSTS for all current and future public-facing websites.
	1.02	Implement the enforcement of HTTPS and HSTS on all public-facing websites as required by policy.
	2.01	Implement an agency-wide continuous monitoring strategy in accordance with ODNI, CNSS, and National Institute of Standards and Technology (NIST) guidance.
	2.02	Implement a continuous monitoring policy and procedures in accordance with ODNI, CNSS, and NIST guidance.
	2.03	Implement ISCM plans in accordance with ODNI, CNSS, and NIST guidance.
	2.04	Perform continuous monitoring over NGA IT security and performance metrics, and common and information system security controls in accordance with ODNI, CNSS, and NIST guidance.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	3.01	Perform a cybersecurity workforce assessment to include all position assignments for the entire agency.
	3.02	Ensure that NGA management and supervisors are communicating annual training requirements to employees for full completion of Cybersecurity Awareness Training.
	3.03	Ensure privileged users are aware of annual privileged user training responsibilities by supervisor, program, and management communication.
	4.01	Finalize and approve standard operating procedures (SOPs) to define the privacy role-based training requirements pursuant to the NGA Privacy Program Instruction.
	4.02	<p>Enforce the Privacy Program Instruction and related SOPs to ensure:</p> <ul style="list-style-type: none"> <li data-bbox="716 884 1393 947">a. Individuals with privacy responsibilities take required role-based privacy training.</li> <li data-bbox="716 968 1377 1094">b. Privacy Threshold Analyses and Privacy Impact Assessments are completed and approved within the risk management information system's body of evidence for monitoring the risk to the environment.</li> </ul>
	4.03	Track all programs, information systems, and applications that collect and maintain personally identifiable information.
	██████████	Continue to implement milestones needed to remediate the weaknesses identified to ██████████.
	5.01	Consistently document applicable Privacy ██████████ within the Security Assessment Report or Risk Assessment Report as noted within the Authority to Operate.
	6.01	Establish notification, investigation, and reporting timelines for all defined incident categories and analyst groups.
	6.02	Establish a training program for incident handlers to be trained within 30 working days of assuming an incident response role when required by system changes or responsibility and annually thereafter.
	6.03	Establish a review and approval timeline to ensure that policies and procedures including the Incident Response Plan and annexes are reviewed and approved annually.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	7.01	Establish and implement a SCRM program within NGA, to include a program office, stakeholders, policies, and procedures.
	7.02	Establish an ██████████ plan within the SCRM program that outlines its processes to address the SCRM strategy and related policy and procedural requirements of the SECURE Technology Act.
	7.03	Implement the SCRM ██████████ plan to show processes outlined that address the SCRM strategy and implementation of related policy and procedural requirements of the SECURE Technology Act.
	8.01	Ensure all information systems in production have completed information system contingency plans (ISCPs) approved by all required parties.
	8.02	Ensure information system personnel with contingency planning responsibilities participate in ISCP exercises and document after action reports and lessons learned per their security plan identification numbers.
	8.03	Identify, track, and oversee the implementation of system alternate processing sites in accordance with CNSS, NIST, and NGA guidance. Perform evaluations to determine whether management should implement alternate processes to enable the system to meet recovery objectives in the event of a disaster at the primary processing site prior to the establishment of an alternate processing site.
	9.01	Review the compliance baseline scans to ensure that the results ██████████ are complete and accurate in accordance with ODNI, CNSS, and NIST guidance.
	9.02	Remediate ██████████ in accordance with ODNI, CNSS, and NIST guidance.
	9.03	Continue to implement an automated ██████████ solution on ██████████ servers.
	10.01	Update agency policies and procedures to reflect the current operating environment, including ██████████.
	10.02	Ensure information system management implements agency configuration management policies and procedures, including ██████████.

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
	10.03	Develop and implement processes to ██████████ to information systems in accordance with ODNI, CNSS, and NIST guidance.
	11.01	Document ██████████ to address ██████████ identified at a program level in accordance with NGA policy.
	11.02	Develop and implement a process to ensure that ██████████ address all requirements in accordance with policy and procedures.
	12.01	Define risk tolerance within the risk management strategy in accordance with NIST guidance.
	12.02	Perform risk assessments on NGA information systems in accordance with ODNI, CNSS, and NIST guidance.
	12.03	Perform risk assessments on NGA information systems in accordance with ODNI, CNSS, and NIST guidance.
	12.04	Ensure information systems' security plans are updated and maintained to reflect the current environment, in accordance with ODNI, CNSS, and NIST guidance.
	12.05	Ensure systems define the responsible entity for all required security controls and enhancements within security documentation.
	13.01	Consistently implement an approved ██████████ strategy.
	13.02	Ensure information systems implement and document the ██████████ in accordance with ODNI, CNSS, and NIST guidance.
<b>Inspection of NGA's GEOINT Standards Program, Report No. OIG 21-07, September 2021</b>	2	Evaluate how NGA is using its authority, derived from DoDD 5105.60, to compel NSG elements to implement GEOINT standards requirements and compliance and address any identified gaps or shortfalls.
	3	Submit an annual GEOINT standards report identifying the goals, objectives, and accomplishments of NGA's GEOINT standards elements to assist the NGA Director in advising the Director of National Intelligence and the Director of Defense Intelligence under DoDD 5105.60.
	6	Develop and implement a process to compel NSG programs to submit self-assessment documentation for acquisitions, as required by NSG Directive 3201, Section 6(b)(3).

