



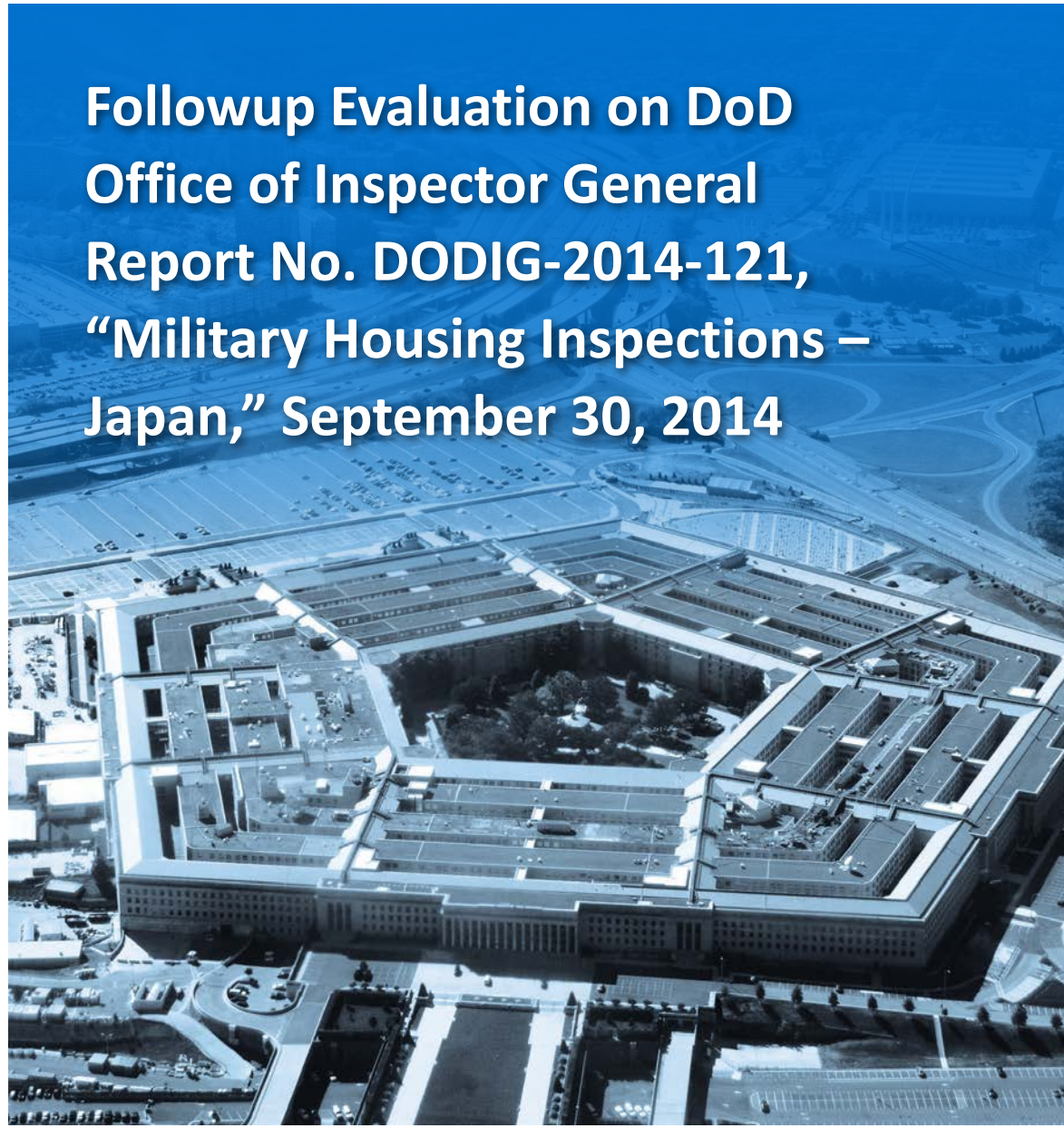
INSPECTOR GENERAL

U.S. Department of Defense

SEPTEMBER 8, 2017



Followup Evaluation on DoD Office of Inspector General Report No. DODIG-2014-121, “Military Housing Inspections – Japan,” September 30, 2014



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Results in Brief

Followup Evaluation on DoD Office of Inspector General Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014

September 8, 2017

Objective

We determined whether the Military Departments and the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD[AT&L]) implemented the recommendations from DoD Office of Inspector General (OIG) Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014.

Findings

In our 2014 report, we discussed our inspection of 15 military housing facilities in Japan, where we identified 1,057 deficiencies in fire protection, electrical systems, environmental health and safety, and housing management, which posed a risk to the health, safety, and well-being of warfighters and their families. Our prior report made various recommendations for corrective action.

In this followup evaluation, we determined that the Military Departments had partially implemented the following recommendations from our prior report:

- Conduct an effective root cause analysis and perform corrective actions for all 1,057 deficiencies identified.
- Ensure that deficiencies do not exist in other housing units.
- Ensure that the inspection, maintenance, and repair programs are in compliance with applicable codes and standards for fire protection systems, electrical systems, and environmental health and safety.

Findings (cont'd)

- Ensure that sufficient, qualified resources are assigned and available to inspect and verify that all housing facilities are in compliance with fire protection requirements, electrical system requirements, and environmental health and safety requirements.
- Ensure that housing management systems are implemented and procedures are followed.

