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Arlington, VA 22202-4704
MEMORANDUM FOR THE DEPUTY ASSISTANT SECRETARY OF DEFENSE  
(COUNTERNARCOTICS and GLOBAL THREATS)

Report of the Funds Obligated for National Drug Control Program Activities  
(Report No. D-2010-040)

Public Law 105-277, section 701, is known as “The Office of National Drug Control  
Policy Reauthorization Act of 1998” (the Act). The Act requires that DOD annually  
submit a detailed report (the Report) to the Director of the Office of National Drug  
Control Policy accounting for all funds DOD expended for National Drug Control  
Program activities during the previous fiscal year. The Public Law was reauthorized by  
Public Law 109-469 in December 2006. The Act requires that the Inspector General of  
the Department of Defense authenticate the Report prior to its submission to the Director.

Office of National Drug Control Policy Circular “Drug Control Accounting,” (the  
Accounting Policy Circular) May 1, 2007, provides the policies and procedures DOD  
must use to prepare the Report and authenticate the DOD funds expended on National  
Drug Control Program activities. The Accounting Policy Circular specifies that the  
Report must contain a table of prior year drug control obligations, listed by functional  
area, and include five assertions relating to the obligation data presented in the table.

The Deputy Assistant Secretary of Defense (Counternarcotics and Global Threats)  
[DASD (CN & GT)] was responsible for the detailed accounting of funds obligated and  
expended by DOD for the National Drug Control Program for FY 2009. We have  
reviewed the DASD (CN & GT) detailed accounting in accordance with the attestation  
standards established by the American Institute of Certified Public Accountants and in  
compliance with generally accepted government auditing standards. We performed a  
review-level attestation, which is substantially less in scope than an examination done to  
express an opinion on the subject matter. Accordingly, we do not express an opinion.

We reviewed three DOD reprogramming actions that allocated $1,397.2 million among  
the Military Departments, National Guard, and Defense agencies. We reviewed the year-  
end obligation report and determined that DASD (CN & GT) allocated the funds to  
appropriations and project codes intended for the DOD Counterdrug program.

The DOD Office of Inspector General previously identified a material management  
control weakness related to the DOD Components’ accounting for Counterdrug funds. In  
response to our identification of this weakness, DASD (CN & GT) issued a policy
memorandum on August 25, 2005, requiring detailed transaction support for all Counterdrug obligations.

As part of our review attestation for FY 2009, we determined whether the DOD Components that received Counterdrug funding from DASD (CN & GT) had implemented procedures to support reported obligations with detailed transaction listings. We requested and obtained the listings that were available for reported obligations. We were able to obtain the majority of detailed transactions for the Military Component obligations.

DASD (CN & GT) provided us the Report in a letter dated December 18, 2009, which we reviewed to determine compliance with the Accounting Policy Circular. The detailed accounting indicated that during FY 2009 the DOD obligated $1,240.4 million in the Counterdrug program functional areas. The Office of the DASD (CN & GT) compiled the Report from data the Military Departments and other DOD Components submitted.

DASD (CN & GT) initially reprogrammed the funds from the Central Transfer Account to the DOD Components, using project codes. The DOD Components provided year-end obligation data to DASD (CN & GT) through the DASD CN database which compiled the data into one obligation report. In order to present the obligations by functional area in compliance with the Accounting Policy Circular, DASD (CN & GT) applied percentages to each project code in the consolidated report to compute the amounts presented in the table of obligations instead of obtaining the information directly from the accounting systems.

Based on our review, except for the DASD (CN & GT) use of percentages to calculate the obligations presented by functional area, nothing came to our attention during the review that caused us to believe the detailed accounting of funds obligated by DOD on the National Drug Control Program for FY 2009 is not presented, in all material respects, in conformity with the Accounting Policy Circular.

Patricia A. Marsh, CPA
Assistant Inspector General
Defense Business Operations
Mr. Jon Rice  
Associate Director  
Performance and Budget  
Office of National Drug Control Policy  
750 17th Street, NW  
Room 535  
Washington, DC 20503

Dear Mr. Rice:

The drug methodology used to calculate obligations by drug control function of Fiscal Year 2009 budgetary resources is reasonable and accurate. The obligation table in Tab A was generated by the methodology as reflected in Tab B. The obligations are associated with a financial plan that properly reflects all changes made during the fiscal year. The Counternarcotics Central Transfer Account does not receive Fund Control. Notice. Performance Reporting will be addressed under separate correspondence.