Report Title, Report Number, Date	Rec. Number	Recommendations for Corrective Action
<b>Inspection of NGA’s Acquisition Function, Phase III: Policies and Processes, Report No. OIG 20-01, November 2019</b>	2	In accordance with best practices and DoDI 5000.02, Operation of the Adaptive Acquisition Framework, realign the CAE responsibilities into a position that is directly accountable to the NGA Director and oversees all acquisition functions within the agency in accordance with statute and policy. Additionally, OIG recommends that the NGA Director staff CAE’s office appropriately with subordinate staff reporting directly to the CAE. In addition, OIG recommends that the NGA Director realign and consolidate acquisition programs and activities (including contracting, research, pilots, prototypes, and acquisition of services) under the CAE.
<b>Inspection of NGA’s Insider Threat Case Management, Report No. OIG 19-01, February 2019</b>	1	Update and publish NGAI 5200.1 and NGAI 5240.2 to ensure an authoritative basis for all SI Office of Counter Insider Threat activities.
<b>Inspection of NGA’s GEOINT Services, Report No. OIG 19-02, February 2019</b>	2	Comply with DoDI 8410.01 by transitioning GEOINT Services’ unclassified environment to the .mil environment or by obtaining authorization or waiver from the NGA CIO.
<b>Inspection of NGA’s Medical Services, Report No. OIG 18-05, August 2018</b>	3	Consistent with the Economy Act, reassess whether inter-agency support is available for medical services that would be advantageous to the government. For all such support, (1) ensure documentation in an Interservice Support Agreement (DD Form 1144) and (2) ensure the support is explained in relevant internal SOPs.
	5	Implement a secure electronic transfer of NGA pre- and post-deployment health activity requirements to the Defense Medical Surveillance System.
	6	Ensure HD component’s respective primary information officer and information officer responsible for all medical program records perform Records and Information Lifecycle Management requirements including updating the office file plan with the proper file series.



**Table A-4. Financial Results from Reports Issued During 1 April – 30 September 2021**

<b>Report Title, Report Number, Date Issued</b>	<b>Questioned Costs</b>	<b>Unsupported Costs</b>	<b>Funds to Be Put to Better Use</b>
<b>Assessment of NGA’s Compliance with the PIIA for Fiscal Year 2020, Memorandum U-053-21/OIG, Issued 9 April 2021</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>Audit of NGA’s Award Fee Contracts, Report No. OIGA 21-08, Issued 14 July 2021</b>	<b>160,374</b>	<b>0</b>	<b>0</b>
<b>Audit of Maintaining Cybersecurity in the COVID-19 Telework Environment, Report No. OIGA 21-09, Issued 25 August 2021</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Audit of NGA’s Laptop Inventory, Report No. OIGA 21-10, Issued 29 September 2021</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Audit of NGA’s Use and Controls of Funds for Interagency Acquisitions, Memorandum U-173-21/OIG, Issued 15 September 2021</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>\$160,374</b>	<b>\$0</b>	<b>\$0</b>



**Table A-5. Status of Recommendations That Questioned Costs**

<b>Recommendation Status</b>	<b>Number of Reports</b>	<b>Number of Recommendations</b>	<b>Questioned Costs</b>
A. No management decision made by start of the reporting period	0	0	0
B. Issued during reporting period	1	1	\$160,374
Total A + B	1	1	\$160,374
C. Management decision made during reporting period			
(i) Dollar value of recommendations that were agreed to (disallowed costs)	1	1	\$160,374
(ii) Dollar value of recommendations that were not agreed to (allowed costs)	0	0	0
D. Total remaining for management decision at end of reporting period [(A + B) – C]	0	0	0