The Military Departments collectively reported that 874 of the 1,057 (83 percent) deficiencies documented in Report No. DODIG-2014-121 were corrected as of August 2016. We followed up on 218 deficiencies at 5 of the 15 installations previously inspected, and we found that the Army had corrected 26 of 28 (93 percent), the Navy corrected 20 of 23 (87 percent), the Air Force corrected 62 of 89 (70 percent), and the Marine Corps corrected 54 of 78 (69 percent) of the 218 deficiencies. In 2016, we inspected a total of 91 buildings—74 of which contained deficiencies documented in 2014. In addition to determining whether deficiencies documented in 2014 were corrected, we inspected all 91 buildings to determine whether other similar deficiencies existed. We found that similar deficiencies did exist in these buildings.

We found cases where the Military Departments corrected similar deficiencies in locations other than those that were detailed in the prior report. However, we also found instances where deficiencies identified in the prior report were not addressed.

In response to our June 2016 Request for Information, the Military Departments each individually stated that their inspection, maintenance, and repair programs comply with applicable codes and standards. However, despite significant efforts by the Military Departments to address the deficiencies identified in 2014, based on the followup findings noted above, we concluded that the Military Departments did not fully comply with applicable codes and standards for inspection, maintenance, and repair programs.

Additionally, in response to our June 2016 Request for Information, the Military Departments stated that sufficient and qualified resources were assigned and available to



Results in Brief

Followup Evaluation on DoD Office of Inspector General Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014

Findings (cont'd)

inspect and verify that housing facilities were in compliance with fire protection, electrical system, and environmental health and safety requirements. However, the number of deficiencies identified during our followup evaluation indicates that sufficient resources were not applied.

As a result, we determined that the Military Departments did not fully implement the recommendations from Report No. DODIG-2014-121. Those recommendations, while resolved, remain open and we will continue to monitor the DoD's response to these recommendations until corrective actions are completed.

Finally, the Office of the USD(AT&L) had nonconcurred with the recommendations from our prior report to issue mold and radon assessment and mitigation guidance in the Overseas Environmental Baseline Guidance Document. We disagreed with its response and requested that management reconsider our recommendations and provide us additional comments. In response to our request for followup information in June 2016, the Deputy Assistant Secretary of Defense for Basing, responding for the USD(AT&L), stated that his office was in the process of developing and issuing, by October 2017, DoD guidance to resolve inconsistencies among the Military Services for assessing, remediating, and preventing mold; and assessing and mitigating radon. Therefore, those recommendations are resolved but remain open. We will close these recommendations once we verify that the new DoD policy includes appropriate guidance for assessing, remediating, and preventing mold; and assessing and mitigating radon.

Recommendations

We did not make any recommendations in this report.

Management Comments and Our Response

The Army provided management comments agreeing with a draft of this report. In addition, the Navy and Air Force did not provide written management comments; however, they agreed with the findings and conclusions of a draft of this report verbally and by e-mail. Although not required to comment, the Marine Corps agreed with our conclusions and provided management comments suggesting that we clarify what is required to close all remaining deficiencies and recommendations from the prior report. Therefore, we clarified in this report what is required to close the remaining deficiencies. We also provided the Marine Corps with a list of the deficiencies that we followed up on during our 2016 reinspections and whether each deficiency was corrected.

The recommendations from the prior report are resolved but will remain open. We will close all recommendations from the prior report once we verify that appropriate corrective actions were completed for all 1,057 deficiencies or after we receive a mitigation plan or an acceptance of risk memorandum signed by the Commander, U.S. Forces Japan, or higher. No further comments are required. Please see the Recommendations Table on the following page.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved*	Recommendations Closed
Under Secretary of Defense for Acquisition, Technology, and Logistics	None	D.2.a and b	None
Secretary of the Army	None	A.a–c, B, C, D.1, E	None
Secretary of the Navy	None	A.a–c, B, C, D.1, E	None
Secretary of the Air Force	None	A.a–c, B, C, D.1, E	None

* Recommendation numbers correspond with the numbers in Report No. DODIG-2014-121, “Military Housing Inspections – Japan,” September 30, 2014.

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

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





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

September 8, 2017

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION,
TECHNOLOGY, AND LOGISTICS
ASSISTANT SECRETARY OF THE AIR FORCE
(FINANCIAL MANAGEMENT AND COMPTROLLER)
INSPECTOR GENERAL, DEPARTMENT OF THE ARMY
NAVAL INSPECTOR GENERAL

SUBJECT: Followup Evaluation on DoD Office of Inspector General Report No. DODIG-2014-121,
"Military Housing Inspections – Japan," September 30, 2014
(Report No. DODIG-2017-118)

We are providing this report for your information and use. This is a followup on DoD Office of Inspector General Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014. We found that the Military Departments had not fully implemented the recommendations from our prior report, and that the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics is implementing recommendations from our prior report. We conducted this evaluation in accordance with the "Quality Standards for Inspection and Evaluation," published by the Council of the Inspectors General on Integrity and Efficiency.

We considered management comments on a draft of this report when preparing the final report. Comments from the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships; and the Head, Audit Coordination, Office of the Director, Marine Corps Staff, conformed to the requirements of DoD Instruction 7650.03; therefore, we do not require additional comments.

We appreciate the courtesies extended to the staff. Please direct questions to Mr. Timothy Lamb at (703) 604-9150 (DSN 664-9150).

A handwritten signature in black ink, appearing to read "R. Stone", is located below the text of the memorandum.

Randolph R. Stone
Deputy Inspector General
Policy and Oversight

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Introduction

Objective

We determined whether the Military Departments and the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD[AT&L]) implemented the recommendations in DoD Office of Inspector General (OIG) Report No. DODIG-2014-121, “Military Housing Inspections – Japan,” September 30, 2014. See the Appendix for the scope and methodology.

