

NATIONAL SECURITY AGENCY
OFFICE OF THE INSPECTOR GENERAL



Audit of the Agency's Parking and Transportation Initiatives

AU-19-0013
20 October 2021





NOTE: A classified version of the Audit of the *National Security Agency's Parking and Transportation Initiatives* formed the basis of the unclassified version. This unclassified version of the audit report contains the first three findings and related recommendations from the classified report, which the National Security Agency (NSA) Office of the Inspector General (OIG) determined to be of public interest. The OIG has endeavored to make this unclassified version of that portion of the audit report as complete and transparent as possible. However, where appropriate, the NSA OIG has rephrased, removed, or redacted information to present pertinent public information, avoid disclosure of classified information, and as required to protect NSA sources and methods and ensure the fairness and accuracy of the unclassified version of the report. In that regard, the classified version of this report contained additional details and information that could not be included in the public version of this report. A summary of the full report will be included in both the classified and unclassified versions of the OIG's Semiannual Report to Congress for the period 1 April 2021 through 30 September 2021.



EXECUTIVE SUMMARY

Why We Did This Audit

The overall objective of this audit was to assess the economy, efficiency, and effectiveness of recent parking and transportation initiatives, and to determine if they were in compliance with applicable laws, regulations, policies, and best practices.

Conclusion

The findings identified by the OIG in this audit highlight the lack of centralized strategic planning, poor initiative implementation, and ineffective monitoring that has created control deficiencies, wasted funds, and has negatively impacted employee morale. The OIG made 8 recommendations as to the findings above to assist the Agency in addressing these issues.

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What We Found

For decades, Agency employees have expressed concerns about the parking at the National Security Agency, Washington (NSAW). However, the Agency has not identified parking as a priority and has failed to implement solutions that would minimize the parking shortage or improve employee morale. Due to this lack of prioritization by the Agency, the Office of the Inspector General (OIG) found several concerns including the following:

- **Agency parking and transportation initiatives lacked sufficient goals, plans, and strategies.**

Without established goals, plans, and strategies for improving parking, Installations & Logistics (I&L) was not meeting employee needs and is unable to effectively plan for future initiatives. Parking and transportation initiatives were not centrally managed and, therefore, were completed in an ad-hoc manner resulting in wasted funds and limited success.

- **Agency parking and transportation initiatives had significant internal control deficiencies.**

Basic internal control deficiencies such as the lack of consistent processes for developing, approving, and implementing parking and transportation initiatives resulted in projects being demolished, inoperable, or only partially implemented, limiting or eliminating their value to the Agency and negatively affecting employee morale.

- **I&L constructed a parking garage that could not be used and was demolished.**

The Agency wasted approximately \$3.6 million on a parking structure that had never been built in the United States before. Due to the lack of internal controls related to project oversight, risk assessment, and dispute resolution, the new-concept parking structure was demolished without ever being used.

Robert P. Storch
Inspector General
20 October 2021



(U) CONTENTS

Executive Summary i

I. Introduction 1

II. Results of the Audit 3

 FINDING 1: Agency parking and transportation initiatives lacked sufficient goals, plans, and strategies. 3

 FINDING 2: Agency parking and transportation initiatives had significant internal controls deficiencies. 11

 FINDING 3: I&L constructed a parking garage that could not be used and was demolished. . . 18

III. Recommendations 25

Appendices 29

 APPENDIX A: About the Audit 29

 APPENDIX B: Abbreviations and Organizations 32



I. INTRODUCTION

Background

For decades, Agency employees have expressed concerns about the shortage of parking at NSA Washington (NSAW). Of 633 NSA Newsletters (see Figure 1) published since 1954, the OIG found that 366 mention parking, with the earliest observed employee parking complaint dating from 1954. In more recent years, Agency employees have continued to express concerns through internal blogs and social media sites. While the methods of communication have changed, the complaints have remained substantially the same. The most common include the lack of parking spaces, inconveniently located parking lots, and reserved parking abuse.

The OIG believes that two major changes could potentially affect additional growth and related requirements across the NSAW, Ft. Meade campus in the future. First, the elevation of U.S. Cyber Command to a combatant command

could increase personnel requirements and increase the number of parking spaces needed. Second, Department of Defense (DoD) Instruction 4165.70, *Real Property Management*, 31 August 2018, states: “When possible, each DoD Component shall take prompt action to relocate activities accommodated in leased building space to Government-owned facilities, preferably located on military installations, and to dispose of excess leaseholds.” This requirement could result in additional personnel being moved out of leased facilities and into the Big Four or other NSAW, Ft. Meade buildings.¹

NSA/CSS Policy 9-5, *Traffic and Parking*, 7 December 2017, assigns responsibilities for managing the parking program to the Office of Logistics Services, which designated the Transportation and Travel organization as the Agency’s parking authority. While Transportation and Travel is the parking authority, they rely on multiple organizations within the Facilities Operations organization, specifically Civil and Structural Engineering, to assist in creating and executing parking and transportation initiatives. Within the last several years, the OIG believes that Installations and Logistics (I&L) has tried to lessen employee concerns and has worked to provide parking relief to employees by providing overflow lots and shuttle services, and by implementing various parking and transportation initiatives.

¹ For this audit, the term “Big Four” refers to the OPS1, OPS2A, OPS2B, and Headquarters buildings.



Figure 1. NSA Newsletter 1985.

Selected Parking and Transportation Initiatives

To determine the economy, efficiency, and effectiveness of parking and transportation initiatives at NSA, we requested a list of all the parking and transportation initiatives in the past five years. In order to get a complete list, the OIG consolidated listings of parking and transportation projects received from Transportation and Travel, and Civil and Structural Engineering. The consolidated list contained 50 projects from 2014 through 2019; 41 of those projects were related to paving. According to Civil and Structural Engineering, collectively those projects over the five years did result in approximately 200 spaces being added to existing lots; however, the OIG did not review paving projects and considered them to be more of a maintenance effort. From the balance, we judgmentally selected the following initiatives that we determined were specifically aimed at enhancing the employee parking and transportation experience:

Table 1: Parking and Transportation Initiatives

Initiative	Description	Cost	Status
Modular Parking Structure	Foundationless, single-story, steel, and precast concrete parking structure that installs over existing asphalt surface parking lot, adding 87 new spaces. The system is demountable and may be used in a permanent or semi-permanent manner.	\$3.6M	Demolished
Key2Park	Parking space counter system to help locate open spaces. The results are displayed on large message boards indicating if spaces are available in a specific lot.	\$1.5M	Inoperable
UDrive-It Boxes	Stores and organizes keys for government-owned vehicles used for transportation to meetings when shuttle service is not available.	\$130,000	Partially Implemented
300-Foot Fence Turnstile	Pedestrian traffic access through security barrier between Vehicle Control Points (VCPs) and the building entrance.	\$1.5M	Demolished
Bike Program	Green initiative that provides NSA government employees with transportation alternatives for traveling between NSA buildings for meetings.	\$186,000	Operating
TOTAL		\$6.9M	

We identified findings that highlight the lack of centralized strategic planning, poor initiative implementation, and ineffective monitoring of the Agency's parking program at NSA, Ft. Meade. For additional information about the audit objective, scope, methodology and criteria, see Appendix A: "About the Audit."

II. RESULTS OF THE AUDIT

FINDING 1: Agency parking and transportation initiatives lacked sufficient goals, plans, and strategies.

I&L had not established measurable goals, plans, and strategies for improving parking and transportation. This occurred because I&L had not identified parking as a problem and had not centrally managed parking and transportation initiatives. Without goals, plans, and strategies, initiatives were completed in an ad hoc manner with wasted funds and limited success. As a result, Agency employees have a negative perception about parking and continue to voice concerns, which negatively impacts employee morale.

The Agency Lacked Goals, Strategies, and Plans

According to 41 Code of Federal Regulation Ch. 102, section 74.310, federal agencies must take all feasible measures to improve the utilization of parking facilities, including conducting surveys and studies and periodically reviewing space allocations.