**Table A-6. Status of Recommendations That Funds Be Put to Better Use**

<b>Recommendation Status</b>	<b>Number of Reports</b>	<b>Number of Recommendations</b>	<b>Funds to Be Put to Better Use</b>
A. No management decision made by start of the reporting period	0	0	0
B. Issued during reporting period	0	0	0
Total A + B	0	0	0
C. Management decision made during reporting period			
(i) Dollar value of recommendations that were agreed to (disallowed costs)	0	0	0
(ii) Dollar value of recommendations that were not agreed to (allowed costs)	0	0	0
D. Total remaining for management decision at end of reporting period [(A + B) – C]	0	0	0

**Table A-7. Management Decisions Regarding OIG Recommendations in Reports Issued Before 1 April 2021**

<b>Unresolved as of 30 September 2021</b>	<b>Reports with Unimplemented Recommendations</b>	<b>Number of Unimplemented Recommendations</b>	<b>Questioned Costs</b>	<b>Funds to Be Put to Better Use</b>
Audits	10	98	\$0	\$0
Inspections	5	19	\$0	\$0
Total	15	117	\$0	\$0



## STATUTORY REPORTING

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### **Information or Assistance Refused by NGA**

Section 5(a)(5) of the IG Act requires IGs to promptly report to the head of the establishment if information requested is unreasonably refused or not provided.

During this reporting period, the IG had no instances where NGA refused to provide information or assistance.

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### **OIG Revisions to Significant Management Decisions**

Section 5(a)(11) of the IG Act requires IGs to describe and explain the reasons for any significant revised management decisions made during the reporting period.

The OIG is not aware of revisions to any significant management decisions during this reporting period.

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### **OIG Disagreement with Significant Management Decisions**

Section 5(a)(12) of the IG Act requires IGs to provide information concerning any significant management decisions with which they disagree.

During this reporting period, the IG had no instances of disagreement with significant management decisions.

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### **Compliance with the Federal Financial Management Improvement Act of 1996 (FFMIA)**

Section 5(a)(13) of the IG Act requires IGs to provide information described under section 804(b) of the FFMIA. This information involves the instances and reasons when an agency has not met target dates within its remediation plan to bring financial management systems into compliance with the law.

NGA has developed and implemented remediation plans to address areas causing noncompliance for financial management systems. NGA has met the intermediated target dates in the plans.

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### **Attempts to Interfere with the IG's Independence**

Section 5(a)(21) of the IG Act, as amended by the IG Empowerment Act, requires IGs to provide detailed descriptions of any attempts by their establishments to interfere with their independence.

The OIG did not experience any attempts to interfere with the office's independence during this reporting period.

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## Public Disclosure (Closed but Undisclosed Audits, Inspections, Investigations)

Section 5(a)(22) of the IG Act, as amended by the IG Empowerment Act, requires IGs to provide detailed descriptions of inspections, evaluations, audits, and investigations involving senior government employees that were closed during the reporting period without being publicly disclosed. Summaries of all such work are included in the appropriate sections of this report.

- Audits closed during this reporting period are described beginning on page 4.
- Inspections closed during this reporting period are described beginning on page 8.
- Investigations closed during this reporting period are described beginning on page 11.

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## Peer Reviews

Section 5(a)(14-16) of the IG Act requires IGs to report information about peer reviews that their offices have conducted or been subject to.

- The CIA OIG performed the most recent external peer review of OIGA. In the CIA OIG's report of 16 March 2021, OIGA received a rating of "pass" for its system of quality control in effect for the three-year period ending 30 September 2020. NGA OIG has no outstanding recommendations from any peer reviews of OIGA.
- The Defense Intelligence Agency (DIA) OIG led the most recent external peer review of OIGE from 11 June 2021 to 26 August 2021.
  - The review focused on any OIGE work done in accordance with the CIGIE *Quality Standards for Inspection and Evaluation*, January 2012. The team reviewed four inspection reports issued between 1 April 2018 and 30 March 2021.
  - The reviewing team determined that OIGE's internal policies and procedures, and the four inspection reports reviewed, generally complied with CIGIE's standards.
  - On 26 August 2021, DIA issued an official memo stating the review had concluded. DIA did not issue a draft report because there were no findings or recommendations.



## APPENDIX B. INVESTIGATIVE METRICS

**Table B-1. Number of Cases Referred for Criminal or Civil Prosecution**

Action	Number of Cases		
	Referred	Accepted	Declined
Criminal	0	0	0
Civil	0	0	0

**Table B-2. Judicial Actions**

Action	Number
Indictments	0
Convictions	0
Years of incarceration	0
Years of supervised release	0
Years of probation	0

**Table B-3. Criminal Prosecutions and Referrals**

Action	Number
No. investigative reports issued	0
No. individuals referred to Department of Justice for criminal prosecution	0
No. individuals referred to state and local prosecuting authorities for criminal prosecution	0
No. indictments and criminal informations resulting from any prior referral to prosecuting authorities	0