Background

On September 30, 2014, the DoD OIG published Report No. DODIG-2014-121, “Military Housing Inspections – Japan,” identifying 1,057 deficiencies in fire protection, electrical systems, environmental health and safety, and housing management at two Army, two Navy, two Air Force, and nine Marine Corps installations in Japan. These deficiencies posed a risk to the health, safety, and well-being of warfighters and their families. The inspections were conducted because of the strategic realignment of installations in the Pacific region at the time.

From October 28, 2016, to November 19, 2016, we performed onsite followup inspections at 5 of the 15 installations previously inspected. We conducted interviews with installation commanders, Department of Public Works staff, housing management staff, building managers, maintenance personnel, and facilities occupants. See the table on the next page for a list of the installations previously inspected in 2014 and the installations selected for onsite followup in 2016.

Table. U.S. Installations in Japan Selected for Inspection in 2014 and Onsite Followup in 2016

Installations Inspected in 2014	Installations Selected for Followup Inspection in 2016
Naval Air Facility Atsugi	Yes
Camp Zama	Yes
Command Fleet Activities Yokosuka	
Misawa Air Base	
Marine Corps Air Station Iwakuni	Yes
Kadena Air Base	Yes
Camp Lester	
Camp Foster	Yes
Camp Kinser	
Camp Courtney	
Camp McTureous	
Camp Hansen	
Camp Schwab	
Marine Corps Air Station Futenma	
Torii Station	

Summary of DoD OIG Report No. DODIG-2014-121

In 2014, we issued DoD OIG Report No. DODIG-2014-121. We inspected 15 military installations in Japan for fire protection, electrical systems, environmental health and safety, and housing management deficiencies. We inspected accompanied housing units (family housing), unaccompanied housing units (barracks and dormitories), mechanical rooms, and common areas. We also interviewed installation personnel, reviewed housing service-order requests, public works records, and examined program management plans and survey results. As a result of our inspection, we found 1,057 deficiencies affecting the health, safety, and well-being of warfighters and their families. Included in this total were 145 critical deficiencies which were documented in three notices of concern requiring immediate action.

Specifically, DoD OIG Report No. DODIG-2014-121 identified the following deficiencies for the installations in Japan:

- Installations had inadequate resources and a lack of diligence to inspect, maintain, and repair housing facilities.
- Installation personnel did not ensure that fire protection systems were properly installed, periodically inspected, and maintained.
- Installation personnel did not ensure that electrical systems were properly installed, periodically inspected, and maintained.
- Installation personnel did not adhere to environmental regulations or best practices to ensure the health and safety of occupants regarding mold and radon.
- Housing management systems were not fully implemented and procedures were not always followed by installation personnel.

Our 2014 inspections covered an average of two percent of housing units at each installation. We inspected these facilities for compliance with applicable DoD and Federal environmental health and safety policies and standards. These policies and standards included the United Facilities Criteria; National Fire Protection Association codes and standards, including the National Electrical Code; and environmental standards.¹

Recommendations and Agreed-Upon Management Actions

In Report No. DODIG-2014-121, we recommended that the Military Departments:

- Conduct an effective root cause analysis and perform corrective actions for all 1,057 deficiencies identified.
- Ensure that these deficiencies do not exist in other housing units.
- Ensure that inspection, maintenance, and repair programs are in compliance with applicable codes and standards for fire protection systems, electrical systems, and environmental health and safety.
- Ensure that sufficient, qualified resources are assigned and available to inspect and verify that all housing facilities are in compliance with fire protection requirements, electrical system requirements, and environmental health and safety requirements.
- Ensure that housing management systems are implemented and procedures are followed.

¹ See Appendix D of Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014, for a list of criteria used for the 2014 inspections.

Army, Navy, and Air Force officials responded and agreed with our recommendations and stated that actions were either complete or underway to resolve the issues identified in the report.

Additionally, we recommended that the USD(AT&L) issue mold and radon assessment and mitigation guidance in the Overseas Environmental Baseline Guidance Document (OEBGD). The Acting Deputy Under Secretary of Defense for Installations and Environment, responding for the USD(AT&L), initially nonconcurred with our recommendations. He stated that modifying the OEBGD by creating standards for application outside the United States that do not have application inside the United States would undermine the purpose of the OEBGD and effectively apply differing standards outside the United States from those applied inside the United States. However, he stated that his office would facilitate sharing of lessons learned across the Military Services to ensure that the Military Services' practices are fully informed. We disagreed with the response and requested that management reconsider our recommendations and provide us additional comments. Official comments were not received until we requested information for this followup evaluation.

Finding A

The Military Departments Partially Implemented Recommendations From DoD OIG Report No. DODIG-2014-121, “Military Housing Inspections – Japan”

The Military Departments partially implemented the following recommendations from Report No. DODIG-2014-121.

- Conduct an effective root cause analysis and perform corrective actions for the 1,057 deficiencies identified.
- Ensure that these deficiencies do not exist in other housing units.
- Ensure that inspection, maintenance, and repair programs are in compliance with the applicable codes and standards for fire protection systems, electrical systems, and environmental health and safety.
- Ensure that sufficient, qualified resources are assigned and available to inspect and verify that all housing facilities are in compliance with fire protection requirements, electrical system requirements, and environmental health and safety requirements.
- Ensure that housing management systems are implemented and procedures are followed.

As of August 2016, the Army reported to us that 54 of 70 (77 percent) of the deficiencies identified had been corrected. The Navy reported to us that 125 of 137 (91 percent) of the deficiencies identified had been corrected. The Air Force reported to us that 320 of 406 (79 percent) of the deficiencies identified had been corrected. The Marine Corps reported to us that 375 of 444 (84 percent) of the deficiencies identified had been corrected. We followed up on 218 of 566 deficiencies at 5 of the 15 installations previously inspected.² We validated that the Army corrected 26 of 28 (93 percent), the Navy corrected 20 of 23 (87 percent), the Air Force corrected 62 of 89 (70 percent), and the Marine Corps corrected 54 of 78 (69 percent) of the 218 deficiencies.

