

# Naval Audit Service



## Audit Report



# Internal Controls Over the Marine Corps Civilian Law Enforcement Program

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N2016-0017  
6 January 2016

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2015-045  
6 Jan 16

**MEMORANDUM FOR COMMANDANT OF THE MARINE CORPS**

**Subj: INTERNAL CONTROLS OVER THE MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM (AUDIT REPORT N2016-0017)**

**Ref:** (a) NAVAUDSVC memo 7510/2015-045, dated 23 Jan 15  
(b) SECNAV Instruction 7510.7F, "Department of the Navy Internal Audit"

**Encl:** 1. Status of Recommendations  
2. Pertinent Guidance  
3. Scope and Methodology  
4. Management Response from Commandant of the Marine Corps

1. **Introduction.** The report provides results of the subject audit announced in reference (a). The audit found that there were effective internal controls provided over the administration and oversight of the Marine Corps Civilian Law Enforcement Program (MCCLEP). However, the audit found opportunities to improve the Marine Corps Managers' Internal Control program. Paragraph 6 provides the audit results. Headquarters United States Marine Corps responded to Recommendations 1 through 7. See Enclosure 1 for Status of the Recommendations. The full text of the Management Responses is in Enclosure 4.

2. **Reason for Audit.** This audit was requested by the Acting Inspector General of the United States Marine Corps (IGMC). The audit objective was to verify the internal controls over the administration and oversight of the law enforcement training program for the contract number N00178-06-D-4759-V702.

3. **Background.**

a. On 25 March 2014, an inquiry request was sent to the Acting IGMC regarding the MCCLEP support contract (contract number N00178-06-D-4759-V702) due to possible instances of questionable business practices since MCCLEP was implemented. The Acting IGMC requested Naval Audit Service to perform an audit on the MCCLEP support contract and its service provider, Homeland Security Solutions Incorporated (HSSI), on 17 July 2014.

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b. After 11 September 2001, Congress opened security positions to contractors to fill the void when military police officers were deployed. Civilians were relied on, thus creating the Marine Corps Civilian Law Enforcement Program. In 2008, the Marine Corps began researching civilian law enforcement training options based on what other military branches were doing because there were still no Department of Defense (DoD)-wide training standards published for civilians. After researching, the Marine Corps decided to open two training academies (an east and west school), develop their own training curriculum, and contract out training instructors through HSSI. HSSI provides additional support at installations by assisting both active duty and civilian Marine Corps personnel with badging, credentials, administrative duties, etc.

c. Initially, the audit team discussed approaching the audit effort as a full-scope audit limited to a single contract review. However, while reviewing the contract, the audit team found that the MCCLEP support contract encompasses more than MCCLEP. Therefore, since the initial audit request was based on a concern involving the training services provided and a separation between Government and contractor during the training approval process, the audit team refocused their audit objective on the internal controls over the law enforcement training curriculum and approval process within the contract.

**4. Briefings with Management.** Throughout this effort, we conducted status briefings of our audit efforts with the Acting IGMCM; Headquarters Marine Corps (HQMC) for the Programs and Resources (P&R) Risk and Compliance (RFK) division, Managers' Internal Control (MIC) program coordinators; the U.S. Marine Corps Plans, Policies, and Operations (PP&O) MIC program coordinator; and management from the U.S. Marine Corps, PP&O, Law Enforcement and Corrections (PSL). We held our entrance conference with the Branch Head and Deputy Branch Head of PP&O, PSL, on 5 February 2015. On 27 April 2015, we met with HQMC, P&R RFK MIC program coordinators and the PP&O's MIC program coordinator and discussed potential MIC related audit results. Additionally, we conducted a teleconference with the Branch Head of PP&O, PSL on 1 June 2015 to provide an updated status on the audit and the preliminary audit results.

**5. Federal Managers' Financial Integrity Act.** The Federal Managers' Financial Integrity Act (FMFIA) of 1982, as codified in Title 31, United States Code, requires each Federal agency head to annually certify the effectiveness of the agency's internal and accounting system controls. In our opinion, the lack of adherence to guidance by the HQMC, P&R - RFK and HQMC, PP&O MIC program coordinators noted in this report, may warrant reporting in the Auditor General's annual FMFIA memorandum identifying management control weaknesses to the Secretary of the Navy in the event that other audit reports identify the same or similar conditions.

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**6. Audit Results.**

a. **Summary of Results.** We conducted this audit to determine whether there were effective internal controls over the administration and oversight of MCCLEP for the contract number N00178-06-D-4759-V702, dated 28 August 2014, and applicable through 12 September 2015. Specifically, we analyzed: (1) the Marine Corps Basic Police Officer Course Program of Instruction (POI) to determine whether it was in accordance with DoD Instruction 5525.15, "Police Minimum Training Tasks;" Marine Corps training approval process used within the PP&O, Law Enforcement and Corrections (PSL) division to analyze oversight over the development of the civilian law enforcement training curriculum; and the MIC program within the Marine Corps PP&O PSL division to determine whether there was effective management of the internal controls. We found that there were effective internal controls provided over the administration and oversight of MCCLEP. Specifically, we found that overall the classes taught throughout the Marine Corps Basic Police Officer Training POI were in accordance with DoD Instruction 5525.15, "Police Minimum Training Tasks," and that MCCLEP has an approval process in place that oversees the development of the civilian law enforcement training curriculum. However, we determined that opportunities existed to improve the MIC program, as the Marine Corps Headquarters P&R and PP&O MIC coordinator were not operating in accordance with guidance.

b. **Training Comparison Analysis.** We performed a training comparison analysis to determine if the Marine Corps Basic Police Officer Training Course POI was in compliance with DoD Instruction 5525.15. We found that overall the classes taught throughout the Marine Corps Basic Police Officer Training POI were in accordance with the instruction. Specifically, our analysis identified that out of 114 DoD minimum training task requirements, 111 requirements were being met. From the three remaining requirements, we were unable to determine if two DoD minimum training task requirements were being taught due to the POI learning objectives terminology being different than the DoD requirement. We determined the other remaining requirement was not applicable because the requirement did not apply to all Marine Corps law enforcement personnel.

(1) We interviewed Deputy Branch Head of PP&O, PSL and his staff, and obtained and analyzed the Marine Corps Basic Police Officer Training Course POI dated March 2012 and 2013. We reviewed 79 classes in the Marine Corps Basic Police Officer Training Course POI and identified 289 corresponding enabling learning objectives, which are described as key learning topics discussed in each class. We determined that out of the 289 enabling learning objectives, 235 were equivalent to 111<sup>1</sup> DoD minimum training task requirements, as stated in DoD Instruction 5525.15. In addition, we also determined that out of 114 DoD minimum training task requirements, 3 DoD minimum

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<sup>1</sup> Some Marine Corps courses covered multiple training objectives; therefore, for some Marine Corps courses, each course linked back to multiple DoD requirements.

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training tasks were not equivalent to any of the 289 enabling learning objectives. Specifically, we could not fully determine if the following requirements were met:

*(a) Prepare Evidence Voucher:* The Deputy Branch Head of PP&O, PSL and staff stated that they assume that an “evidence voucher” is what they refer to as an “evidence custody document.” In addition, the DoD Director of Law Enforcement Policy and Support also stated that these two documents are probably the same. However, we could not accurately determine whether these two documents were the same; therefore, we were unable to determine if the DoD minimum training task, “Prepare Evidence Voucher,” is being taught throughout the Marine Corps Basic Police Officer Course POI.