**Table B-4. Investigations of Unauthorized Public Disclosures of Classified Information**

Action	Number
The number of investigations opened by the covered official regarding an unauthorized public disclosure of classified information.	0
The number of investigations completed by the covered official regarding an unauthorized public disclosure of classified information.	0
Of the number of such completed investigations identified under subparagraph (B), the number referred to the Attorney General for criminal investigation	0

## APPENDIX C. INDEX OF REPORTING REQUIREMENTS

Semiannual Reporting Requirement		Pages
§ 5(a)(1) <sup>1</sup>	Significant problems, abuses, and deficiencies	4–19
§ 5(a)(2)	Recommendations for corrective action	24–34
§ 5(a)(3)	Significant open recommendations	20–23
§ 5(a)(4)	Matters referred to prosecutorial authorities	13
§ 5(a)(5)	Information or assistance refused	38
§ 5(a)(6)	List of completed audit, inspection, and evaluation reports	4–11
§ 5(a)(7)	Summaries of significant reports	4–12
§ 5(a)(8)	Statistical table showing questioned costs	35-36
§ 5(a)(9)	Statistical table showing recommendations that funds be put to better use	35-36
§ 5(a)(10)	Summary of reports for which no management decision was made	36
§ 5(a)(11)	Revisions to significant management decisions	38
§ 5(a)(12)	Disagreement with significant management decisions	38
§ 5(a)(13)	Federal Financial Management Improvement Act of 1996	38
§ 5(a)(14-16)	Peer reviews	39
§ 5(a)(17-18)	Investigations statistics and metrics	38
§ 5(a)(19)	Investigations involving substantiated allegations against senior officials	13
§ 5(a)(20)	Descriptions of whistleblower retaliation	14
§ 5(a)(21)	Attempts to interfere with IG independence	36
§ 5(a)(22)	Public disclosure	39
50 U.S.C. § 3235(b)(1) <sup>2</sup>	Investigations of Unauthorized Public Disclosures of Classified Information	40

<sup>1</sup> All references to § 5(a) are from the Inspector General Act of 1978, as amended.

<sup>2</sup> 50 U.S.C. § 3235(b)(1) requires that “[n]ot less frequently than once every 6 months, each covered [Inspector General] shall submit to the congressional intelligence committees a report on investigations of unauthorized public disclosures of classified information.

## APPENDIX D. ABBREVIATIONS

AIG	Assistant Inspector General
CAE	Component Acquisition Executive
CBJB	Congressional Budget Justification Book
CFE	Chief Financial Executive
C.F.R.	Code of Federal Regulations
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CIO-T	Chief Information Officer and IT Services component
CIP	construction-in-progress
CNSS	Committee on National Security Systems
COVID-19	Corona Virus Disease 2019
DCIS	Defense Criminal Investigative Service
DD Form	Department of Defense Form
DIA	Defense Intelligence Agency
DISL	Defense Intelligence Senior Leader
DoD	Department of Defense
DoDD	DoD Directive
DoDI	DoD Instruction
DoDIG	Department of Defense Office of Inspector General
FAST	Fraud Analytics Support Team
FDO	fee-determining official
FFMIA	Federal Financial Management Improvement Act of 1996
FISMA	Federal Information Security Modernization Act of 2014
FM	Financial Management Directorate
GAO	Government Accountability Office
GEO-F	GEOINT-Financial System
GEOINT	geospatial intelligence
GFM	GEOINT Functional Manager
GTCC	Government Travel Charge Card
HD	Human Development Directorate
HSTS	HTTP Strict Transport Security
HTTPS	Hypertext Transfer Protocol Secure

IG	Inspector General
IG Act	Inspector General Act of 1978
IGCS	Inspector General Career Service
IC	Intelligence Community
IC IG	Inspector General of the Intelligence Community
ISCP	information system contingency plan
IT	information technology
MOC	Office of Mission Oversight and Compliance
NGA	National Geospatial-Intelligence Agency
NGAI	NGA Instruction
NGAM	NGA Manual
NIST	National Institute of Standards and Technology
NSG	National System for Geospatial Intelligence
OCS	Office of Contract Services
ODNI	Office of the Director of National Intelligence
OIG	Office of Inspector General
OIGA	OIG Audits Division
OIGE	OIG Inspections Division
OIGI	OIG Investigations Division
OMB	Office of Management and Budget
PEB	performance evaluation board
PIIA	Payment Integrity Information Act
POA&Ms	plan of action and milestones
SCRM	Supply Chain Risk Management
SI	Security and Installations component
SOPs	standard operating procedures
STRATCOM	U.S. Strategic Command
TDY	temporary duty
U.S.C.	United States Code
VERA/VSIP	Voluntary Early Retirement Authority and Voluntary Separation Incentive Payments

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