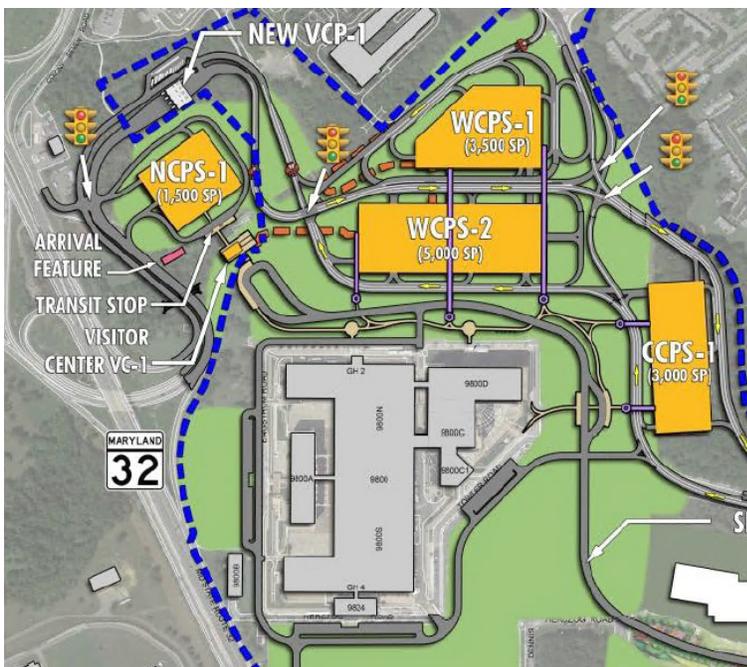


Figure 2. One option for parking structures around West Campus from 2014 Study.

As recently as August 2019, NSA had commissioned traffic-count studies that focused on collecting traffic volumes to determine the need for traffic lights near various Vehicle Control Points (VCP) and Vehicle Cargo Inspection Facilities. In addition, the Agency completed a parking study that was released in January 2014. According to Design and Engineering (D&E), the purpose of the 2014 study was to support recapitalization efforts by shifting parking to optimize the buildable area within the secure perimeter. Although not the direct intention, the study provided a detailed analysis of location, time, and basic cost estimates for different possible high-rise parking structures throughout NSAW, Ft. Meade (see Figure 2). However, the

Agency has not commissioned any additional parking studies since the opening of the East Campus parking garage in 2018. D&E stated that no new studies have been implemented both because efforts to add more parking are ongoing and because of their belief that East Campus garages were sized appropriately. After reviewing the studies that the Agency had conducted, the OIG expected to see near-term parking initiatives included in the Agency's facility and logistics future planning since, as discussed below, parking and transportation are included in "I&L 2019 Goals" and continues to adversely impact employee morale.

NSA's Master Plan. The OIG met with individuals in several organizations within I&L who stated they maintained approved plans for meeting I&L's goals. Military Construction provided NSA's Master Plan, dated January 2019, and Facility Operations provided the Fiscal Year Development Plans for the last five years. However, only one of the five initiatives we reviewed was included within these plans, as further discussed in Finding 2, and neither plan identified any future parking initiatives in the next 15 years.

NSA's Master Plan, which provides a long-term development framework in a phased approach and focuses on enhancing quality of life, advancing the mission, and recapitalizing aging facilities, includes an option to demolish West Campus and construct two new buildings with adjacent parking facilities (see Figure 3). However, it does not plan to achieve these or any parking and transportation improvements through the Master Plan's duration, which extends to the year 2035. In addition, we found that none of the actual parking initiatives we reviewed were included within I&L's Master Plan. The I&L Master Plan covers major construction projects, which may explain why smaller projects that have taken place over the last five years have not been included.



Figure 3: One option for West Campus as outlined in the Master Plan 2019; potential project date unknown.

NSA's Fiscal Year Development Plans. According to Facility Operations, the Fiscal Year Development Plan (FYDP) is a listing of current and near-future I&L projects that help prioritize and project funding execution over a five-year period. Projects are added to the plan based on customer and I&L management requirements received from data calls and leadership meetings. As mentioned above, I&L management stated they prioritize projects based on available funding and mission impacts. The FY14-19 and FY15-20 Fiscal Year Development Plans included the Key2Park system but did not include the other four parking initiatives that we examined. In addition, we did not find any new parking or transportation initiatives included within the plan.

Failure to Identify the Parking Problem

Low Prioritization

According to "I&L 2019 Goals," goal two was to "Deliver services that drive NSA mission success and enhance employee experience." To meet this goal, I&L stated that they would "tailor food service, morale and welfare programs, and parking and transportation, to best meet the needs of a dynamic and changing workforce." I&L management could not provide documented strategies or plans specifically for parking and transportation initiatives that align with the established "I&L 2019 Goals." When we spoke to I&L management, they stated that overflow parking lots are not full and that there are enough parking spaces for employees. In addition, an I&L senior manager stated they did not have a problem parking their personal vehicle and parking is more of a convenience or perception problem among employees, not an availability problem. However, the OIG notes that most managers we interviewed during this audit, including this senior manager, had the benefit of parking in a senior or executive assigned parking spot and did not experience on a daily basis the issues about which the general population has been concerned.

The OIG asked I&L management how initiatives are prioritized and they explained that projects to be carried out are determined by the available funding and priorities based on 1) mission, 2) life safety, and 3) benefit for the workforce. Their most current priorities are focused on East Campus construction, recapitalization, and sustaining the campus; parking was described as a "nice to have" and not an immediate concern. OIG determined that parking is considered to be a low priority for I&L.

Funding Not Requested

The OIG asked I&L if the Agency has ever asked for additional funding from Congress to fund a parking and transportation initiative or a stand-alone parking structure. Multiple I&L managers stated that they did not believe that Congress would fund construction costs of a parking structure that was not associated with or attached to a new building. In addition, an I&L project manager said that Congress frowns on the idea of actual parking garages at NSA because NSA personnel do not pay for parking, and their thought is if Congress and other federal agencies in Washington, D.C. have to pay for parking, it should not be free at NSA. In addition, I&L management stated that it would be challenging to displace individuals for two years while a new garage was under construction and the cost of the shuttles and overflow parking would be significant. I&L management could not cite any examples in which the Agency asked Congress for funds to support a standalone parking structure or in which the unwillingness to fund standalone parking structures was communicated. However, the OIG found that Congress recognizes parking as a problem at the Agency, as discussed below.

In 2017 and 2018, the House of Representatives Military Construction, Veterans Affairs' and Related Agency Appropriations Bill for FY18 and FY19 identified parking as a problem at DoD facilities. The FY18 bill, House No. 115-188, directed the Secretary of Defense to provide a list of unfunded requirements for parking facilities, access control points, and road construction at DoD facilities that have serious parking, access, and road congestion issues, but this language was not codified into the law. However, the FY19 House bill, No. 115-673, in the Joint Explanatory Statement of the Committee of Conference H.R. 5895, passed by the House and Senate in June 2018, specifically highlighted the parking situation at NSA:

The conferees are concerned that Military Construction budgets constraints are negatively affecting the ability of the Department of Defense to address urgent parking requirements at certain U.S. military installations. The lack of parking is a safety issue and a detriment to the well-being of employees, both civilian and military. The conferees are concerned that the Department does not have a coherent strategy to address the growing parking requirements at installations that have significant growth. For example, Fort Meade, which already was home to the National Security Agency, became the headquarters of the newly formed U.S. Cyber Command in 2010. By 2011, the Defense Information System Agency, which handles the Pentagon's IT and communication needs, had moved onto the base. In 2005, the base had just over 33,500 employees. Today it has about 57,000, more than double the number of workers at the Pentagon. As a result of this growth, parking at Fort Meade has become a serious issue. Therefore, the conferees direct the Secretary of Defense to submit to the Committees with the fiscal year 2020 military construction budget request: an updated list of unfunded requirements for parking facilities, access control points, and road construction at DoD facilities that have serious parking, access, and road congestion issues. Finally, the Secretary is further directed to submit, with the fiscal year 2020 military construction budget request, a list of how those requirements will be incorporated into their construction requests for fiscal years 2021 through 2025.

The OIG reviewed DoD's response to the FY19 budget and found that NSA Ft. Meade was not mentioned in the report as having any unfunded parking requirements.² Both Legislative, State, Local & Academic Engagement Office, who coordinates all communication and relationships between the U.S. Congress and NSA, and Military Construction stated that DoD did not contact the Agency to assist in a response. In addition, the OIG asked Military Construction why, even though not required, the Agency did not proactively contact DoD, and Military Construction stated the Agency did not have a feasible plan to offer Congress.

No Central Management for Parking and Transportation Initiatives

As described in the "Background" section of this report, NSA Policy 9-5 designates the Office of Logistics Services as the Agency's parking authority. However, the OIG determined that because multiple I&L organizations play a role in executing parking and transportation initiatives, it is challenging for the Office of Logistics Services to manage and set goals, plans, and strategies specifically for parking and transportation initiatives. Therefore, the OIG believes that the Agency should designate one organization within I&L to take responsibility for overseeing and managing all parking

² An unfunded requirement is presented to Congress outlining a spend plan if more money was available. Typically, unfunded requirements include a plan, impact statement, prioritization, and accurate pricing.



and transportation initiatives to ensure that goals, plans, and strategies are developed, prioritized, and being met. In addition, having one organization centrally manage parking and transportation initiatives would ensure that the Agency is positioned to respond to Congressional or other requests with specific plans that could support additional funding.