² There were 1,057 deficiencies at the 15 locations we inspected in 2014. Of those 1,057 deficiencies, 566 were from the 5 locations we selected for our followup inspections.

Although actions were taken to correct many of the previously identified deficiencies, the Military Departments' corrective action plans did not effectively correct all deficiencies noted in our 2014 inspection and lessons learned were not extended to other housing units. The continued existence of the deficiencies found during our followup evaluation indicates that the efforts involved to ensure compliance with all applicable fire, electrical, and environmental health and safety requirements were not adequate, and that sufficient resources were not applied.

As a result, we determined that the Military Departments did not fully implement the recommendations in Report No. DODIG-2014-121.

Not All of the Deficiencies Reported as Corrected Were In Fact Corrected

In October and November 2016, we performed onsite inspections at five installations in Japan, following up on 218 of the deficiencies that the Military Departments identified as corrected, including 42 deficiencies identified as critical during the original inspection. We found that the majority of these deficiencies were in fact corrected (about 74 percent), including all but 1 of the critical deficiencies.³

However, despite the efforts of the Military Departments to address the deficiencies identified in 2014, the deficiencies continued to exist in 2016. We found that 56 deficiencies reported as corrected by the Military Departments were not corrected. Examples of the uncorrected deficiencies (reported as corrected) included an improperly grounded building, lack of ground-fault circuit interrupter (GFCI)-protected electrical receptacles, broken emergency exit signs and lights, and problems with self-closing fire doors designed to separate emergency egress corridors from other areas of unaccompanied housing buildings.⁴

The identification of uncorrected health and safety deficiencies during this followup evaluation indicates that the underlying root causes were not fully addressed in order to eliminate these deficiencies completely.

³ We found that critical deficiency IWA-FP-140303-024, detailing storage shelving in a family housing building at Marine Corps Air Station Iwakuni that obstructed fire sprinkler coverage in tenant storage areas, was not corrected.

⁴ A GFCI is a fast-acting circuit breaker designed to provide protection to personnel and property by disconnecting electric power in the event that a short circuit or return current imbalance is detected.

Deficiencies Similar to Those Identified in 2014 Existed in Other Housing Units

The 2014 inspections documented 1,057 deficiencies in only two percent of the housing units at each installation. Report No. DODIG-2014-121 recommended that installations perform a comprehensive check to ensure that the deficiencies do not exist in housing units that were not included in the 2014 inspection. In its management response, the Army stated that specific actions were taken to ensure that noted life, safety, and health deficiencies do not exist in other housing units. The Navy and Marine Corps stated that many actions were completed and others were underway to ensure that deficiencies do not exist in other housing units. The Air Force stated that it was inspecting its housing inventory for similar deficiencies and was monitoring progress to ensure all necessary corrective actions are complete.

In 2016, we inspected a total of 91 buildings—74 of which contained deficiencies documented in 2014. In addition to determining whether deficiencies documented in 2014 were corrected, we inspected all 91 buildings to determine whether other similar deficiencies existed. We found that similar deficiencies did exist in these buildings.

For example, in Report No. DODIG-2014-121, we documented that four housing units at Marine Corps Air Station Iwakuni did not have smoke alarms installed in sleeping rooms. When we reinspected Marine Corps Air Station Iwakuni in 2016, we found three additional housing units that did not have smoke alarms installed in sleeping rooms.

Furthermore, we found the same lack of effort at all bases to ensure that fire doors separating exit corridors remained closed, as required, throughout 18 of the 19 unaccompanied housing buildings that we inspected.

Additionally, Report No. DODIG-2014-121 documented a systemic lack of GFCI-protected outlets at installations throughout Japan. During our followup inspections in 2016, we found instances of laundry rooms, bathrooms, kitchens, and outdoor areas that did not have the required GFCI-protected outlets at each of the five installations we re-visited.

Based on our followup evaluation, we found that even if actions were taken to correct the previous deficiencies, the corrective action plans did not effectively correct all deficiencies previously noted in the 2014 inspection and were not extended to other units.

The Military Departments' Efforts Are Ongoing to Improve Compliance With Fire Protection, Electrical Systems, and Environmental Health and Safety Requirements

In response to our recommendation in Report No. DODIG-2014-121, the Military Departments indicated that their efforts were ongoing to ensure that inspection, maintenance, and repair programs continue to comply with applicable codes and standards. For example, the Air Force indicated that change of occupancy maintenance inspection checklists were updated to reflect many of the recurring findings noted in our prior report. The Air Force also stated that preventive maintenance is performed by certified professionals. The Army, Navy, and Marine Corps indicated that they were addressing our recommendation by implementing corrective actions for the deficiencies identified in our prior report.

However, during the reinspection, we continued to identify similar deficiencies with those identified in 2014. For example, in 2014 we documented that the shared fire alarm for three unaccompanied housing buildings at Naval Air Facility Atsugi indicated a fault condition and may not have been fully operational. When we reinspected Naval Air Facility Atsugi in 2016, we found that the original fault had been corrected; however, a new fault was present, caused by a malfunctioning smoke alarm in one housing unit. As a result of this fire alarm system fault, notification devices were not functioning on the first floor of building 980. We also found that the fire alarm in unaccompanied housing building 986 indicated a fault condition and audible notification devices were not functioning on the first floor. These problems at Naval Air Facility Atsugi, which existed since July 2016, had not been corrected in a timely manner.