*(b) 1st Responder Treatment of Gunshot Wounds:* The Deputy Branch Head of PP&O PSL and staff stated that first aid steps when dealing with gunshot wounds are addressed in the National Safety Council (NSC) instructor and student manuals. Additionally, the DoD Director of Law Enforcement Policy and Support stated that wound protection is meant to be taught in the first-level medical training class; however, when the training policy was created, policy writers wanted to highlight treatment of gunshot wounds by making it a separate training requirement. When we analyzed the Marine Corps Basic Police Officer Course Instructor’s Guide, we determined that “1st responder treatment of gunshot wounds” was not directly stated. However, the Marine Corps Basic Police Officer Course, Instructor’s Guide did provide a role-playing scenario of bleeding/wound care. Additionally, care for injuries, medical emergencies, and bleeding control is covered in the NSC advanced first aid course. Even though we were able to locate these references, we were unable to fully determine if the DoD minimum training task, “1st Responder Treatment of Gunshot Wounds,” is being taught throughout the Marine Corps Basic Police Officer Course POI.

(2) Our review also identified one DoD minimum training task requirement that was not applicable to the Marine Corps Basic Police Officer Training Course. For “Qualify with Assigned Weapon: Long Gun/Sniper Rifle,” the Deputy Branch Head of PP&O PSL stated that only designated marksmen receive Long Gun/Sniper Rifle training. In addition, DoD Director of Law Enforcement Policy and Support stated that if a law enforcement agency does not use long guns/sniper rifles, then the DoD Instruction training requirement becomes not applicable. We reviewed the Marine Corps Basic Police Officer Course Instructor’s Guide, and were unable to find Long Gun/Sniper Rifle training. However, the Deputy Branch Head of PP&O PSL provided the Special Reaction Team (SRT) Course Instructor’s Guide for advanced training, in which sniper rifle training is included. Therefore, we determined that Long Gun/Sniper Rifle training is an advanced training course, and as a result, it is not applicable and therefore not included within the Marine Corps Basic Police Officer Course POI.

**c. Training Approval Process Analysis.** We performed an analysis on the MCCLEP approval process. We determined that MCCLEP has an approval process in

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place that directly controls and oversees the development of the civilian law enforcement training curriculum. Specifically, we obtained information during interviews with the current Deputy Branch Head of PP&O, PSL, and we obtained and reviewed Federal Law Enforcement Training Accreditation (FLETA) accreditation documentation and the Marine Corps Police Academy (MCPA) Policy and Procedures Manual to determine the MCCLEP training approval process. We determined the following areas that showed PP&O, PSL has an approval process in place. Based on our analysis of the MCPA Policy and Procedures Manual:

(1) We determined that MCCLEP contains the four required duty positions: the Deputy Branch Head of PP&O PSL is the Head of Training, Education and Equipment, and both the east and west coast academies have separate Executive Directors and Directors of Training. Training instructors were contracted through HSSI. The current Deputy Branch Head of PP&O, PSL, former Branch Head of PP&O, PSL, and the Executive Directors at the east and west coast academies were the only personnel involved in creating the curriculum for the MCCLEP course.

(2) We found that PP&O, PSL personnel periodically physically monitor all instructors in order to ensure that students are being taught the courses that are stated in the MCCLEP POI. The POI consists of lesson plans, course descriptions, learning objectives, and practical handouts that were developed for the instructor's use.

(3) We determined that the Marine Corps developed an 8-week POI that was reviewed by the Course Content Review Board (CCRB)<sup>2</sup> after each 8-week course to discuss course effectiveness. Once a training course need is identified and approval is received by the Provost Marshal Officer, CCRB convenes and approves training courses. The course documents are then submitted to the current Deputy Branch Head of PP&O, PSL for approval. After the course is delivered, CCRB then internally assesses the effectiveness of the course by collecting feedback from the academies and instructors, and by surveying the students. We obtained several CCRB Records of Proceedings (ROPs), which show discussions regarding the MCPA basic course curriculum, as well as the agreed upon recommendations to modify the specific areas discussed. We also received a CCRB memorandum that shows previously discussed MCCLEP training issues that were reviewed and approved.

(4) We found that PP&O, PSL also uses the Marine Corps Civilian Law Enforcement Accreditation Program when evaluating police departments in order to develop a plan specifically designed to improve a department's performance.

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<sup>2</sup> The CCRB consists of seven members; three Government individuals and four HSSI individuals. The three Government board members vote on the course recommendations that get carried forward into implementation.

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d. **Managers' Internal Control (MIC) Program.** We obtained and reviewed Fiscal Years (FYs) 2014 and 2015 MIC program Certification Statements, and the FY 2014 Statement of Assurance (SOA) to determine whether the MIC program was being conducted in accordance with the Secretary of the Navy (SECNAV) Instructions M-5200.35 and 5200.35F. We determined that HQMC, P&R – RFK's and PP&O's MIC program coordinators did not ensure that the MIC program was conducted in accordance with guidance.

(1) HQMC P&R – RFK's MIC program coordinator did not ensure: a MIC plan was created and implemented for FYs 2014 and 2015; assessable units for each major assessable unit (AU) were appropriately established as defined in the SECNAV guidance; and Assessable Unit Managers (AUMs) were appointed at the sub-activity level. We determined this occurred because the HQMC P&R- RFK MIC program coordinator did not provide sufficient oversight. As a result, without proper oversight and policy, HQMC P&R – RFK may be at risk for fraud, waste, abuse and mismanagement of Government funds. In addition, HQMC for P&R – RFK cannot provide reasonable assurance that commands within their branch, function under a system of internal controls that comply with all laws and regulations.

(2) PP&O's MIC program coordinator did not maintain documentation to support the performance of risk and internal control assessments for PP&O's MIC program, identify or train AUMs, or submit complete MIC Certification Statements in accordance with SECNAV guidance. We determined this occurred because PP&O's MIC program coordinator did not provide sufficient oversight. As a result, the PP&O MIC program coordinator does not have reasonable assurance that internal controls over PP&O's MIC program were sufficient to prevent or detect fraud, waste, and abuse. In addition, due to the FYs 2014 and 2015 MIC Certification Statements not being appropriately reported, PP&O could not appropriately provide an unqualified statement of reasonable assurance that PP&O's system of internal controls met the objectives of the FMFIA program's administrative and operational activities.

7. **Recommendations.** Our recommendations, summarized management responses, and our comments on the responses follow. The complete text of management responses from the Commandant of the Marine Corps is in Enclosure 4. We recommend that the Commandant of the Marine Corps direct the Headquarters Marine Corps, Program and Resources – Risk and Compliance Branch, Managers' Internal Control program coordinator to:

**Recommendation 1.** Create and implement a Managers' Internal Control plan that includes each of the seven mandatory key elements stated in Secretary of the Navy Instruction M-5200.35.

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**Management response to Recommendation 1.** Concur. The HQMC [Headquarters, Marine Corps] MICP [Management Internal Control program] Coordinator will request that each assessable unit complete and submit an annual MIC plan detailing the area(s) to be assessed and timelines of assessments. The HQMC MICP Coordinator will review and maintain a copy of each assessable unit's plan upon completion and submission. Estimated completion date: MIC Plan Development – 31 December 2015; Implementation of MIC Plan – 31 March 2016.