RECOMMENDATION AU-19-0013-1

Update NSA/CSS Policy 9-5 to assign a specific organization the responsibility for developing parking and transportation plans and strategies that will identify the needs of the workforce and enhance the employee’s parking experience, in accordance with I&L goals.

(U) LEAD ACTION: Director, Workforce Support Activities (WSA)

Inconvenient Parking

In 2018, phase one of the East Campus parking structure was completed and opened, consisting of approximately 38 percent of the total spaces. In October 2020 the rest of the garage was completed; however, as of February 2021, the new sections consisting of approximately 62 percent of the total spaces still remained closed to install a parking guidance system. When this expansion is complete there will be more parking spaces than civilian, military, and contractor personnel at NSAW, Ft. Meade.

Table 2: Parking at NSAW, Ft. Meade as of October 2019

Location	Parking Coverage (parking spaces / individuals)
West Campus (Big Four/SAB1)	76%
Central/South Campus (SAB 2/3/4, RE, SPL)	113%
East Campus	337%
Total	104%

^ Does not include individuals without an assigned work space (Food Prep/Cleaning/Maintenance)

DoD Unified Facilities Criteria (UFC) 3-201-01, *Civil Engineering*, dated 1 July 2019, sets guidelines that DoD facilities provide parking spaces for 60 percent of assigned personnel. As shown in Table 2, the Agency is meeting the threshold in all NSAW, Ft. Meade lots. However, the OIG questions if 60 percent is an optimum coverage to meet employees needs at NSAW, Ft. Meade given the lack of convenient mass transportation and the civilian population size, and based on the West Campus percentages identified in Table 2 of approximately 24 percent of individuals, not including visitors, unable to park on a daily basis around the West Campus. Furthermore, Criteria 3-201-01 appears more suited for a traditional DoD military base facility, as opposed to a component unit’s headquarters, as the criteria provides optimum parking coverages based on building type such as administrative, credit unions, dining facilities, police stations, fitness centers, and medical facilities; however, West Campus



encompasses all of those functions. When the OIG asked how this guidance applies to West Campus, D&E was unsure how to interpret the criteria but provided the Agency-developed guidance that was used for East Campus.

Through email exchanges with Agency designers, I&L established an optimum parking goal of 90 percent when designing the East Campus. However, this goal is not represented in I&L policy or standard operating procedures. Further, I&L has not discussed or documented how this new goal is applied to any existing facilities at the Agency. Additionally, the OIG questions if the 76 percent coverage in West Campus is adequate based on the new 90 percent criteria that was developed for East Campus. Specifically, the OIG reviewed the location of the NSAW, Ft. Meade lots and found that they are significantly spread out for many employees working in the Big Four and are not compliant with new construction standards.

The UFC system is prescribed by MIL-STD 3007 and provides planning, design, construction, sustainment, restoration, and modernization criteria to Military Departments and Defense Agencies. UFC 3-201-01 section 2-9.6 requires users to “Design parking areas in accordance with the United States Army Military Surface Deployment and Distribution Command Transportation Engineering Agency (SDDCTEA) Pamphlet 55-17.” SDDCTEA, which executes the DoD’s overall transportation engineering program on behalf of the military services, Pamphlet 55-17, *Better Military Traffic Engineering*, dated 2016, states, “[P]eople are generally unwilling to walk more than 1,000 feet from their parking space to reach their destination.” In addition SDDCTEA-issued Traffic Engineering and Highway Safety Bulletin 12-02, *Parking Lots and Garages*, April 2012, indicates that work-related parking should be 500 feet or less from the parking areas to the buildings they serve, as outlined in Table 3 below. According to the Agency’s Civil & Structural engineering organization, this guideline is applicable and generally followed for new construction and, therefore, it is not applicable to the Big Four since parking there was constructed decades ago.

Table 3: U.S. Army Military Surface Deployment and Distribution Command Transportation Engineering Agency’s Common Walking Distances for Parking

Parking Characteristics	Average Walking Distance (feet)	Corresponding Circle Color in Figure 4 below
Average, preferred for suburban areas	500	Red
Long-term parking in central business districts	1,000	Blue
Special or sporting events	1,500	Yellow
Maximum	3,000	Green

The majority of the unreserved parking spaces surrounding the Big Four area exceed 500 feet from the building entrances, the latter of which is represented by the red circles in Figure 4.³ The remaining circles—blue, yellow, and green—represent long-term, event, and maximum parking distance respectively. The OIG believes that the Agency has ameliorated the inconvenience of these parking lots to some extent by offering shuttle services from overflow parking lots around NSAW, Ft. Meade.

³ The OIG recognizes there are five entrances into the Big Four; however, we chose the two entrances closest to the majority of the unreserved parking to highlight within Figure 4.



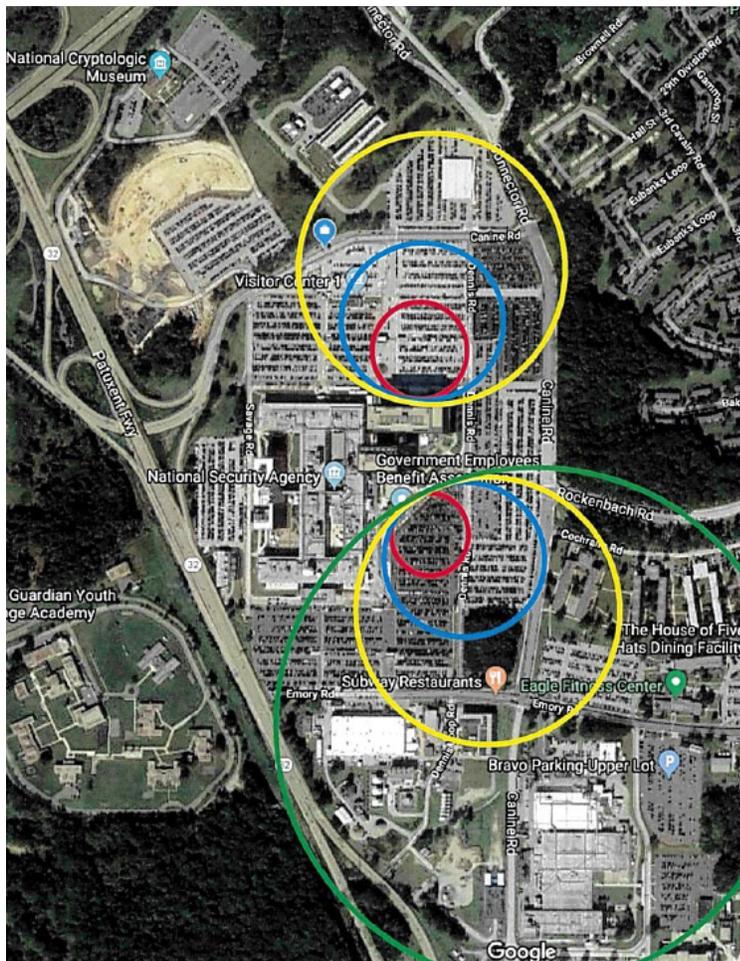


Figure 4: Parking Diagram

successful and wasted a total of \$6.7 million. According to the Agency’s Civil & Structural engineering organization, they believe that risk mitigation is part of I&L’s goals and although not monetary cost savings, the removal of turnstiles, as discussed in Finding 2, did enhance the safety of employees. We found that I&L did not effectively set priorities, plan for the future, focus resources, and ensure that parking and transportation met the needs of a dynamic and changing workforce. Findings 2 and 3 discuss additional specific control deficiencies that were identified during the review of each initiative.

Poor Morale

Failed initiatives and the failure to recognize parking as a problem at the Agency have affected employee morale. The OIG reviewed multiple collaboration tools and Agency blogs such as *JournalNSA*, *Parting Thoughts*, and *Tapioca* and found hundreds of posts and comments concerning parking. Some notable parking comments addressing morale that occurred in 2019 and 2020 are as follows:

“I didn’t want to walk a quarter to half a mile or shuttle in every day only to pass by empty parking spaces designated for the elite (non-medical privileged parking needs to go).” Posted in *Parting Thoughts*.

We found that the Agency budgeted in FY20 approximately \$700,000 per year on each shuttle and, with closer parking, could potentially remove three parking shuttle services that run from overflow lots, specifically the Cryptologic Museum area/VCP1, the Bravo Lot, and East Campus, costing approximately \$2.1 million. While the audit did not review these shuttle services as this initiative was not implemented within the past five years, the OIG questions whether some of the shuttles could be eliminated, potentially cutting costs if parking was more convenient for employees.