Additionally, during our reinspection of Marine Corps Air Station Iwakuni in 2016, we found fire protection deficiencies throughout the three unaccompanied housing buildings we inspected. Specifically, we found 16 fire extinguishers that were not being periodically checked as required, fire doors separating exit corridors that were propped open, 14 nonfunctional emergency exit signs, and 1 building with a fire alarm system that did not have a functioning audible notification.

Therefore, the Military Departments need to continue to improve compliance with all applicable fire protection, electrical system, and environmental health and safety requirements as recommended in Report No. DODIG-2014-121.

Sufficient Resources Were Not Always Available to Verify Compliance With Fire Protection, Electrical, and Environmental Health and Safety Requirements

Our 2014 report recommended that the Military Departments ensure that sufficient, qualified resources are available and assigned to inspect and verify that all housing buildings and units are in compliance with requirements for fire protection, electrical systems, and environmental health and safety.

The Commander, U.S. Army Garrison Japan, responding to our 2016 Request for Information for the Department of the Army, stated that housing offices had qualified resources available and assigned, and worked in cooperation with installation safety offices, fire departments, and departments of public works to ensure compliance with all requirements. The Army reported to us that 54 of 70 (77 percent) of the deficiencies identified had been corrected. We validated that the Army corrected 26 of 28 (93 percent) of the deficiencies.

The Commander, Navy Installations Command, responding to our 2016 Request for Information, stated that the Navy ensured that sufficient and qualified resources were available and assigned to inspect all facilities for compliance with fire protection, electrical, and environmental health and safety requirements. He also stated that the Navy had sufficient funding to augment staff if required. Additionally, the commander stated that the Navy and Marine Corps provided training during FY 2015 and FY 2016 to ensure housing inspectors and managers were knowledgeable of the life, health, and safety requirements to maintain Navy housing assets. The Navy reported to us that 125 of 137 (91 percent) of the deficiencies identified had been corrected. The Marine Corps reported to us that 375 of 444 (84 percent) of the deficiencies identified had been corrected. We validated that the Navy corrected 20 of 23 (87 percent) and the Marine Corps corrected 54 of 78 (69 percent) of the deficiencies.

The Chief, Housing Management Division, Air Force Installation and Mission Support Center Detachment 2, responding to our 2016 Request for Information for the Department of the Air Force, stated that preventive maintenance was performed for family housing and dormitories on a recurring basis by certified professional tradesmen knowledgeable on codes, standards, and policies applicable to their professions. Furthermore, the chief stated that changes were made to preventive maintenance programs, inspection standards, and change of occupancy procedures to address several issues related to housing management. The Air Force reported to us that 320 of 406 (79 percent) of the deficiencies identified had been corrected. We validated that the Air Force corrected 62 of 89 (70 percent) of the deficiencies.

Despite the statements by all Military Services that sufficient resources were available to verify compliance with fire protection, electrical systems, and environmental health and safety requirements, the number of deficiencies still not corrected indicates that sufficient resources may not have been available.

Housing Management Systems Were Implemented, but Deficiencies Persisted

We found that each installation we reinspected had established housing management systems and processes to track service calls and work orders. Housing management personnel used the systems to schedule both corrective and preventive maintenance.

However, we found several problems related to housing management systems throughout the installations in Japan. For example, at Camp Zama, the change of occupancy checklist—used to ensure housing units comply with requirements when tenants turnover—did not include the inspection of smoke detectors for proper operation. Additionally, Camp Zama had not implemented the First Sergeants Barracks Program 2020, an Army-wide initiative launched in 2012 that directed Army garrisons and units assigned to installations to manage their unaccompanied housing facilities.

At Kadena Air Base, historical work order information was only stored for three years and work order information was not available to demonstrate that past work was completed to correct deficiencies identified in our prior report. This occurred due to limitations of the Interim Work Information Management System, the information system used to track all housing maintenance service tickets. We also found that at Marine Corps Air Station Iwakuni, preventive maintenance was not being executed in accordance with the installation's established checklists and procedures in older unaccompanied housing units.

Improvements in housing management are still needed as evidenced by the previously discussed conditions and the 56 deficiencies that the Military Departments identified as closed but were not actually corrected.

Summary

Based on our assessment of management actions, we found that the majority of the deficiencies identified in Report No. DODIG-2014-121 were corrected and we found cases where the Military Departments corrected similar deficiencies in locations other than those that were detailed in our prior report. However, we found instances of deficiencies identified in the prior report that were not addressed and we also found that similar deficiencies did exist in other housing units.

In response to our June 2016 Request for Information, the Military Departments each individually stated that inspection, maintenance, and repair programs comply with applicable codes and standards. However, despite significant efforts by the Military Departments, based on the followup findings noted above, we concluded that the Military Departments did not fully comply with applicable codes and standards for inspection, maintenance, and repair programs.

Additionally, in response to our June 2016 Request for Information the Military Departments stated that sufficient and qualified resources were assigned and available to inspect and verify that housing facilities were in compliance with fire protection, electrical system, and environmental health and safety requirements. However, the number of deficiencies identified during our followup evaluation indicates that sufficient resources were not applied.

As a result, we concluded that the Military Departments did not fully implement the recommendations in Report No. DODIG-2014-121 and may not have addressed all the underlying root causes of the deficiencies.

All previous recommendations to the Secretaries of the Military Departments in the 2014 report remain resolved but open. We will close each recommendation after determining that appropriate corrective action is completed. For any corrective action that is cost prohibitive or impractical, we will close the recommendation upon receipt and review of a mitigation plan or memorandum accepting the risk signed by the Commander, U.S. Forces Japan, or higher.

Management Comments on the Report and Our Response

Although not required to comment, the Deputy Assistant Secretary of the Army for Installations, Housing, and Partnerships; and the Head, Audit Coordination, Office of the Director, Marine Corps Staff provided the following comments on the report. For the full text of the comments, see the Management Comments section of the report.