**Naval Audit Service comment on the management response to Recommendation 1.** Actions planned meet the intent of Recommendation 1. This recommendation is considered open pending receipt of documentation of planned actions.

**Recommendation 2.** Establish sub-assessable units for each major assessable unit to ensure that the Managers' Internal Control process is structured in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.

**Management response to Recommendation 2.** Partially Concur. The HQMC MICP Coordinator and Alternate will communicate to each major assessable unit manager the requirement to establish sub-assessable units if they determine that sub-assessable units increase the ability to detect weaknesses impacting the organization's mission or the major assessable unit manager oversees an organization so large as to prevent its manager from performing a meaningful evaluation of the internal controls without expending an extensive amount of effort or resources. Estimated completion date of corrective actions in response to Recommendation 2 is 29 February 2016.

**Naval Audit Service comment on the management response to Recommendation 2.** Actions planned meet the intent of Recommendation 2 provided that the outcomes comply with the required actions specified in the Secretary of the Navy Instructions M-5200.35 and 5200.35F.

If the Major Assessable Unit determines that designating sub-assessable units are not pertinent to detect internal control weaknesses, documentation supporting that the following actions have been taken are required to close this recommendation:

- a. Appoint an Assessable Unit Manager at the Major Assessable Unit level;
- b. Confirm the Assessable Unit Manager has completed the Department of the Navy Managers' Internal Control Training for Managers to ensure that they are knowledgeable of their responsibilities;

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- c. Ensure the Plans, Policy, and Operations Managers' Internal Control Program Coordinator provides guidance (via e-mail or memorandum) as needed to the Assessable Unit Manager outlining all responsibilities as stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F. This guidance should include the documentation requirements that the Assessable Unit Manager should maintain to support results of risk assessments and internal control reviews;
- d. Assessable Unit Manager performs risk assessments and maintains results of internal control reviews conducted for Plans, Policy, and Operations functions to ensure evaluation of the entire organization;
- e. Assessable Unit Manager submits documentation to support actions conducted in item (d) to the Major Assessable Unit Managers' Internal Control Program Coordinator; and
- f. Major Assessable Unit Managers' Internal Control Program Coordinator compiles the submissions of the Assessable Unit Manager and submits the Managers' Internal Control Program Certification Statement to higher headquarters. The Statement should also include the five mandatory elements stated in Secretary of the Navy Instructions M-5200.35.

If the Major Assessable Unit determines that designating sub-assessable units is necessary to detect internal control weaknesses, documentation supporting that the following actions have been taken are required to close this recommendation:

- a. Identify appropriate assessable units at the sub-activity level and include in the Plans, Policy, and Operations inventory of assessable units;
- b. Appoint an Assessable Unit Manager for each sub-assessable unit;
- c. Confirm each Assessable Unit Manager has completed the Department of the Navy Managers' Internal Control Program Training for Managers to ensure that they are knowledgeable of their responsibilities;
- d. Ensure the Plans, Policy, and Operations Managers' Internal Control Program Coordinator provides guidance (via e-mail or memorandum) as needed to each Assessable Unit Manager outlining all responsibilities as stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F. This guidance should include the documentation requirements that the Assessable Unit Managers should maintain to support results of risk assessments and internal control reviews;

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- e. Each Assessable Unit Manager is performing risk assessments and maintaining results of internal control reviews conducted to ensure the evaluation of the sub-assessable unit;
- f. Each Assessable Unit Manager submits documentation to support actions conducted in item (e) to the Major Assessable Unit Managers' Internal Control Program Coordinator; and
- g. Major Assessable Unit Managers' Internal Control Program Coordinator compiles the submissions of the Assessable Unit Managers and submits the Managers' Internal Control Program Certification Statement to higher headquarters.

The Statement should also include the five mandatory elements stated in Secretary of the Navy Instruction M-5200.35.

This recommendation is considered open pending receipt of documentation of planned actions.

**Recommendation 3.** Appoint Assessable Unit Managers at the sub-activity level.

**Management response to Recommendation 3.** The USMC partially concurs with the recommendation. The HQMC MICP Coordinator and Alternate will communicate to each major assessable unit manager the requirement to appoint sub-assessable managers if they determine that sub-assessable managers increase the ability to detect weaknesses impacting the organization's mission or the major assessable unit manager oversees an organization so large as to prevent its manager from performing a meaningful evaluation of the internal controls without expending an extensive amount of effort or resources. The estimated completion date of corrective actions in response to Recommendation 3 is 31 December 2015.

**Naval Audit Service comment on the management response to Recommendation 3.** Actions planned could meet the intent of Recommendation 3 pending the actions taken in Recommendation 2. This recommendation is considered open pending receipt of documentation of planned actions.

**Recommendation 4.** Establish internal controls to ensure oversight of the Managers' Internal Control program in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.

**Management response to Recommendation 4.** Partially Concur. We will continue to discuss organizational requirements with Marine Corps senior leaders to ensure we meet the key provisions of the Secretary of the Navy guidance and

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ensure that proper governance exists within the Marine Corps to oversee the critical tenets of the Manager's Internal Control program.

In an effort to increase its oversight of the MICP throughout the Marine Corps, the MICP Coordinator will:

- Strengthen communication efforts with all USMC command elements at the major assessable unit level and establish communication efforts at the sub-assessable unit level immediately following establishment;
- Coordinate with the Office of the Inspector General of the Marine Corps to review weaknesses/conditions reported via the annual Risk and Opportunity Assessment (ROA); and
- Assess organizational requirements to coordinate or conduct on-site assessments or validation testing to provide reasonable assurance that corrective actions are in place and assessable/sub-assessable unit managers sustain oversight of internal controls within their organizations.

The estimated completion date of corrective actions in response to Recommendation 4 is 31 May 2016.

**Naval Audit Service comment on the management response to Recommendation 4.** Actions planned meet the intent of Recommendation 4. This recommendation is considered open pending documentation of planned actions.

We recommend that the Commandant of the Marine Corps direct the Headquarters Marine Corps Plans, Policies, and Operations' Managers' Internal Control program coordinator to:

**Recommendation 5.** Provide Department of the Navy Managers' Internal Control Training for Managers to ensure that the Assessable Unit Managers are performing their responsibilities and maintaining the appropriate documentation as stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F.

**Management response to Recommendation 5.** Concur. Law Enforcement and Corrections Branch (PSL) will coordinate with PP&O [Plans, Policy, and Operations] MIC Coordinator and P&R [Programs and Resources] for MIC process training. PSL will conduct risk assessment to MCCLEP [Marine Corps Civilian Law Enforcement Program] as outlined in ref (b) and develop appropriate controls. The expected completion date is 31 December 2015.

**Naval Audit Service comment on Management Response to Recommendation 5.** Actions planned could meet the intent of

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Recommendation 5, pending the actions taken in Recommendation 2. This recommendation is considered open pending receipt of documentation of planned actions.

**Recommendation 6.** Establish internal controls to ensure that the Managers' Internal Control Certification Statements for Plans, Policies, and Operations and each sub-activity includes each of the five mandatory elements stated in Secretary of the Navy Instruction M-5200.35.

**Management response to Recommendation 6.** Concur. PSL, as a sub-activity under PP&O, will provide inputs to the PP&O statement of assurance to be incorporated into the PP&O MIC certification statements. Estimated completion date is the next reporting period as outlined in ref (b).