Failed Initiatives

The OIG believes that the related factors of low prioritization, the belief by I&L that parking is not a problem, and the lack of goals, plans, and strategies have combined to have an adverse impact on the success of recent parking and transportation initiatives. As identified in the Background section, four out of five of these initiatives were not

“Parking is growing progressively more daunting (people should be able to park at their job).”
Posted in *Parting Thoughts*.

“Things I won’t miss: Parking - This is not a Senior vs. Other issue, it is simply running out of spaces as buildings are packed more tightly.” Posted in *Parting Thoughts*.

“I purposely looked for a jobs [sic] at smaller buildings, where parking wasn’t a problem.”
Posted in *Parting Thoughts*.

“I have worked until 8 or 9pm off-and-on for years. Once parking was moved outside Agency controlled spaces, I started moving my car in the afternoons. I did not feel safe walking alone for significant distance in the dark lots late at night. And [I] have no qualms against doing that ‘on the clock’ since [my] employer refuses to provide adequate parking and/or transportation at the time you need it.” Posted in *Tapioca*.

“After I&L recommended the East Campus parking garage as satellite parking, combined with reconstitution [of] the workforce, the garage has been approaching maximum capacity during the workday.” Posted in *Tapioca*.

“My Flexible work schedule feels much less flexible when I’m planning my day around parking. The refrain that runs through my mind while I’m serpentine [sic] through the parking lots on a [designated late arrival day] or after a morning doctor’s appointment is ‘I just want to go to work. Why can’t I just go to work?’” Posted in *Parting Thoughts*.

As mentioned above, pursuant to 41 Code of Federal Regulation Ch. 102, section 74.310, federal agencies must take all feasible measures to improve the utilization of parking facilities, including conducting surveys and studies and periodically reviewing space allocations. However, the Agency has never conducted an employee survey specifically regarding the parking situation at NSAW, Ft. Meade, and therefore cannot determine authoritatively the extent to which parking issues are hurting employee morale. Moreover, such surveys can give employees a specific and constructive channel for expressing their thoughts and opinions. In addition, without conducting a survey the Agency could be sending or reinforcing a message that parking is a low priority for it despite such concerns on the part of the workforce.

RECOMMENDATION AU-19-0013-2

Upon completion of Recommendation AU-19-0013-1, conduct a study of parking at NSAW, Ft. Meade, including a workforce survey, and use the results to develop a comprehensive parking and transportation plan, and strategies to achieve it, that align with I&L goals.

LEAD ACTION: Director, WSA

FINDING 2: Agency parking and transportation initiatives had significant internal controls deficiencies.

Significant deficiencies existed in the management of the Agency's parking and transportation initiatives. This is because I&L failed to implement a process for managing large parking and transportation projects that included basic internal controls, including a consistent process for developing, approving, and implementing such initiatives. As a result, we found that four of the five initiatives we reviewed were demolished, inoperable, or only partially implemented.

Parking and Transportation Initiative Management Deficiencies

We found that parking and transportation initiatives were managed in an ad hoc manner and without consistent processes. As described below, the OIG found that management deficiencies resulted in these initiatives failing to meet their intended purposes in various ways.

Modular Parking Structure - Parking Initiative

During the design and construction phases, internal concerns were raised over the safety of the structure. These concerns could not be resolved and, by October 2019, the structure had cost the Government approximately \$3 million and then was demolished at a cost of \$500,000 without ever being used. See Finding 3 for a detailed discussion of specific issues and failed processes related to the modular parking structure.

Key2Park System - Parking Initiative

According to I&L, to save costs, the Key2Park system was not installed with a sensor in every space (as is done in airport parking systems, for instance), but instead used a system of copper wire inductive loops sensors only at the entrance/exit of certain lots. The Project Manager was concerned about the accuracy of the signs, which was questionable from the beginning due to factors such as multiple entrances/exits, miscounting cars based on the number of axles, and driving patterns of employees. However, the project manager stated that during commissioning of the system, the counts were verified as 95 percent accurate. Furthermore, a contract modification was made to address electrical issues, such as water entering the base of the signs, which caused electrical shortages. Additionally, the building that housed the communication equipment was struck by lightning twice, which created extended outages. In 2020 part of the system was dismantled during the construction of Vehicle Control Point (VCP)1, causing the entire system to be unusable. Key2Park has not been reinstalled since, and I&L management said they were unsure about its future use. I&L did consider lessons learned from this project and made changes to the housing of the equipment during the installation of the new East Campus parking garage space counter system.

UDrive-it Program - Transportation Initiative

The Agency purchased 14 boxes at a cost of approximately \$130,000 from 2010 through 2015 to house UDrive-It keys, which are attached to preexisting I&L self-service Scan-It kiosks. Ten years

after the initial purchase, 2 of the 14 boxes (14 percent) were operational, 9 boxes were installed but waiting for software support from the Capabilities Directorate, and 3 boxes were still in storage. We found that the installation for these boxes was not prioritized by I&L. In addition, effective utilization of the program could potentially reduce government-owned fleet assigned to specific organizations, consisting of approximately 267 vehicles parked around NSAW, Ft. Meade, though usage of the UDrive-It vehicles may be dependent on parking availability.

300-Foot Fence - Turnstiles - Transportation Initiative

The 300-foot fence line is the middle layer of physical security protection between the VCP entrance and the building entrance and was installed in 1987. The fence provided enhanced stand off from NSA facilities and Vehicle Check Points to screen traffic entering the campus. The OIG was told that the fence forced employees to enter/exit through designated turnstiles and created potentially unsafe pedestrian routes. Since 2015, three additional turnstiles have been installed in the 300-foot fence line around the Big Four to help with the flow of pedestrian traffic and eliminated the need for a guard to monitor the entrance, costing approximately \$1.5 million. The most recent turnstile was installed in July 2018. However, a month before the completed installation of this turnstile, I&L initiated a new project to remove the 300-foot fence, including all the newly installed turnstiles based on the upgrade of the Anti-Terrorism Force/Protection Plan, which allowed the fence removal to occur because of the completion of the new VCP1. As a result, in February 2020, all turnstiles along the 300-foot fence were disabled and are no longer being used.

Bike Program - Transportation Initiative

The Agency in July 2016 announced this green initiative, which provides NSA government employees with transportation alternatives for traveling between NSA buildings for meetings. This was the only parking and transportation initiative reviewed by the OIG that is fully operational as intended; therefore, we conducted testing to review its effectiveness.

From 2016 through 2018, the Agency purchased 77 bikes and 22 bike racks. In 2019, the Agency purchased an additional 63 bikes and 23 bike racks using Innovation Award Funding.⁴ With the additional purchase in 2019, the Agency had a total 140 bikes and spent \$186,375 on bikes. Additionally, the Agency spent \$21,050 on maintenance contracts to service the bikes. According to the Commuter and Transportation Center (CTC), the Agency's parking authority, 460 participants had signed the Bike Share User Agreement form. As highlighted in Tables 4 and 5, the cost per bike at the start of the program in 2016 was \$949 (investing approximately \$608 per user as there were 78 users registered in 2016). However, in 2019 the cost per bike, which now had additional features such as run flat tires, increased by 74 percent, costing \$1,650 per bike (investing approximately \$1,019 per new user, as there were 102 new users in 2019). The OIG questioned this investment; however, the Agency could not provide any analysis or justification of why the cost or number of new bike purchases was warranted.

⁴ The Predictive Analytics & Innovation team under I&L provided the Innovation Award Funding for the additional bikes and racks.