Army Comments

The Deputy Assistant Secretary of the Army agreed with the findings in the report and stated that the Army will continue to work on compliance with all recommended requirements.

Our Response

We appreciate and commend the Army's commitment to compliance.

Marine Corps Comments

The Head, Audit Coordination, stated that the Marine Corps agreed with the conclusions of our report, but he recommended that the final report include clarification of what is required by the Military Departments to close all previous recommendations as well as what documentary evidence is required to close all remaining deficiencies.

Our Response

Those deficiencies that the Military Departments have stated were corrected are considered closed except for the deficiencies that we followed up on during our 2016 reinspection and found were not adequately corrected. On June 23, 2017, we provided a list of these deficiencies in an e-mail to the Marine Corps and in August 2017, we provided this list to each of the Military Departments.

We will close the deficiencies that we followed up on in 2016 and found were not corrected, and any other deficiencies not previously identified as corrected, once the Military Departments provide a description of corrective actions taken. For those deficiencies that will be corrected through future building renovation projects or those planned for risk mitigation, we will close these once we receive documentation of a risk mitigation plan or an acceptance of risk signed by the Commander, U.S. Forces Japan, or higher.

Finding B

The USD(AT&L) Is Implementing Mold and Radon Assessment and Mitigation Guidance

In response to Report No. DODIG-2014-121, the Office of the USD(AT&L) nonconcurred with the recommendation to issue mold and radon assessment and mitigation guidance in the Overseas Environmental Baseline Guidance Document. However, in response to our June 2016 request for followup information, the Deputy Assistant Secretary of Defense for Basing, responding for the USD(AT&L), stated that his office was performing a thorough review of DoD guidance for all DoD-controlled housing worldwide and planned to develop DoD guidance by October 2017 to resolve inconsistencies among the Military Services in the handling of mold and radon issues.

Report No. DODIG-2014-121 USD(AT&L) Recommendations

Report No. DODIG-2014-121 recommended that the USD(AT&L) should include guidance in the Overseas Environmental Baseline Guidance Document (OEBGD)⁵ for (1) the control and remediation of mold and (2) radon evaluation and mitigation in military housing facilities.

In 2014, in response to our report, the Acting Deputy Under Secretary of Defense for Installations and Environment, responding for the USD(AT&L), nonconcurred with our recommendations to include such guidance in the OEBGD. He stated that modifying the OEBGD by creating standards for application outside the United States that do not have application inside the United States would undermine the purpose of the OEBGD and effectively apply differing standards outside the United States from those applied inside the United States. However, he stated that his office would facilitate the sharing of lessons learned across the Military Services to ensure that their practices are fully informed.

We disagreed with the response from the USD(AT&L) and noted that during our inspection, we found that DoD personnel did not effectively implement mold control and remediation, and radon mitigation due to a lack of guidance for overseas installations. We requested that management reconsider our recommendations and provide us with additional comments.

⁵ The purpose of DoD 4715.05-G, "Overseas Environmental Baseline Guidance Document," May 1, 2007, is to provide criteria and management practices to be used by the DoD for establishing overseas environmental requirements, called "Final Governing Standards."

In response to our request for followup information in June 2016, the Deputy Assistant Secretary of Defense for Basing, responding for the USD(AT&L), stated that his office was performing a thorough review of DoD guidance for all DoD-controlled housing worldwide, to determine if policy is needed to address a significant health risk or to improve consistency in program execution across the DoD.

For mold control and remediation, he stated that the his office found some minor inconsistencies in Military Service guidance for assessing, remediating, and preventing mold in DoD-controlled housing. Furthermore, he stated that his office was drafting guidance to resolve these inconsistencies.

For radon evaluation and mitigation, the Deputy Assistant Secretary of Defense for Basing, stated that his office met with the Environmental Protection Agency and the Military Services, and was developing guidance to address inconsistencies in radon evaluation and mitigation across the Military Services.

A representative of the Office of the USD(AT&L) stated that the planned completion date for guidance on mold and radon was October 2017.

Summary

USD(AT&L) did not agree to implement our recommendations in Report No. DODIG-2014-121. However, in response to our June 2016 request for followup information, the Deputy Assistant Secretary of Defense for Basing stated that his office was in the process of issuing DoD guidance to resolve inconsistencies among the Military Services for: (1) assessing, remediating, and preventing mold and (2) assessing and mitigating radon.

Therefore, the recommendations are resolved but remain open. We will close these recommendations once we verify that the new DoD policy includes appropriate guidance for assessing, remediating, and preventing mold; and assessing and mitigating radon.

Appendix

Scope and Methodology

We conducted this followup evaluation from September 2016 through May 2017 in accordance with the “Quality Standards for Inspection and Evaluation,” published by the Council of the Inspectors General on Integrity and Efficiency in January 2012. Those standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings, conclusions, and recommendations based on our review objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our review.

To accomplish the objective, we:

- analyzed responses from the Military Services and the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics regarding the status of all recommendations contained in Report No. DODIG-2014-121;
- performed followup on-site inspections at 5 of the 15 installations originally inspected in 2014 to verify that adequate corrective actions were taken to address the deficiencies;
- interviewed personnel regarding the implementation of corrective actions;
- reviewed records and plans relating to the implementation of corrective actions; and
- performed inspections to determine if systemic deficiencies still existed or if any deficiencies not documented during the previous inspections existed.

Use of Computer-Processed Data

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

Use of Technical Assistance

During this followup evaluation, we used the assistance of subject matter experts in the areas of fire protection engineering, electrical system safety, and industrial hygiene.