**Naval Audit Service comment on Management Response to Recommendation 6.** Actions planned could meet the intent of Recommendation 6, pending the actions taken in Recommendation 2. This recommendation is considered open pending receipt of documentation of planned actions.

**Recommendation 7.** Establish internal controls to maintain the internal control and risk assessments performed by the sub-activities for all of Plans, Policies, and Operations' reporting categories and functional areas reviewed.

**Management response to Recommendation 7.** Concur. As a sub-activity under PP&O MIC program, PSL will provide the necessary risk assessments performed for MCCLEP to PP&O MIC Coordinator. Estimated date of completion for risk assessment is 31 December 2015.

**Naval Audit Service comment on Management Response to Recommendation 7.** Actions planned could meet the intent of Recommendation 7, pending the actions taken in Recommendation 2. This recommendation is considered open pending receipt of documentation of planned actions.

**8. Other Information.**

a. Action planned by Headquarters Marine Corps Plans, Policies, and Operations' Managers' Internal Control program meet the intent of Recommendations 1 and 4. These recommendations are considered open pending completion of the planned corrective actions, and are subject to monitoring in accordance with reference (b). Management should provide a written status report on the recommendations within 30 days after target completion dates. The Headquarters Marine Corps Plans, Policies, and Operations'

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Managers' Internal Control program will meet the intent of Recommendation 2, if documentation supporting that the actions stated have been taken. These recommendations are considered open pending completion of the planned corrective actions, and are subject to monitoring in accordance with reference (b). Management should provide a written status report on the recommendation within 30 days after target completion dates. The Headquarters Marine Corps Plans, Policies, and Operations' Managers' Internal Control program could meet the intent of Recommendations 3 and 5-7, pending the actions taken in Recommendation 2.

b. Please provide all correspondence to the Principal Director, Internal Control and Investigative Support Audits, [REDACTED], by e-mail at [REDACTED], with a copy to the Director, Policy and Oversight, [REDACTED] and the Naval Audit Service Followup Coordinator, [REDACTED]. Please submit [REDACTED] correspondence in electronic format (Microsoft Word or Adobe Acrobat file), and ensure that it is on letterhead and includes a scanned signature. FOIA (b)(6)

c. Any requests for this report under the Freedom of Information Act must be approved by the Auditor General of the Navy as required by reference (b). This report is also subject to followup in accordance with reference (b).

d. In order to protect privacy and other sensitive information included in this report, we request that you do not release this report outside the Department of the Navy, post on non-Naval Audit Service Web sites, or in Navy Taskers without the prior approval of the Auditor General of the Navy.

e. We appreciate the cooperation and courtesies extended to our auditors.

[REDACTED]

[REDACTED]

Principal Director, Internal Control and  
Investigative Support Audits

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Enclosure 1:

# Status of Recommendations

Recommendations							
Finding <sup>3</sup>	Rec. No.	Page No.	Subject	Status <sup>4</sup>	Action Command	Target or Actual Completion Date	Interim Target Completion Date <sup>5</sup>
1	1	6	Create and implement a Managers' Internal Control plan that includes each of the seven mandatory key elements stated in Secretary of the Navy Instruction M-5200.35.	O	Commandant of the Marine Corps	3/31/2016	
1	2	7	Establish sub-assessable units for each major assessable unit to ensure that the Managers' Internal Control process is structured in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.	O	Commandant of the Marine Corps	2/29/2016	
1	3	9	Appoint Assessable Unit Managers at the sub-activity level.	O	Commandant of the Marine Corps	2/29/2016	
1	4	9	Establish internal controls to ensure oversight of the Managers' Internal Control program in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.	O	Commandant of the Marine Corps	5/31/2016	
1	5	10	Provide Department of the Navy Managers' Internal Control Training for Managers to ensure that the Assessable Unit Managers are performing their responsibilities and maintaining the appropriate documentation as stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F.	O	Commandant of the Marine Corps	2/29/2016	

<sup>3</sup> / + = Indicates repeat finding.

<sup>4</sup> / O = Recommendation is open with agreed-to corrective actions; C = Recommendation is closed with all action completed; U = Recommendation is undecided with resolution efforts in progress.

<sup>5</sup> If applicable.

Recommendations							
Finding <sup>3</sup>	Rec. No.	Page No.	Subject	Status <sup>4</sup>	Action Command	Target or Actual Completion Date	Interim Target Completion Date <sup>5</sup>
1	6	11	Establish internal controls to ensure that the Managers' Internal Control Certification Statements for Plans, Policies, and Operations and each sub-activity includes each of the five mandatory elements stated in Secretary of the Navy Instruction M-5200.35.	O	Commandant of the Marine Corps	2/29/2016	
1	7	11	Establish internal controls to maintain the internal control and risk assessments performed by the sub-activities for all of Plans, Policies, and Operations' reporting categories and functional areas reviewed.	O	Commandant of the Marine Corps	2/29/2016	

## Pertinent Guidance

### *Training Comparison*

**Department of Defense (DoD) Instruction 5525.15, “Law Enforcement Standards and Training in the DoD, Police Minimum Training Tasks,” dated 27 April 2012.**

This instruction establishes DoD law enforcement standards and training. There are 114 police minimum training task requirements that fall under the following 13 activities/duties: General; Legal; Search; First Aid; Apply Force; Weapon(s); Communications; Patrol/Post Activities; Patrol/Post Incidents; Traffic Management; Reports/Report Writing; Civil Disturbance; and Chemical, Biological, Radiological, Nuclear, and Explosives.

### *Training Approval Process*

**Marine Corps Police Academy (MCPA) Policy and Procedures Manual, dated April 2012.** The manual establishes training and support to Marine Corps law enforcement professionals. In addition, the manual provides the following operation processes:

- Introduction: MCPA is a United States Marine Corps certified law enforcement training academy. It is operated under the supervision and leadership of the Director, Security Division, Headquarters Marine Corps (HQMC).
- Administrative instructions:
  - Purpose: MCPA provides basic and advanced training for Marine Corps law enforcement. This Policy and Procedures Manual establishes guidelines and procedures regarding the administration and conduct of MCPA. This manual also establishes MCPA policy and guidance for MCPA instructors in the performance of their duties and procedures for conducting training and maintaining quality standards for students undergoing training at an MCPA.
  - Scope: This manual is applicable to MCPA personnel assigned to duties with the MCPA program. The Executive Director, Director of Training, instructors, and support staffs assigned to the MCPA program are responsible for ensuring the policies and procedures set forth in this manual are implemented and adhered to.
- Organization: MCPA was designed to develop and deliver effective and efficient training programs. MCPA is managed by the Head of Training, Education, and Equipment for Supporting Establishment Law Enforcement Program. Assisting

the Head of Training, Education, and Equipment is the Executive Director. The Executive Director reports directly to the Head of Training, Education, and Equipment and has complete oversight of the academy. Instructional teams staffed by highly qualified trainers are assigned to MCPA. The team is supervised by a Director of Training. The Director of Training is in direct support of the Executive Director and works on his or her behalf supervising the academy's training programs.