Table 4: Comparison of Bike Purchases

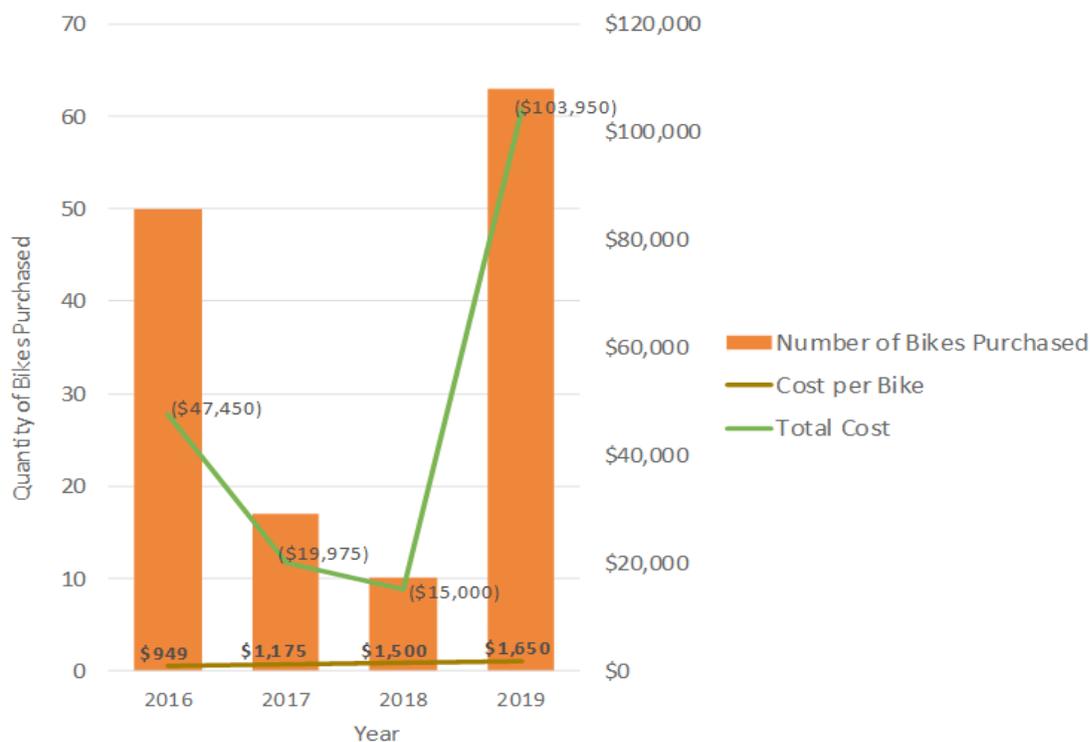
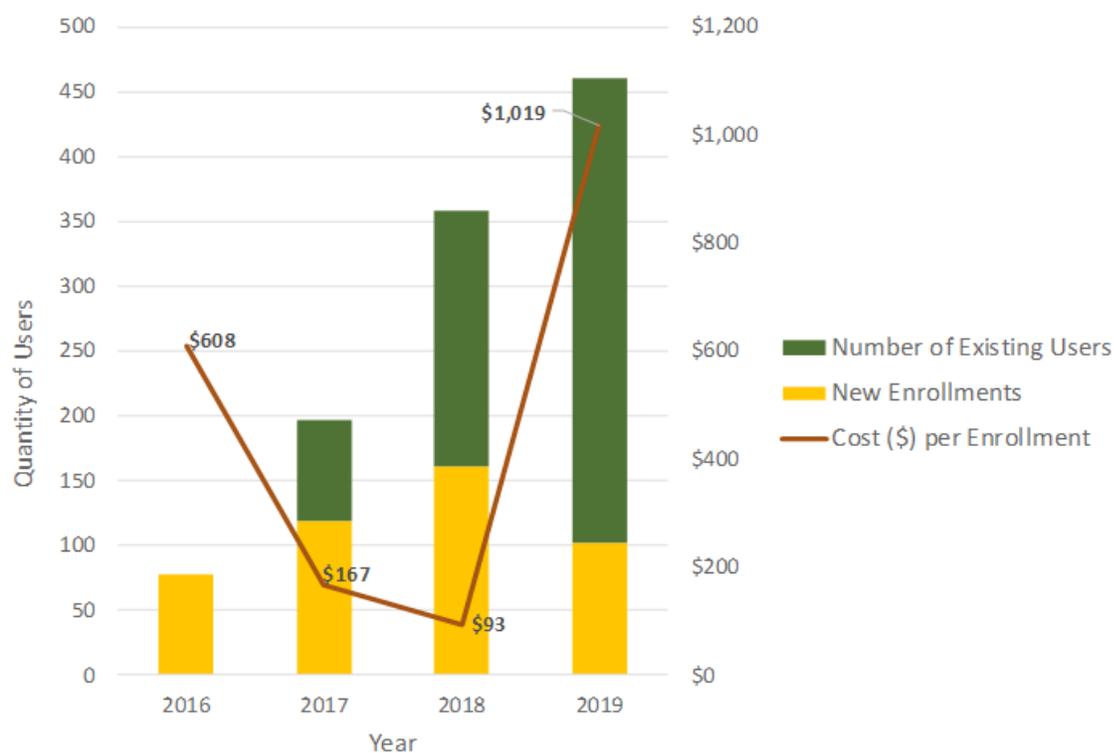


Table 5: Number of Users to Bikes Purchased



The OIG also visited eight racks twice a day for one week to track the movement of the bikes. From the test we observed 36 of the 140 bikes (26 percent) and found:

- 6 of the 36 bikes (17 percent) did not move at all, and
- 5 of the 36 bikes (14 percent) moved less than three times.

During the review, we found that the Bravo/OPS 2A Right/HQ Racks, which are located along the sidewalk outside of the Big Four buildings, saw the most bike movement with 13 to 14 bikes parked/moved throughout the week. Additionally, the OIG concluded the most movement occurred during the morning and afternoon rush hours. The NSA Bike Share Program User Agreement states that “bikes are only for use by government employees and for official government use only for transportation between buildings on the NSAW campus.” The OIG questions whether the bikes located in these areas are being used for their intended purpose for commuting between buildings or as an option to get to the buildings quicker from the overflow parking lot in the mornings by bypassing the shuttles. In addition, we found that CTC’s website stated that the bikes were equipped with GPS capability; however, they were not.

CTC explained that not all 140 bikes are available for use. The 50 bikes purchased in 2016 are now in storage and not being used by the Agency because they were purchased with regular bike tires, which over time go flat. Newer bikes are being purchased with “no-flat” tires. However, CTC has discussed moving the 50 bikes from storage to field locations since they are still in working condition, though it is unclear to the OIG why no-flat tires could not have been purchased for these bikes or their existing tires could not have been re-inflated.

CTC told the OIG that they plan to purchase more bikes in the future, even though the program is currently operational, and the OIG questions the methodology and justification for purchasing additional bikes as well as the need for them based on the cost and utilization statistics developed by the OIG as outlined above. CTC could not provide any documentation to support the number of bikes being purchased or a future plan for doing so.

Agency Parking Initiatives Lack Internal Controls

The OIG found that I&L had a process for managing large construction projects; however, we could not identify a consistent process for parking and transportation initiatives. I&L employees stated that they do not have a process specifically for parking and transportation initiatives because projects are rare and are significantly different from the typical I&L project. During our review of the initiatives, we found multiple control deficiencies that we believe were due to a lack of a consistent process. (See Table 6).

Table 6: Parking Initiatives Control Deficiencies Found

Identified Control Deficiencies	Modular Parking*	Key2Park	UDrive-It	Turnstiles	Bike Program
Lack of Segregation of Duties					
Concerns closed by Project Manager without documented approval	X	N/A	N/A	N/A	N/A
Initial project approval	X	X	X	X	X
Lack of Documentation					
Risk acceptance/mitigation	X		X	X	N/A
Prioritization	X		X		X
Poor Operational Management					
Ineffective operations and maintenance	X	X	X	X	N/A
Undetermined future	N/A	X	X	N/A	N/A

*See Finding 3 for discussion on modular parking structure control deficiencies.

According to the Government Accountability Office's *Standards for Internal Control in the Federal Government* (Green Book), September 2014, "An internal control system is a continuous built-in component of operations, effected by people, that provides reasonable assurance, not absolute assurance, that an entity's objective will be achieved."

Segregation of Duties

The OIG found that parking and transportation projects did not follow a consistent process with a clearly defined segregation of duties. In contrast, for space renovations, NSAW organizations outside I&L relied on Corporate Space Liaisons at sub-directorate level, the NSAW Space Council, and Installation Planning to provide oversight, ensure that requirements were valid, and prioritize, approve, and act as an advocate for all renovations within NSAW. The approval process was formally documented through various approval stages, involving multiple organizations, and tracked in ARCHIBUS.⁵ However, we found that parking and transportation projects (internal I&L projects), which the OIG considered to be similar to space projects in terms of scope and cost, did not follow such a process or have such a clearly defined segregation of duties.

The OIG did find a project or requisition approval for the five parking and transportation initiatives. Nevertheless, CTC stated that they were not consistently aware of the parking and transportation initiatives, were not included in initial discussions of the selected initiatives, and in some cases were not involved even after the approval. For example, CTC stated a former Chief of Office of Logistics Services originated, prioritized, and approved the Agency's bike program without consulting CTC, which only became aware of the initiative once it was time to oversee the program.

⁵ ARCHIBUS is I&L's space management module and location authority, indicating final approval and funding.

Although I&L welcomes and encourages employee ideas for improvements, the OIG concluded there was no segregation of duties within the approval process and no centralized authoritative group within I&L to provide oversight for approving, addressing concerns, and prioritizing initiatives. The OIG believes that these parking and transportation initiatives may well have been more successful if a consistent and standard process had been followed throughout each phase of implementation, which would have allowed problems or disagreements to be addressed sooner in the process.