Prior Coverage

The DoD Office of Inspector General (DoD OIG) has issued eight reports from July 2013 to October 2016 related to health and safety inspections of DoD facilities at various locations around the world, documenting deficiencies in fire protection systems, electrical system safety, and environmental health and safety. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/pubs/index.cfm>.

DoD OIG

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

We summarized and analyzed previous DoD OIG health and safety inspections of DoD-occupied facilities and military housing and evaluated policy and guidance regarding health and safety requirements for DoD-occupied facilities. We found that the average number of deficiencies per building was consistent regardless of location. For instance, we found an average of two to three electrical and fire protection deficiencies for each building inspected, and one environmental health and safety deficiency for every two buildings inspected. The pervasiveness of fire protection, electrical system, and environmental health and safety deficiencies was the most significant trend that we observed.

Report No. DODIG-2016-139, “Military Housing Inspection – Camp Buehring, Kuwait,” September 30, 2016

We identified a total of 538 deficiencies that could affect the health, safety, and well-being of the warfighters. The majority of the deficiencies identified during the inspections resulted from insufficient inspection, inadequate maintenance, lack of an effective maintenance and inspection plan, and ineffective project oversight.

Report No. DODIG-2016-106, “U.S. Military-Occupied Facilities Inspection—King Abdullah II Special Operations Training Center,” July 7, 2016

We identified a total of 286 deficiencies that could affect the health, safety, and well-being of the warfighters. Of the total deficiencies, 77 were critical deficiencies requiring immediate corrective action.

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

We identified a total of 389 deficiencies that could affect the health, safety, and well-being of the warfighters and their families. The majority of deficiencies identified during our inspections resulted from improper installation, insufficient inspection, and inadequate maintenance of housing facilities.

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

We identified a total of 316 deficiencies that could affect the health, safety, and well-being of warfighters and their families. Of the total deficiencies, 131 were fire protection system, 168 were electrical system, and 17 were environmental health and safety.

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

We inspected DoD military housing in Republic of Korea for compliance with DoD and Federal environmental health and safety policies and standards. The majority of the 646 deficiencies identified during our inspection were attributed to insufficient inspection, maintenance, and repair of housing facilities.

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

We inspected DoD military housing in Japan for compliance with DoD and Federal environmental health and safety policies and standards. The majority of the 1,057 deficiencies identified during our inspection were attributed to insufficient inspection, maintenance, and repair of housing facilities.

Report No. DODIG-2013-099, "Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan," July 18, 2013

We determined whether electrical and fire suppression systems in selected facilities in Afghanistan are in compliance with the National Electrical Code, Unified Facilities Criteria, and the National Fire Protection Association Standards. We found a lack of consistent adherence to standards as evidenced by 1,089 findings. Also, Garrison commands lacked qualified Government or dedicated contractor electricians, fire alarm, or fire suppression technicians on their staffs to perform inspection, testing, and maintenance.

Management Comments

Department of the Army



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY OF THE
ARMY INSTALLATIONS, ENERGY AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON DC 20310-0110

20 JUN 2017

SAIE-IHP

MEMORANDUM FOR Inspector General, Department Of Defense, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: Follow-up Evaluation: Recommendations from Report No. DODIG-2014-121 Were Partially Implemented to Correct Health and Safety Deficiencies at Military Housing Facilities in Japan (Project No. D2016-DOOOPT-0171.000)

1. My staff has reviewed the subject report and we concur with the findings.
2. We will continue to work on improving compliance with all applicable requirements recommended in Report No. OOOIG-2014-121.
3. The POC for this action is [REDACTED]

PAUL D. CRAM-E-R
Deputy Assistant Secretary of the Army
(Installations, Housing and Partnerships)

Marine Corps



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON, DC 20350-3000

29 Jun 2017

MEMORANDUM FOR DEPUTY INSPECTOR GENERAL FOR POLICY AND
OVERSIGHT, OFFICE OF THE INSPECTOR GENERAL,
U.S. DEPARTMENT OF DEFENSE

SUBJECT: DODIG Official Followup Evaluation Report:
Recommendations From Report No. DODIG-2014-121 Were
Partially Implemented to Correct Health and Safety
Deficiencies at Military Housing Facilities in Japan
(Project No. D2016-D000PT-0171.000)

We are providing the following U.S. Marine Corps Military
Service-level technical comments for DODIG consideration in
formulating the upcoming final report for the subject
evaluation.

The following comments were coordinated with the Office of the
Inspector General of the Marine Corps (IGMC)/Deputy Naval
Inspector General for Marine Corps Matters (DEPNAVINGEN-MCM);
Marine Corps Installations Command-Pacific (MCIPAC); Marine
Corps Installation Command, Facilities (MCICOM, GF); and were
reviewed and approved by the Office of the Deputy Commandant for
Installations and Logistics, Headquarters, U.S. Marine Corps.

In 2014, DODIG inspected military housing throughout Japan,
identifying 1,057 deficiencies at 15 camps and installations.
The resulting report, in addition to providing recommendations
to the Under Secretary of Defense for Acquisition, Technology,
and Logistics (OUSD (AT&L)), also made five recommendations to
the Military Departments: (1) Conduct a root cause analysis and
perform corrective actions for the deficiencies; (2) Ensure
similar deficiencies do not exist in other facilities; (3)
Ensure the inspection, maintenance and repair programs comply
with applicable codes and standards; (4) Ensure that sufficient,
qualified resources are assigned and available to ensure
compliance with safety requirements; and (5) Ensure housing
management systems are implemented and procedures are followed.
The followup inspection re-visited five locations including
Marine Corps Base Camp Butler (Camp Foster) and Marine Corps Air
Station Iwakuni. The DODIG team evaluated implementation of the
five recommendations addressed to the Military Departments,
validated completion of original deficiencies, identified
original deficiencies that remain incomplete and inspected for
similar deficiencies in other military housing units. The
current official draft evaluation report concludes that the
Military Services partially implemented the prior
recommendations and notes that all recommendations will remain

Marine Corps (cont'd)

SUBJECT: DODIG Official Followup Evaluation Report:
Recommendations From Report No. DODIG-2014-121 Were
Partially Implemented to Correct Health and Safety
Deficiencies at Military Housing Facilities in Japan
(Project No. D2016-D000PT-0171.000)

resolved but open pending full Defense Department implementation; the recommendations will be closed when DODIG is provided sufficient documentation to be able to determine that appropriate corrective actions have been completed.