- **Chain of Command:** Staff members that are assigned to MCPA operate under the cognizance of the Academy's Executive Director. The Director of Training is responsible to the Executive Director for the training programs at each MCPA. The Executive Director is responsible to the Head of Training, Education, and Equipment for MCPA. The Head of Training, Education, and Equipment has overall authority over MCPA.
- **Course Content Review Board:** A Course Content Review Board (CCRB) will be conducted on the basic course, at a minimum, annually. A comprehensive analysis and review of the training program, standard operating procedures, and course of instruction will be conducted by CCRB. In addition, new and proposed courses, new Marine Corps and law enforcement policies, procedures, guidance, and major decisions impacting the MCPA program will be coordinated during the CCRB review. The record of proceedings for CCRB will be archived by the Supporting Establishment Law Enforcement Program, the Director, Security Division, Plans, Policy, and Operations, and HQMC. Curriculum development documents will be retained for a period of 5 years.
- **Course Validation:** Course validation will be documented using both student and observer evaluation checklists. Upon completion of the validation, MCPA will submit a summary of results to the Head of Training, Education, and Equipment.
- **Quality Assurance Program/Performance Evaluation:** This program is intended to ensure each MCPA is conducted in a standardized and consistent manner; and to provide documented evidence necessary to ensure quality and excellence in accordance with HQMC's requirements. A semi-annual instructor evaluation will be conducted by the Director of Training and the Executive Director on all instructors. The Executive Director will submit a Staff Performance Evaluation on all MCPA staff members. This evaluation will be conducted annually and will be completed and forwarded to the Head of Training, Education, and Equipment by 30 June. All written evaluations will be conducted using an appropriate evaluation form. All evaluations will be kept on file and a duplicate copy will be submitted to HQMC for archiving.

### *Managers' Internal Control Program*

**Secretary of the Navy (SECNAV) Instruction M-5200.35, "Department of the Navy Managers' Internal Control (MIC) Manual," dated June 2008.** This manual specifies procedures for implementing an effective internal control program throughout the Department of the Navy (DON), and serves as management's basis for the Department's annual Statement of Assurance to the Secretary of Defense. This manual is applicable to the Offices of the Secretary of the Navy, the Chief of Naval Operations, the Commandant of the Marine Corps, and all Navy and Marine Corps activities, installations, commands, ships and stations; and includes the following:

- Every assessable unit (both major and sub-assessable units) should conduct at least one internal control assessment annually. Sub-assessable units are any assessable units that immediately report to a major assessable unit for MIC purposes. The Coordinator of the Major Assessable Unit (MAU) is required to report each year in their MIC Certification Statement the number of completed internal control assessments for the previous MIC year, the results of those assessments and the number of planned internal control assessments for the upcoming MIC year.
- Assessable units can either be Organizational or Functional. The Organizational units reflect the subunits found on each command's organization chart (e.g., a department, branch, or division); DON's Organizational assessable units are the MAUs. Management shall maintain an updated listing of the assessable units, along with their purpose and objectives, and use the list when planning any review of the system of internal controls. At a minimum, the inventory of assessable units shall include the name of the assessable unit and the responsible manager identified either by name or billet title.
- The submission for the MIC Certification Statement process shall include:
  - A cover memorandum;
  - Tab A: Accomplishments;
  - Tab B-1: Listing of Material Weaknesses, Reportable Conditions and Items-to-be-Revisited; Uncorrected and Corrected;
  - Tab B-2: Uncorrected Material Weaknesses, Reportable Conditions and Items-to-be-Revisited; and
  - Tab B-3: Corrected Material Weaknesses, Reportable Conditions and Items-to-be-Revisited.
- MIC Certification Statement Tab A: Accomplishments, should include a brief summary of the most significant, internal-control related accomplishments and actions taken by the command.

- MIC Certification Statement Tab B-1: Listing of Material Weaknesses, Reportable Conditions and Items-to-be-Revisited; Uncorrected and Corrected, should serve as a table of contents and clear listing of the titles of all uncorrected and corrected Material Weaknesses, Reportable Conditions, and Items-to-be-Revisited.
- MIC Certification Statement Tab B-2: Uncorrected Material Weaknesses, Reportable Conditions and Items-to-be-Revisited, should contain detailed narrative descriptions of all uncorrected Material Weaknesses, Reportable Conditions, and Items-to-be-Revisited, including the plans and schedules for the corrective action(s). Include those identified during the current year and those disclosed in prior years with updated information. Additionally, it shall be formatted the same way the provided example is formatted in the guidance and should include the following data elements: Title and Description of Issue, Functional Category, Weakness Type, Justification, Command, Senior Accountability Official, Year Identified, Original Targeted Correction Date, Targeted Correction Date in Last Year's Report, Current Target Date, Reason For Change in Date, Validation Indicator, Results Indicator, Source(s) Identifying Weakness, Major Milestones to Include Progress to Date, and the Point of Contact.
- MIC Certification Statement Tab B-3: Corrected Material Weaknesses, Reportable Conditions and Items-to-be-Revisited, should provide a brief narrative describing the material weaknesses corrected in the current year, including the most significant actions taken to correct each weakness. Significance shall be determined according to subjective management decisions. This section will include all material weaknesses corrected that were identified in either the current or prior year(s). The data elements are similar to the data elements in Tab B-2, and therefore, follow the general rules for Tab B-2 when completing Tab B-3. For each corrected material weakness, the last completed milestone will describe the method used to validate the corrective action including a certification that the corrective action effectively resolved the weakness.
- All DON MAUs are required to provide input to the annual DON Statement of Assurance by submitting a MIC Certification Statement in two formats: both soft- and hard-copy.
- All DON MAUs and their immediate subordinates must maintain risk and internal control assessments.
- The command must conduct a MIC plan that captures the organization's approach to implementing an effective internal control program, and serves as the first resource MIC coordinators use to understand their organization's program.
- The MIC plan shall be updated as needed and may take any form, but must identify the following key elements:

1. The organization's senior official overseeing the MIC program, the MIC coordinator and the alternate MIC coordinator;
  2. An overview of the MIC program as related to the Government Accountability Office standards for internal control;
  3. A description of risk assessment methodology;
  4. A description of monitoring/internal control assessment methodology;
  5. A description of how to develop and track corrective action plans;
  6. MIC training efforts; and
  7. The date the plan was last updated.
- DON MIC program training is required for coordinators and alternates in order to provide an overview of the DON MIC program.
  - There is a DON MIC Training for Managers course that provides DON managers with a foundation for understanding internal controls and the DON MIC program. Managers training is designed for managers and does not meet the requirements for MIC coordinators or their alternates.
  - All DON MAUs and their immediate subordinates must maintain Corrective Actions for Reportable Conditions and Material Weaknesses.
  - Managers are to: (1) promptly evaluate findings from audits and other reviews, including those showing deficiencies and recommendations reported by auditors and others who evaluate agencies' operations; (2) determine proper actions in response to findings and recommendations from audits and reviews; and (3) complete, within established time frames, all actions that correct or otherwise resolve the matters brought to management's attention.