Lack of Documentation

A risk assessment is one of the five components of internal control required by the Green Book. Of the five initiatives, Key2Park was the only project found on Vulnerability and Process Assessment (VPA).⁶ The Commuter & Motor Fleet included the Key2Park system on their FY2019 VPA. Commuter & Motor Fleet cited that the system was at risk of unauthorized access, which could result in the inaccurate display of parking lot data or unsuitable messages displayed on the board. Commuter & Motor Fleet accepted the risk and documented the inherent likelihood and impact as medium.

In addition, I&L also could not provide any documentation to support a consistent process for prioritizing parking and transportation initiatives. The OIG believes that because initiatives are done sporadically and there is no centralized organization responsible for prioritizing initiatives, the process is inconsistent and not repeatable.

Poor Operations Management

Four of the five initiatives reviewed failed once they were operational. I&L did not have a plan for the future of these initiatives. For example, I&L management stated they were unsure if I&L would continue to use the UDrive-It technology and, therefore, would not dedicate resources to complete the installation. I&L management was also unsure of Key2Park's future, saying that contractors would reinstall the equipment during the construction of VCP1. Additionally, CTC told the OIG that they have limited resources and that other projects, such as American Disability Act compliance, take precedence over these initiatives.

An undocumented process that allows personnel within I&L to initiate, prioritize, and approve initiatives without segregation of duties and assessment of risk can result in failed initiatives. Without appropriate documentation and operations management, there is a significant risk that such projects will be unsuccessful and wasteful—and, given the importance of these issues to the workforce, will adversely impact the workforce's morale.

⁶ In accordance with NSA/CSS Policy 7-3, Managers' Internal Control Program, 13 September 2019, NSA/CSS managers shall conduct a Vulnerability and Process Assessment to determine their organization's potential risk for fraud, waste, abuse, and mismanagement of Government resources.

RECOMMENDATION AU-19-0013-3

Update Policy 9-5 to designate a team comprised of the designated parking authority and other appropriate stakeholders to document and manage the process for originating and developing parking and transportation initiatives, including but not limited to ensuring:

1. Alignment with established parking and transportation goals and future initiatives,
2. Appropriate approvals and prioritization, and
3. Evaluation of risks, to include acceptance and mitigation efforts.

LEAD ACTION: Director, WSA

FINDING 3: I&L constructed a parking garage that could not be used and was demolished.

The Agency constructed a modular parking deck that had never been built in the United States before. Due to safety concerns identified after completion, the Agency ultimately demolished the parking deck without ever using it. Lack of internal controls related to project oversight, risk assessment, and dispute resolution ultimately resulted in the waste of approximately \$3.6 million.

Background

In 2014, a Project Manager (PM) within I&L searched for ways to improve parking at NSAW and found a proprietary modular, demountable, single-story parking structure designed with a foundationless system that used a network of columns and baseplates attached to an asphalt surface. According to I&L management, the structure could be constructed quickly and at a low cost, as it was a Commercial-Off-the-Shelf (COTS) product. The Agency believed that the structure would provide between 150-250 additional parking spaces within the N8/N9 lots of NSAW campus and would help to alleviate parking congestion.

According to the PM, similar modular parking structures had been constructed throughout Europe; however, the patent used for this modular parking structure had never been constructed in this country and was modified to accommodate larger size vehicles and installation on an asphalt foundation as opposed to concrete.



Figure 5: Modular Parking Structure – Patent Owner's rendering on the left and NSA's modular parking structure on the right.

Although other companies had successfully constructed similar modular parking structures in the United States, the Agency received only one presentation for a modular parking structure, which was from the patent owner (see Figure 5 for a rendering included in the patent owner's initial presentation in December 2015 and NSA's parking structure). According to I&L management, the other companies were only willing to lease their structure. An I&L Project Manager explained that the Agency had difficulties with previously leased equipment and they believed it would be a good investment for the Agency to own the structure.

At the parking deck's completion, the number of added spaces was significantly lower than originally planned to lower the cost of the garage. The Agency received 87 parking spaces and paid approximately \$34,000 per space. In contrast, the permanent East Campus parking structure that opened in 2018 cost approximately \$25,000 per space. After approximately one year of various safety testing, a professional disagreement concerning the safety of the modular parking structure developed between the Agency's I&L Design and Engineering (D&E) team and the external engineering firm. Ultimately, I&L management acknowledged the safety risk and demolished the structure in the fall of 2019 at a cost of approximately \$500,000.

No Independent Oversight of Construction Project

The Agency awarded a \$2.9 million Section 8(a) small business/sole source/firm fixed price contract in September 2017 to a construction service contractor to construct the modular parking system. According to I&L's Business Management & Acquisition's Team Lead, \$130,264 of the funding used to purchase the parking system was set to expire on 30 September 2017, approximately two weeks after the contract was awarded. The construction service contractor's previous experience included the Starbucks installation in OPS2A and the FANX Auditorium. At the request of the patent owner, the construction service contractor subcontracted the design and engineering to an architectural firm, which helped the patent owner with design documentation during the initial modular parking structure development. The architectural firm's previous experience included designing a waterfront development consisting of a convention center, hotels, restaurants, shops, and condominiums.

The Agency used minor military construction funding, which at the time had a \$3 million project threshold, to award the \$2.9 million contract. In order to stay below that threshold, the Agency reduced the number of parking spaces (as discussed above), did not address building codes that they determined did not apply to this type of structure, and chose to manage the project internally without the use of the U.S. Army Corps of Engineers (USACE). Per discussion with I&L management, this enabled the Agency to avoid a flat rate of 5.7 percent of construction cost that USACE charges for supervision and administration support.

The OIG concluded that in the absence of independent oversight from the USACE, the Agency bypassed fundamental controls, which resulted in a significant amount of risk being accepted without documentation or mitigating efforts, ultimately leading to the failure of the parking initiative.

Contracting Management

Though encouraged by the Government to support small business development, 8(a) sole-source contracts allows the Agency to bypass the standard source selection process, an important pre-award procurement process. Although the source selection process can be lengthy, it provides for independent evaluation of multiple vendors to determine the best value to the Agency. When asked how Contracting and I&L selected the construction service contractor, neither office could provide the OIG with any documentation to support awarding the contract for an innovative parking structure that had never been built in the United States to a vendor with no previous parking structure experience. Contracting did provide the OIG with the Small Business Association (SBA) approval; however, the OIG did not find any additional support to show that the Agency evaluated the construction service contractor's expertise for constructing a new concept parking structure.

Contracting further stated that maintaining this type of documentation was not required by the Federal Acquisition Regulation (FAR). However, the OIG found that FAR Part 9, *Contractor Qualifications*, Section 9.104-1(e) states:

To be determined responsible, a prospective contractor must - Have the necessary organization, experience, accounting and operational controls, and technical skills, or the ability to obtain them (including, as appropriate, such elements as production control procedures, property control systems, quality assurance measures, and safety programs applicable to materials to be produced or services to be performed by the prospective contractor and subcontractors).

Although a documentation requirement may not exist within the FAR, the OIG questions why the Agency would not maintain evidence of a contractor's qualifications for this type of groundbreaking construction project. Moreover, D&E personnel told the OIG that they felt that the project award was rushed by I&L leadership compared to other projects and that I&L senior leadership was more actively involved in the success of the project.⁷

RECOMMENDATION AU-19-0013-4

Implement a process to ensure that when awarding a parking and transportation contract, documentation is maintained to support that the contractor selected has the expertise to fulfill the contract requirements.

LEAD ACTION: Director, Business Management & Acquisition (BM&A)

United Facilities Criteria Waiver

Throughout the award process, terms and requirements of the construction service contractor continued to change in order to save money. For example the Statement of Work (SOW) stated:

The project shall conform to all applicable Federal, State and local laws, regulations, and applicable General Building Requirements, Unified Facilities Criteria (UFC) as noted below, and all applicable MPO specified Facilities Criteria (FC's). Where there is a conflict between the referenced standards, the most stringent shall take precedence. Any conflicts between referenced standards shall be brought to the attention of the COR for resolution.

According to I&L management, the UFC codes, which provide criteria for planning, design, construction, sustainment, restoration, and modernization, were removed because I&L believed the codes were not applicable to this new type of structure and it would be too costly to comply with criteria. However, the OIG found email documentation from the construction service contractor stating that the Agency "waived the requirement to comply with local or state jurisdictions that would not understand the design and might not approve it." UFC 1-200-01 Building Codes section 2-1.4 paragraph 104.10 "Waiver and Exception Supplement" states:

⁷ In the *Audit of NSA's Facilities and Logistics Services Contract*, dated 30 September 2020, the OIG found the Agency failed to document the justification of other sole-source 8(a) awards.

Avoid requests for waivers and exemptions if possible. A criteria- or code-compliant engineering solution for the facility should be the objective versus a waiver or exemption request. UFC and FC requirements are intended to address code-complaint facility requirements; life, health and safety requirements; property loss prevention; lowest lifecycle cost; and facility operational requirements. For issues dealing with life, health, and safety, cost is not a valid reason to grant a waiver or exemption. Waiving or exemption requirements typically results in increased risk to safety or property loss, increased operational risk, or poor return on investment.