We concur with the current DODIG official draft followup evaluation report conclusions that the majority of deficiencies identified in the 2014 final report are either corrected or are being corrected; that similar deficiencies have now been found in other housing units as a result of this DODIG follow-up evaluation; and that Military Service corrective actions are ongoing in response to the prior recommendations and the additional military housing units' deficiencies.

Notwithstanding the foregoing concurrence, it is our opinion that the content of the current official draft followup evaluation report deviates significantly from the content of the discussion draft provided in 2016. Specifically, the 2016 discussion draft assessed elements of the root cause analyses and highlighted systemic challenges that may require additional resources or policy review. The current official draft report makes only broad reference to insufficient resources.

The 2016 discussion draft focused on 145 original deficiencies considered critical and documented in Notices of Concern. The 2016 discussion draft proposed to allow 30 days following release of the upcoming final report for Military Services to document completion of corrective actions in response to these specific, numbered findings. The current official draft report does not address a process to document appropriate corrective actions to demonstrate full implementation for each of the five recommendations to be considered closed. A specified, standardized process proposed in the upcoming final report may assist DODIG in receiving consistently comparable updates from all Military Services/Military Departments.

The current official draft report makes reference to the original deficiencies, the self-reported completion percentages for each Military Service, and the Service-level subsets of deficiencies re-inspected in 2016. The current official draft report further notes that new deficiencies were identified during the DODIG followup evaluation. The 2014 final report lists 145 critical deficiencies by number and type in Notices of Concern. The remaining original deficiencies were provided to the Military Services separately in 2014. The 2016 discussion draft consolidates these data elements and re-baselines the deficiency listing by enumerating the critical deficiencies that DODIG considers closed and those that require additional

Marine Corps (cont'd)

SUBJECT: DODIG Official Followup Evaluation Report:
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documentation. The current official draft report does not reconcile the 2014 deficiencies in this way. We suggest that if the Military Services will continue to report completion of individual deficiencies, that the DODIG deficiency list be re-baselined following the DODIG followup evaluation, as proposed in the DODIG 2016 discussion draft report.

Many of the remaining open deficiencies are planned for correction by whole building renovation projects that will trigger the requirement to bring existing building systems into compliance with current codes and standards. The current official draft report does not speak to whether this status adequately resolves/closes or will resolve/close a deficiency. For clarity, we suggest DODIG address this in the upcoming final report.

The Marine Corps Installations Command (MCICOM) provided the Inspector General of the Marine Corps (IGMC)/Deputy Naval Inspector General for Marine Corps Matters (DEPNAVINSGEN-MCM) updated Marine Corps housing inspection checklists that address the issues identified in the DODIG 2016 discussion draft report. In coordination with IGMC inspections, the MCICOM plan of action is to also include the updated Marine Corps housing inspection checklists in future Command-level installation inspections. Copies of the updated Marine Corps housing inspection checklists for Unaccompanied Housing and for Family Housing are attached for DODIG's review.

The U.S. Marine Corps does not recommend that the Military Services/Military Departments provide deficiency-level responses to the current DODIG official draft follow-up evaluation report. Instead, we suggest DODIG consider finalizing the current official draft evaluation report in a manner such that the upcoming final report would provide a current reconciliation of both the original and new deficiencies considered closed, and also specifically express any DODIG expectations for documentary evidence when the remaining deficiencies have been reported by the Military Services/Military Departments and OUSD (AT&L) as having been adequately addressed and completed. As previously noted above, it is our opinion that doing so will assist DODIG in receiving consistently comparable updates from all Military Services/Military Departments.

It is our opinion that if the foregoing technical comments are considered when DODIG formulates its final report, the Military Services/Military Departments and OUSD (AT&L) will have clear methodologies to report completion of remaining corrective actions in response to identified deficiencies that will provide

Marine Corps (cont'd)

Final Report Reference

SUBJECT: DODIG Official Followup Evaluation Report:
Recommendations From Report No. DODIG-2014-121 Were
Partially Implemented to Correct Health and Safety
Deficiencies at Military Housing Facilities in Japan
(Project No. D2016-D000PT-0171.000)

the DODIG with consistent reporting of our implementation of the
DODIG 2014 evaluation report and the upcoming followup report.

For questions regarding these comments, you may contact me at



C. K. DOVE
Head, Audit Coordination
Office of the Director,
Marine Corps Staff

Attachments:
As stated

**Enclosure omitted
because of length**

Copy to:
NAVINSGEN (N11)
DEPNAVINSGEN (IGMC)
DC, I&L
COMMANDER, MCICOM
DC, P&R (PM, MCMICP)
CL

Acronyms and Abbreviations

GFCI	Ground-Fault Circuit Interrupter
OEBGD	Overseas Environmental Baseline Guidance Document
USD(AT&L)	Under Secretary of Defense for Acquisition, Technology, and Logistics



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U.S. DEPARTMENT OF DEFENSE

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