**SECNAV Instruction 5200.35F, "Department of the Navy Managers' Internal Control Program," dated 21 July 2014.** This manual specifies procedures for implementing an effective internal control program throughout DON, including the following:

- The Assessable Unit Manager (AUM) will be an individual at the division, department, chief, and/or director level who understands the daily operations.
- The AUM should be properly trained to conduct risk and internal control assessments of their daily/primary operations.
- MAUs and/or commands shall perform internal controls and risk assessments. The following tools may assist in internal controls and risk assessments:
  1. Process narratives and flowcharts;
  2. Risk assessment templates; and

### 3. Self-assessment forms.

- Organizations are encouraged to utilize other contributing information (i.e. performance metrics, external audits, inspections, investigations, etc.) as methods of monitoring and evaluating internal controls effectiveness.
- MAUs and their immediate subordinate organizations shall oversee and perform risk assessments, control assessments, and self-assessments through the use of tools (i.e., templates for risk assessment and IC assessment).
- A MIC plan consists of a brief, written plan (updated as needed) that documents the key elements: mission, strategy, MIC training efforts, and methodologies used by an organization to assess internal controls.
- The MIC coordinator and alternate shall support the MIC program and internal controls oversight to ensure the MAU is adhering to the current policies and procedures, notify MAU MIC personnel of MIC training opportunities to ensure all training requirements are satisfied, and provide training opportunities to immediate subordinate commands and followup on the corrections and milestone progress for reported deficiencies.
- The MIC coordinator and alternate shall assist AUMs with determining if an identified control deficiency is a Material Weakness, Reportable Condition, or Item-to-be-Revisited, and facilitate a relationship with AUMs to assist in identifying, tracking, and developing corrective actions and milestones to correct deficiencies.

## Scope and Methodology

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We performed this audit of the internal controls over the administration and oversight of the law enforcement training program for contract number N00178-06-D-4759-V702, during the period of 5 February 2015 to 8 September 2015. We found there were no prior Department of Defense Inspector General, Government Accountability Office, or Naval Audit Service reports published in the past 5 years related to our audit. Therefore, audit followup was not required. Additionally, a data reliability assessment was not required as computer-processed data was not used throughout the course of our audit.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The scope of the audit included the civilian law enforcement training standards from contract number N00178-06-D-4759-V702, dated 28 August 2014, the approval process used for determining the civilian law enforcement training curriculum, and the Managers' Internal Control (MIC) program for Fiscal Years (FYs) 2014 and 2015. We conducted a site visit at Homeland Security Solutions Incorporated (HSSI) located in Alexandria, VA, to discuss and obtain information regarding the civilian law enforcement training curriculum.

We analyzed the effectiveness of the internal controls over the administration and oversight of the law enforcement training program for contract number N00178-06-D-4759-V702. Specifically, we performed three analyses: a training comparison analysis, a training approval process analysis, and a MIC program analysis.

We interviewed personnel from the Marine Corps (MC) Plans, Policies, and Operations (PP&O), Law Enforcement and Corrections (PSL) division and DoD Law Enforcement Policy and Support personnel to determine whether the content taught throughout the MC Basic Police Officer Course Program satisfies meeting DoD minimum requirements, and whether the existing training approval process over the development of civilian training courses is in accordance with guidance. In addition, we interviewed the MC PP&O MIC program coordinator and Headquarters Marine Corps (HQMC), Programs and Resources (P&R) – Risk and Compliance Branch (RFK) MIC program coordinators, to determine the MIC program process.

**Analysis of Training Comparison.** We interviewed the MC Deputy Branch Head of PP&O, PSL, PP&O, PSL personnel and the DoD Director of Law Enforcement Policy and Support to determine the content taught within the MC Basic Police Officer Course Program and how it satisfies meeting DoD minimum requirements. We obtained and analyzed the MC Basic Police Officer Course Program of Instruction to determine whether it was conducted in accordance with DoD Instruction 5525.15, “Police Minimum Training Tasks.” We then compared enabling learning objectives, stated within each class taught throughout the MC Basic Police Officer Course Program of Instruction, to DoD requirements and summarized our results.

**Analysis of Training Approval Process.** We interviewed the MC Deputy Branch Head of PP&O, PSL and the Accreditation Assessment Tool Program Manager to determine the training approval process used by the MC PP&O office. We reviewed relevant sections of the Federal Law Enforcement Training Accreditation (FLETA) Approval Notice and Assessment Report, in addition to obtaining and reviewing various documents submitted by PP&O, PSL for FLETA accreditation to determine support for the Marine Corps Civilian Law Enforcement Program training approval process. Additionally, we compared the Marine Corps Police Academy Policy and Procedures Manual to the training approval process obtained during interviews, to determine whether PP&O, PSL was in accordance with local guidance.

**Managers’ Internal Control (MIC) Program.** We interviewed key PP&O, PSL personnel and PP&O’s MIC program coordinator, as well as the HQMC P&R – RFK MIC program coordinators, to determine the policies and procedures in place for the MIC program. In addition, we obtained and reviewed FYs 2014 and 2015 MIC program Certification Statements, and the FY 2014 Statement of Assurance. After reviewing the documentation collected, we then compared it to Secretary of the Navy Instructions M-5200.35, “Department of the Navy Managers’ Internal Control Manual” and 5200.35F, “Department of the Navy Managers’ Internal Control Program,” as well as the information we received through interviews regarding the MIC process to ensure the MIC program was being conducted in accordance with guidance.

Enclosure 4:

# Management Response from Commandant of the Marine Corps



DEPARTMENT OF THE NAVY  
HEADQUARTERS UNITED STATES MARINE CORPS  
3000 MARINE CORPS PENTAGON  
WASHINGTON, DC 20380-3000

IN REPLY REFER TO:  
7510  
DMCS-A  
24 NOV 2015

MEMORANDUM FOR PRINCIPAL DIRECTOR, INTERNAL CONTROL AND  
INVESTIGATIVE SUPPORT AUDITS, NAVAL AUDIT  
SERVICE

Subj: RESPONSE TO NAVAL AUDIT SERVICE (NAVAUDSVC) DRAFT  
AUDIT REPORT 2015-045, INTERNAL CONTROLS OVER THE  
MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM, DATED  
8 SEPTEMBER 2015

Ref: (a) NAVAUDSVC Memo 7510 2015-045 dated 8 Sep 15

Encl: (1) Marine Corps Comments on Recommendations 1 through 4  
(2) Marine Corps Comments on Recommendations 5 through 7

1. Official responses required by the reference are provided at the enclosures.
2. With regards to recommendation 6, the estimated completion date of corrective actions is May 31, 2016.
3. The Marine Corps appreciates the opportunity to respond to the draft report.
4. If you have any questions about the responses, please contact [REDACTED], Head, Audit Coordination, email [REDACTED] or phone [REDACTED], [REDACTED], or DSN [REDACTED].

[REDACTED]  
[REDACTED]  
Executive Assistant  
Director, Marine Corps Staff

Copy to:  
NAVINGEN (N14)  
IGMC  
DC, P&R  
DC, PP&O  
CL

FOIA (b)(6)

FOIA (b)(6)

NAVAL AUDIT SERVICE (NAVAUDSVC)  
DRAFT REPORT DATED 8 SEPTEMBER 2015  
2015-045

"INTERNAL CONTROLS OVER THE MARINE CORPS CIVILIAN LAW ENFORCEMENT  
PROGRAM"

UNITED STATES MARINE CORPS COMMENTS  
TO THE NAVAUDSVC RECOMMENDATIONS

NAVAUDSVC recommends that the Commandant of the Marine Corps direct the Headquarters Marine Corps, Programs and Resources - Risk and Compliance Branch, Managers' Internal Control Program Coordinator:

**RECOMMENDATION 1:** Create and implement a Managers' Internal Control [MIC] plan that includes each of the seven mandatory key elements stated in Secretary of the Navy Instruction M-5200.35.