The decision to remove the codes was made during the contract proposal stage; however, the OIG did not find any updates to the SOW or contract modifications documenting these changes and the risk associated with their removal. Contracting stated that the contract did not need to be modified because the SOW stated “as applicable” and that the removal was further approved by the Agency during the Issued for Construction Drawing phase. During this phase a set of drawings and specifications are approved by a licensed engineer and presented to the Agency for final approval before construction. The OIG found the Agency does now have a process for documenting waivers from the UFC; however, when the parking structure began, the waiver process was not standardized or routinely implemented. In addition, the manager within Military Construction and Agency engineering staff stated that they could not recall another project in which the Agency tried to remove all the UFC requirements.

RECOMMENDATION AU-19-0013-5

Establish a policy that requires the use of a wavier process for documenting when some or all UFCs are removed in parking and transportation projects.

LEAD ACTION: Director, WSA

Construction Management

Based on discussions with Military Construction personnel and the Office of General Counsel (OGC), the OIG learned the USACE manages construction for military construction-funded projects within Fort Meade, where NSAW resides. However, in March 2017, the Agency was granted a waiver from USACE, which delegated the military construction-funded project management to the Agency. The basis of the waiver request centered on the fact that the modular parking deck was a COTS system that required assembly rather than a construction contract. Obtaining the waiver removed USACE oversight and allowed the Agency to internally manage the project through Military Construction, which, according to I&L leadership, saved both time and money. Although the Agency has a blanket waiver in place with the USACE for small maintenance projects such as paving, the OIG was told that this was the first time a waiver was granted for a military construction-funded project, and the first time such a construction project was managed through Military Construction.

The OIG found documentation dated May 2017, two months after the USACE waiver was received, in which the Project Manager, Design Lead, and OGC discussed whether the parking deck was a small military construction-type project or a COTS product. According to an email from OGC, it was believed to be a small military construction-type project rather than a COTS purchase. However, the

USACE waiver, which was awarded based on a COTS installation, was still applied to this project and construction continued. Regardless of the classification of the project, without additional independent oversight, I&L was able to bypass internal controls, as mentioned in Finding 2.

RECOMMENDATION AU-19-0013-6

Document roles, responsibilities, and a process flow for ensuring sufficient oversight for construction projects managed internally without the assistance of DoD or outside entities, like the Army Corp of Engineers.

LEAD ACTION: Director, WSA

Internal Professional Disagreements

The Agency D&E team told the OIG that from the beginning of the project they had concerns over the safety of the structure, specifically seismic, relating to earthquake or vibrations, and crash impact concerns. D&E told the OIG that they voiced these concerns during the Issued For Construction (IFC) meetings with I&L management. The OIG found documentation that contained D&E's concerns, but those concerns were marked "closed" or resolved by the PM, which enabled the project to move forward to construction. According to the PM who closed the concerns, the architectural firm was aware of D&E's concerns, but said they would be able to prove the parking deck's safety once it was fully constructed, as there were no codes or previous examples upon which to base safety calculations on the innovative design. The concerns were closed by the PM who told us that the Agency trusted the architectural firm designs that were "stamped" and certified by a Professional Engineer working within a well-established company.⁸ However, the OIG obtained an email from the PM proving that he had met with I&L leadership and they confirmed their intent to proceed with the project despite the concerns. However, this email did not document identified risks that I&L was willing to accept or mitigation efforts to address such risks.

Safety Testing and Reviews

Multiple tests and reviews were performed throughout the various construction stages to evaluate the safety of the parking structure. The OIG found that the tests were executed by various firms costing a total of approximately \$27,000; however, all of the tests were designed by the architectural firm, the design and engineering firm that was designated by the patent owner, which by definition had a vested interest in the success of the modular parking structure. The results of the tests were mixed, with two passing and one failing; however, the Agency's D&E team did not agree with the design of the tests, claiming the contractor's criteria and testing methods were inadequate.

⁸ A Professional Engineer or PE is a licensed engineer who has completed a four-year college degree, worked under a PE for at least four years, passed two intensive competency exams, and earned a license from their state's licensure board. In addition, PEs are required by professional licensing standards to shoulder the responsibility for not only their work, but also for the lives affected by that work and must hold themselves to high ethical standards and practices.

To alleviate the D&E team's concerns with the tests and to support the Agency's concern for life and safety, the Agency requested three independent design and engineering entities, which included the USACE, to perform a safety review of the modular parking deck, at a total cost of approximately \$120,000. Per discussion with D&E, all three entities found similar life and safety issues; however, only two of the three architectural firms provided a written report. The third architectural firm review found "a lack of a proper foundation, a lack of continuity of posts, and a lack of installed grounding system and a lack of installed lightning protection system." In addition, one of the architectural firms that provided a report stated similar life safety issues and "strongly recommends the structure remain closed to personnel until it is verified as meeting all code requirements specified in the contract. . . . Failure to resolve the deficiencies and identified issues prior to occupancy could result in structural collapse and loss of life."

One architectural firm strongly recommended that "the structure remain closed to personnel until it is verified as meeting all code requirements specified in the contract ... Failure to resolve the deficiencies and identified issues prior to occupancy could result in structural collapse and loss of life"

These concerns were similar to what was identified by the Agency's D&E team during the initial contracting and design phase. All three firms deemed the parking structure unsafe.

The OIG believes that the concerns and disagreements raised during the contracting, design, and construction phases of this project could have been alleviated earlier if a proper risk assessment had been completed and if issues were addressed in a timely manner. However, the OIG could not verify any documented risk assessments, acceptance, or mitigation that occurred leading up to or during the project. The OIG met with multiple I&L senior leaders who agreed that they did not follow a formal risk acceptance process on the project and agreed that establishing such a process might have prevented some of these issues earlier in the project cycle. In addition, the Agency does not have a policy designating a Building Official, who, per UFC 1-200-01 Building Code section 2-1.4 paragraph 104.1, "is the person authorized and directed to enforce the provisions of this code, UFC or FC. They have the authority to render interpretations of this code UFC, FC and to clarify the application of the provisions." Furthermore, designating a team and Building Official within the Agency to oversee internal professional disagreements such as these may have prevented wasted costs, such as unplanned testing and independent reviews.

RECOMMENDATION AU-19-0013-7

Designate a Building Official, in accordance with UFC 1-200-1.

LEAD ACTION: Director, WSA

RECOMMENDATION AU-19-0013-8

Develop and implement a standard approval process for adjudicating and resolving concerns and disagreements on internal construction safety. The process should include a requirement for documenting the results.

LEAD ACTION: Director, WSA

Agency Pays for a Product It Cannot Use

The Agency paid the construction service contractor in full in September 2019, even though the contractor could not demonstrate it had met the UFCs, which were never officially removed from the contract terms. According to I&L leadership, it would have cost more in legal fees to withhold payment than the \$3 million owed on the contract. According to OGC, the Agency received the product it had contracted to receive. OGC told the OIG that it is common for the Agency to change requests or requirements throughout the contract, and they believe that is what happened in this case. According to I&L leadership, ultimately the decision to remove the structure was due to professional disagreements within the Agency.

The parking structure was demolished in Fall 2019 without ever being used. We found that the contract for demolition was awarded as an 8(a) contract to a different construction service provider on the same day in September 2019 that the final payments were made to the contractor who constructed the structure. The demolition contract was awarded for \$500,000.

Conclusion

The OIG found that the modular parking structure was hastily planned and poorly executed, and that the project suffered from the lack of a consistent process, including risk assessment, acceptance, and mitigation and dispute resolution. While I&L leadership told the OIG that the Agency was willing to accept some level of risk for the structure, the way in which this project was handled resulted in the Agency wasting \$3.6 million to construct and demolish a structure for which it received no benefit.

III. RECOMMENDATIONS

To BM&A

RECOMMENDATION AU-19-0013-4

Implement a process to ensure that when awarding a parking and transportation contract, documentation is maintained to support that the contractor selected has the expertise to fulfill the contract requirements.

Page: 20

Management Response:

Agree. For sole source 8(a) procurements that do not require a CICA, BM&A will update MPOAS to require the mission customer to assess the vendor's expertise as part of the technical evaluation.

Implementing Organization: Contracting Policy & Programs

OIG Analysis: The action planned meets the intent of the recommendation.

To WSA

RECOMMENDATION AU-19-0013-1

Update NSA/CSS Policy 9-5 to assign a specific organization the responsibility for developing parking and transportation plans and strategies that will identify the needs of the workforce and enhance the employee's parking experience, in accordance with I&L goals.