**USMC RESPONSE:** The USMC concurs with the recommendation. During the March 2015 Senior Assessment Team (SAT) meeting, the HQMC MICP Coordinator briefed that the Managers' Internal Control plan would be a mandatory requirement beginning FY 2016. The HQMC MICP Coordinator and Alternate Coordinator have met with some assessable unit managers via phone and in person to provide guidance and direction regarding the overall process of establishing a MIC plan. Most assessable unit managers have been proactive in developing and implementing a MIC plan.

On 7 October 2015, the HQMC MICP Coordinator briefed the SAT regarding the mandatory requirement for each major assessable to develop and implement an annual MIC plan - incorporating periodic assessments of high risk areas.

The HQMC MICP Coordinator will request that each assessable unit complete and submit an annual MIC plan detailing the area(s) to be assessed and timelines of assessments. The HQMC MICP Coordinator will review and maintain a copy of each assessable unit's plan upon completion and submission.

Estimated completion date: MIC Plan Development - December 31, 2015; Implementation of MIC Plan - March 31, 2016.

**RECOMMENDATION 2:** Establish sub-assessable units for each major assessable unit to ensure that the Managers' Internal Control process is structured in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.

Subj: RESPONSE TO NAVAL AUDIT SERVICE (NAVAUDSVC) DRAFT  
AUDIT REPORT 2015-045, INTERNAL CONTROLS OVER THE  
MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM, DATED  
8 SEPTEMBER 2015

**USMC RESPONSE:** The USMC partially concurs with the recommendation. The HQMC MICP Coordinator and Alternate will communicate to each major assessable unit manager the requirement to establish sub-assessable units if they determine that sub-assessable units increase the ability to detect weaknesses impacting the organization's mission or the major assessable unit manager oversees an organization so large as to prevent its manager from performing a meaningful evaluation of the internal controls without expending an extensive amount of effort or resources. The estimated completion date of corrective actions in response to recommendation 2 is February 29, 2016.

**RECOMMENDATION 3:** Appoint Assessable Unit Managers at the sub-activity level.

**USMC RESPONSE:** The USMC partially concurs with the recommendation. The HQMC MICP Coordinator and Alternate will communicate to each major assessable unit manager the requirement to appoint sub-assessable managers if they determine that sub-assessable managers increase the ability to detect weaknesses impacting the organization's mission or the major assessable unit manager oversees an organization so large as to prevent its manager from performing a meaningful evaluation of the internal controls without expending an extensive amount of effort or resources. The estimated completion date of corrective actions in response to recommendation 3 is December 31, 2015.

**RECOMMENDATION 4:** Establish internal controls to ensure oversight of the Managers' Internal Control Program in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F.

**USMC RESPONSE:** The USMC partially concurs with the recommendation. The HQMC MICP Coordinator understands, acknowledges, and concurs that sufficient oversight is required to implement a viable internal controls program throughout the Marine Corps. We do not agree with the assertion presented in the audit report that the Marine Corps did not certify and conduct its Statement of Assurance (SOA) within statutory and regulatory guidance.

We will continue to discuss organizational requirements with Marine Corps senior leaders to ensure we meet the key provisions of the the Secretary of the Navy guidance and ensure that proper governance exists within the Marine Corps to oversee the critical tenets of the Manager's Internal Control Program. The primary role for HQMC P&R (RFK) Branch is to ensure thorough coordination with major assessable units and sub-assessable units (if applicable) and serve as the principal advocate for the Senior

Subj: RESPONSE TO NAVAL AUDIT SERVICE (NAVAUDSVC) DRAFT  
AUDIT REPORT 2015-045, INTERNAL CONTROLS OVER THE  
MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM, DATED  
8 SEPTEMBER 2015

Assessment Team to adjudicate and validate material weaknesses and reportable conditions reported on the Marine Corps Statement of Assurance (SOA). The HQMC P&R (REK) Branch is also the governance to coordinate with stakeholders to define and implement corrective actions based on audit, SOA or other self-reported findings or control deficiencies.

In an effort to increase its oversight of the MICP throughout the Marine Corps, the MICP Coordinator will:

- Strengthen communication efforts with all USMC command elements at the major assessable unit level and establish communication efforts at the sub-assessable unit level immediately following establishment.
- Coordinate with the Office of the Inspector General of the Marine Corps to review weaknesses/conditions reported via the annual Risk and Opportunity Assessment (ROA).
- Assess organizational requirements to coordinate or conduct on-site assessments or validation testing to provide reasonable assurance that corrective actions are in place and assessable/sub-assessable unit managers sustain oversight of internal controls within their organizations.

The estimated completion date of corrective actions in response to recommendation 4 is May 31, 2016.



DEPARTMENT OF THE NAVY  
HEADQUARTERS US MARINE CORPS  
3000 MARINE CORPS PENTAGON  
WASHINGTON, D.C. 20350-3000

IN REPLY REFER TO  
5200  
PS  
8 Oct 15

From: Assistant Deputy Commandant, Plans, Policies and Operations  
Security Division, (PS)  
To: Naval Audit Service

Subj: RESPONSE TO NAVAL AUDIT REPORT 2015-0045, INTERNAL CONTROLS  
OVER THE MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM

Ref: (a) Naval Audit Service Audit Report 2015-045  
(b) SECNAVINST 5200.35F

1. Following a review of the subject draft report, the Deputy Commandant, Plans, Policies, and Operations (DC, PP&O) concurs with the reports' findings and specific recommendations pertaining to the Managers Internal Control (MIC) Program. The following responses are provided to those recommendations addressed to DC, PP&O.

Recommendation 5: Provide Department of the Navy Manager's Internal Control Training for Managers to ensure that the Assessable Unit Managers are performing their responsibilities and maintaining the appropriate documentation as stated in Secretary of the Navy Instruction M-5200.35 and 5200.35F.

USMC (PSL) Response: Law Enforcement and Corrections Branch (PSL) will coordinate with PP&O MIC Coordinator and P&R for MIC process training. PSL will conduct risk assessment to MCCLEP program as outlined in ref (b) and develop appropriate controls. The expected completion date is December 2015. See the Corrective Action Plan.

Recommendation 6: Establish internal controls to ensure that the Manager's Internal Control Certification Statements for Plans, Policies, and Operations and each sub-activity includes each of the five mandatory elements stated in Secretary of the Navy Instruction M5200.35.

USMC (PSL) Response: PSL as a sub-activity under PP&O will provide inputs to the PP&O statement of assurance to be incorporated into the PP&O MIC certification statements. Estimated completion date is the next reporting period as outlined in ref (b).

Encl (2)

Subj: RESPONSE TO NAVAL AUDIT REPORT 2015-0045, INTERNAL CONTROLS  
OVER THE MARINE CORPS CIVILIAN LAW ENFORCEMENT PROGRAM

Recommendation 7: Establish internal controls to maintain the internal control and risk assessments performed by the sub-activities for all of the Plans, Policies, and Operation's reporting categories and functional areas reviewed.

USMC (PSL) Response: As a sub-activity under PP&O MIC program, PSL will provide the necessary risk assessments performed for MCCLEP to PP&O MIC Coordinator. Estimated date of completion for risk assessment is December 2015.