Page: 7

Management Response:

Agree. I&L will update Policy 9-5 to identify CTC as the single organization with overall responsibility of parking and transportation plans.

Implementing Organization: The Commuter Transportation Center

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-2

Upon completion of Recommendation AU-19-0013-1, conduct a study of parking at NSAW, Ft. Meade, including a workforce survey, and use the results to develop a comprehensive parking and transportation plan, and strategies to achieve it, that align with I&L goals.

Page: 10

Management Response:

Agree. I&L will design and conduct a workforce survey and take all recommendations under consideration.

Implementing Organization: Installations & Logistics

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-3

Update Policy 9-5 to designate a team comprised of the designated parking authority and other appropriate stakeholders to document and manage the process for originating and developing parking and transportation initiatives, including but not limited to ensuring:

1. Alignment with established parking and transportation goals and future initiatives,
2. Appropriate approvals and prioritization, and
3. Evaluation of risks, to include acceptance and mitigation efforts.

Page: 17

Management Response:

Agree; I&L will update Policy 9-5 to clarify any processes related to parking and transportation initiatives. To date, I&L has implemented a number of initiatives to include a parking guidance system to optimize the use of parking spaces UDrive-it which is NSA's version of Uber. I&L regularly benchmarks with partners in the DoD and Intelligence Community along with the private sector to identify new and creative solutions.

Implementing Organization: The Commuter Transportation Center

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-5

Establish a policy that requires the use of a wavier process for documenting when some or all UFCs are removed in parking and transportation projects.

Page: 21

Management Response:

Agree. I&L will establish or amend a policy to require the use of our Engineering Standards Board (ESB) process which already includes a waiver for documenting when some or all UFCs are removed.

Implementing Organization: Installations & Logistics

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-6

Document roles, responsibilities, and a process flow for ensuring sufficient oversight for construction projects managed internally without the assistance of DoD or outside entities, like the Army Corp of Engineers.

Page: 22

Management Response:

Agree. I&L will update SOPs to document roles, responsibilities, and a process flow for construction projects managed internally without assistance of DoD or outside entities.

Implementing Organization: Facilities Operations

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-7

Designate a Building Official, in accordance with UFC 1-200-1.

Page: 23

Management Response:

Agree. The Engineering Standards Board will be designated as the UFC 1-200-1, Building Official.

Implementing Organization: Facilities Operations

OIG Analysis: The action planned meets the intent of the recommendation.

RECOMMENDATION AU-19-0013-8

Develop and implement a standard approval process for adjudicating and resolving concerns and disagreements on internal construction safety. The process should include a requirement for documenting the results.

Page: 24

Management Response:

Agree. An electronic form will be created for submitting and documenting substantial building code concerns that the Engineering Standards Board (Building Official) will make a ruling on. The form will include a section that documents the decision.

Implementing Organization: Facilities Operations

OIG Analysis: The action planned meets the intent of the recommendation.

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APPENDICES

APPENDIX A: About the Audit

Objective

The overall objective of this audit was to assess the economy, efficiency, and effectiveness of selected parking and transportation initiatives at NSAW, Ft. Meade, and to determine if they were in compliance with applicable laws, regulations, policies, and best practices.

Scope and Methodology

Fieldwork for this audit was conducted from August 2019 through February 2020. The audit focused on parking and transportation initiatives over the previous five years.

We reviewed written processes, procedures, and other documentation for adequate controls. We conducted 35 interviews of personnel within Workforce Support Activities and Business Management & Acquisition who are responsible for or have specified roles in approving, planning, executing, and enforcing parking and transportation initiatives.

This audit of the Agency's parking and transportation initiatives was conducted by the Office of the Inspector General (OIG) using generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions according to our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions according to our audit objectives. We reviewed policies, procedures, and internal controls to determine whether the Agency's parking and transportation initiatives were being executed compliantly.

Use of Computer-Processed Data

We relied on computer-processed data to conduct this audit. We used computer-processed data received from SEARCHLIGHT, the Agency's personnel directory service; ARCHIBUS, the Agency's source system of record for location and project management tool; and Local Police 2, the Agency's source system of record used to support NSA Police processes. We determined that the computer-processed reports were reliable by confirming existence and comparing like data from multiple sources.

Previous Coverage

There has been no previous audit coverage by the OIG of the Agency's parking and transportation initiatives.

Criteria

National Policies and Procedures

41 Code of Federal Regulations, chapter 102, section 74.310, prescribes what measure federal agencies must take to improve the utilization of parking facilities.

House of Representatives Military Construction, Veterans Affairs and Related Agency Appropriation Bill, 2017 and 2018, provides appropriations to military construction for defense-wide agencies.

DoD Unified Facilities Criteria system provides planning, design, construction, sustainment, restoration and modernization criteria, and applies to the Military Department, the Defense Agencies, and DoD field activities. Applicable to this audit are *DoD Building Code 1-200-01*, 8 October 2019; *Civil Engineering 3-201-01*, 1 July 2019; and *Low Impact Development 3-210-10*, 1 February 2016.

Architectural Barriers Act Accessible Standards for Federal facilities, *Accessibility Standard for Department of Defense Facilities*, 1 June 2009, sets standards to DoD facilities under Architectural Barriers Act (ABA).

Military Surface Deployment and Distribution Command Transportation Engineering Agency, Safety Bulletin 12-02 *Parking Lots and Garages*, April 2012, establishes best practices for military parking and garage usage.

DoD Instruction 4165.70, *Real Property Management*, 6 April 2005, implements policy and assigns responsibility, for managing real property.

U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government* (Green Book), 10 September 2014, sets the standards for effective internal control system for federal agencies.

Federal Acquisition Regulations, 2019, the primary regulation for use by all executive agencies in the acquisition of supplies and services with appropriated funds.

NSA Policy

NSA/CSS Policy 9-5, *Traffic and Parking*, 26 September 2014, establishes the control of vehicular traffic and parking at properties controlled by NSA/CSS across the Global Cryptologic Enterprise.

NSA/CSS Policy 9-19, *Management, Acquisition, and Use of Motor Vehicles*, 28 July 2014, implements Department of Defense (DoD) Manual 4500.36 and establishes policy, assigns responsibilities, and prescribes procedures for the acquisition and use of NSA/CSS-owned and -leased motor vehicles.

Directorate of Operations Policy

National Security Agency Police Special Directive 0600-02, *Parking Enforcement*, 18 March 2014, establishes NSA Police guidance for conducting parking enforcement.

Standards for Internal Control

Internal Controls

As part of the audit, we assessed the organization's control environment pertaining to the audit objectives, as set forth in NSA/CSS Policy 7-3, *Managers' Internal Control Program*, 13 September 2019. We reviewed Workforce Support Activities (WSA) and Business Management & Acquisition Statements of Assurance, and the Vulnerability and Process Assessments for HR Strategy and Program Design, HR Customer Service Center, and Payroll Entitlements. Collectively, they did not contain any material weakness applicable to this audit; however, they identified unintentional errors and overpayment as a risk in these programs.

We reviewed internal controls that related to the five Agency Parking and Transportation Initiatives. Our review was limited to controls applicable to our audit objective as it relates to:

1. Control environment,
2. Risk assessment,
3. Control activities,
4. Information and communication, and
5. Monitoring.

In addition, we reviewed the management and monitoring of parking lots. We identified findings that highlight a lack of centralized strategic parking planning, poor initiative implementation, and ineffective monitoring of the parking program.

APPENDIX B: Abbreviations and Organizations

BM&A	Business Management & Acquisition
COTS	Commercial off-the-shelf
CTC	Commuter and Transportation Center
D&E	Design and Engineering
DoD	Department of Defense
DoDI	Department of Defense Instruction
FAR	Federal Acquisition Regulation
FC	Facilities Criteria
GPS	Global Positioning System
I&L	Installations & Logistics
NSA/CSS	National Security Agency/Central Security Service
NSAW	NSA Washington
OGC	Office of General Counsel
OIG	Office of the Inspector General
PM	Project Manager
SDDCTEA	Surface Deployment and Distribution Command Transportation Engineering Agency
SOP	Standard operating procedure
SOW	Statement of work
UFC	United Facilities Criteria
USACE	U.S. Army Corps of Engineers
VCP	Vehicle Control Point
WSA	Workforce Support Activities



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OFFICE OF THE INSPECTOR GENERAL



Pursuant to the Inspector General Act of 1978, as amended, and in accordance with NSA/CSS Policy 1-60, the NSA/CSS Office of the Inspector General (OIG) conducts independent oversight that promotes Agency respect for Constitutional rights, adherence to laws, rules, and regulations, and the wise use of public resources. Through investigations and reviews, we detect and deter waste, fraud, abuse, and misconduct and promote the economy, the efficiency, and the effectiveness of Agency operations.