2. PP&O, PSL MCCLEP program manager will comply with ref (b) and provide PP&O MIC Coordinator with necessary information to support MIC program overall.

3. Point of contact for MCCLEP program is [REDACTED],  
[REDACTED],  
[REDACTED],  
[REDACTED],  
[REDACTED]

FOIA (b)(6)

Acting

PP&O Management Internal Controls (MIC): Corrective Action Plan (CAP)  
Reference Navy Audit Service Report 2015-45

<b>Title of Deficiency (Limit to 100 characters)</b>			
Naval Audit Service obtained and reviewed Fiscal Years (FYs) 2014 and 2015 MIC program Certification Statements, and the FY 2014 Statement of Assurance (SOA) to determine whether the MIC program was being conducted in accordance with the Secretary of the Navy (SECNAV) Instructions M-5200.35 and 5200.35F. We determined that HQMC, P&R - RFK's and PP&O's MIC program coordinators did not ensure that the MIC program was conducted in accordance with guidance.			
<b>Description of Deficiency (Limit to 5,000 characters)</b>			
Naval Audit Service recommend that the Commandant of the Marine Corps direct the Headquarters Marine Corps, Program and Resources – Risk and Compliance Branch, Managers' Internal Control program coordinator: <b>Recommendation 1.</b> Create and implement a Managers' Internal Control plan that includes each of the seven mandatory key elements stated in Secretary of the Navy Instruction M-5200.35. <b>Recommendation 2.</b> Establish sub-assessable units for each major assessable unit to ensure that the Managers' Internal Control process is structured in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F. <b>Recommendation 3.</b> Appoint Assessable Unit Managers at the sub-activity level. <b>Recommendation 4.</b> Establish internal controls to ensure oversight of the Managers' Internal Control Program in accordance with Secretary of the Navy Instructions M-5200.35 and 5200.35F. We recommend that the Commandant of the Marine Corps direct the Headquarters Marine Corps Plans, Policies, and Operations' Managers' Internal Control program coordinator: <b>Recommendation 5.</b> Provide Department of the Navy Managers' Internal Control Training for Managers to ensure that the Assessable Unit Managers are performing their responsibilities and maintaining the appropriate documentation at stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F. <b>Recommendation 6.</b> Establish internal controls to ensure that the Managers' Internal Control Certification Statements for Plans, Policies, and Operations and each sub-activity includes each of the five mandatory elements stated in Secretary of the Navy Instruction M-5200.35. <b>Recommendation 7.</b> Establish internal controls to maintain the internal control and risk assessments performed by the sub-activities for all of Plans, Policies, and Operation's reporting categories and functional areas reviewed.			
<b>Functional Category (Mark "X" in applicable functional category)</b>			
a. Communications	<input type="checkbox"/>	b. Intelligence	<input type="checkbox"/>
c. Security	<input type="checkbox"/>	d. Comptroller and Resource Management	<input type="checkbox"/>
e. Contract	<input type="checkbox"/>	f. Force Readiness	<input type="checkbox"/>

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Administration					
g. Information Technology				h. Acquisition	
i. Manufacturing, Maintenance, and Repair				j. Other	X
k. Personnel and Organizational Management				l. Procurement	
m. Property Management				n. Research, Development, Test, and Evaluation	
o. Security Assistance				p. Supply Operations	
q. Support Services					
Notes (if applicable)					
<b>Deficiency Type (Mark "X" in applicable deficiency type)</b>					
a. Material Weakness (MW)	X	b. Reportable Condition (RC)			
<b>Justification (Mark "X" in applicable justification(s))</b>					
a. Threat to Image	X	b. Threat to Mission			
c. Threat to Resources					
Notes (if applicable)					
<b>Organization (Insert "Organization Name")</b>					
Headquarters Marine Corps Plans, Policies, and Operations					
<b>Senior Accountability Official (Insert "Full Name, Title, email, and Phone Number")</b>					
██████████, PP&O MICP Coordinator, ██████████, ██████████					
<b>Year Identified (Insert "Fiscal Year")</b>					
2015					
<b>Original Targeted Correction Date (Insert "Quarter, Fiscal Year")</b>					
N/A					
<b>Targeted Correction Date in Last Year's Report (Insert "Quarter, Fiscal Year")</b>					
N/A					
<b>Current Target Date (Insert "Quarter, Fiscal Year")</b>					
1Q FY16					
<b>Reason for Change in Dates (Limit to 5,000 characters)</b>					
N/A					
<b>Validation Process (Limit to 5,000 characters)</b>					
1. Copy of training certificates					
2. Reporting of completed internal control assessments					
<b>Results Indicator (Limit to 5,000 characters)</b>					

FOIA (b)(6)

Better management oversight by Assessable Unit Manager (AUM) to ensure performance of responsibilities and maintaining the appropriate documentation at stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F.	
<b>Source(s) Identifying Deficiency (Limit to 5,000 characters)</b>	
PP&O's MIC program coordinator did not maintain documentation to support the performance of risk and internal control assessments for PP&O's MIC program, identify or train AUMs, or submit complete MIC Certification Statements in accordance with SECNAV guidance. We determined this occurred because PP&O's MIC program coordinator did not provide sufficient oversight. As a result, the PP&O MIC program coordinator does not have reasonable assurance that internal controls over PP&O's MIC program were sufficient to prevent or detect fraud, waste, and abuse. In addition, due to the FYs 2014 and 2015 MIC Certification Statements not being appropriately reported, PP&O could not appropriately provide an unqualified statement of reasonable assurance that PP&O's system of internal controls met the objectives of the FMFIA program's	
<b>Milestones</b>	
<b>Milestone (1)</b>	
a. Title	Provide Department of the Navy Managers' Internal Control Training for Managers to ensure that the Assessable Unit Managers are performing their responsibilities and maintaining the appropriate documentation at stated in Secretary of the Navy Instructions M-5200.35 and 5200.35F.
b. Date (Quarter, Fiscal Year)	1Q FY16
c. Status (Completed, In Progress, or Planned)	Planned
d. Completion Percentage	0%
e. Detailed Comments	Training will be completed by December 2015
<b>Milestone (2)</b>	
a. Title	Create and implement a Managers' Internal Control plan that includes each of the seven mandatory key elements stated in Secretary of the Navy Instruction M-5200.35.
b. Date (Quarter, Fiscal Year)	1Q FY16
c. Status (Completed, In Progress, or Planned)	In Progress
d. Completion Percentage	0%
e. Detailed Comments	Establish internal controls to ensure oversight of the Managers' Internal Control Program in accordance with

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ENCLOSURE 4: MANAGEMENT RESPONSE FROM COMMANDANT OF THE MARINE CORPS

	Secretary of the Navy Instructions M-5200.35 and 5200.35F.
<b>Milestone (3)</b>	
a. Title	Appoint Assessable Unit Managers at the sub-activity level.
b. Date (Quarter, Fiscal Year)	1Q FY16
c. Status (Completed, In Progress, or Planned)	In Progress
d. Completion Percentage	0%
e. Detailed Comments	Management will maintain an updated listing of the assessable units, along with their purpose and objectives, and use the list when planning any review of the system of internal controls.
<b>Point of Contact (Insert "Full Name, Title, email, and Phone Number")</b>	
	PP&O MICP Coordinator, [REDACTED], [REDACTED]

FOIA (b)(6)

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