William F. Wechsler  
Deputy Assistant Secretary of Defense  
Counternarcotics and Global Threats

Enclosures:  
As stated

CF:  
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**UNCLASSIFIED**

**Counternarcotics Central Transfer Account Obligations**

($000)

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<thead>
<tr>
<th>ONDCP Resource Categories</th>
<th>FY-09</th>
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<tbody>
<tr>
<td>Intelligence: Dom Law Enforcement</td>
<td>41,989</td>
</tr>
<tr>
<td>Intelligence: Interdiction</td>
<td>33,236</td>
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<tr>
<td>Intelligence: International</td>
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<td>Interdiction</td>
<td>318,208</td>
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<td>Investigative</td>
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<td>Prevention</td>
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<td>Prosecution</td>
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<tr>
<td>R&amp;D: Interdiction</td>
<td>21,741</td>
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<tr>
<td>R&amp;D: International</td>
<td>2,268</td>
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<tr>
<td>State and Local Assistance</td>
<td>151,760</td>
</tr>
<tr>
<td>Treatment</td>
<td>8,094</td>
</tr>
</tbody>
</table>

**TOTAL** 1,240,435

* This amount includes a 0.99% obligation rate for MILPERS and a 0.98% obligation rate for O&M. Investment appropriations, which are multi-year, are currently obligated at 0.31%.

**DRUG RESOURCES PERSONNEL SUMMARY**

| Total FTEs       | 1,528 |

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Tab A
Central Transfer Account

The Counternarcotics Central Transfer Account (CTA) was established in PBD 678 in November 1989. Under the CTA, funds are appropriated by Congress to a single budget line, not to the Services baselines. The CTA accounts for all counternarcotics resources for the Department of Defense with the exception of OPTEMPO and Active Duty MILPERS. Funds are reprogrammed from the CTA to the Services and Defense Agencies in the year of execution. The CTA allows for greater execution flexibility in the counternarcotics program with the ability to realign resources to address changes in requirements. The CTA is essential to respond effectively to the dynamic nature of the drug threat.

The Office of National Drug Control Policy (ONDCP) reports within the National Drug Control Strategy the amount of funds appropriated to the counternarcotics CTA. The actual obligations for the counternarcotics program for a particular fiscal year differ from the amount released to the CTA since some of the DoD counternarcotics effort is executed with multi-year funding.

The reprogramming process begins with reprogramming documents (DD1415 and DD1105) prepared by the Office of the Deputy Assistant Secretary of Defense for Counternarcotics and forwarded to DoD Comptroller. Funds are reprogrammed to the applicable appropriation/budget activity at the Service/Defense Agency by project (e.g., Navy’s Fleet Support, Hemispheric Radar System, Counternarcotics RDT&E). The internal reprogramming (IR) action requires no congressional notification/approval.

The Services/Defense Agencies have their own internal accounting systems for tracking obligations of funds transferred from the Counternarcotics CTA. The following examples provide the process of how obligations are tracked:

- The Army Budget Office receives obligation data from the Defense Finance and Accounting System (DFAS) on a monthly basis and funds are tracked by the DFAS/Standard Army Financial Information System (STANFINS).
- The Air Force uses the USAF General Accounting & Finance System (GAFS) and the Commanders Resources Integration System (CRIS) to track obligations. Both of these systems are utilized for Counternarcotics obligations and commitments. These systems interface directly with the DFAS.
- The Navy uses the Standard Accounting and Reporting System, Field Level (STARS-FL) which provides the means of tracking allocated counternarcotics funds through the life cycle of the appropriation at the activity/field level. Navy counternarcotics funding is recorded under separate cost centers and sub-cost centers, with a line of accounting consisting of subhead, project units and cost codes specifically for counternarcotics obligation tracking.
- The Army and Air National Guard employs a central accounting service from the DFAS to consolidate, aggregate, and report on funds as they are committed, obligated, and expended. The Army State and Federal Program Accounting Codes and the Air
Accounting Codes provide funds-tracking mechanisms to reconcile funding at various levels of reporting and execution.

The Services/Defense Agencies provide quarterly obligation reports by project code to the Office of the Deputy Assistant Secretary of Defense for Counternarcotics (CN). Beginning in FY 2008, the collection of obligation data has been via the DASD CN database and compiled into a single counternarcotics obligation report. The obligation and expenditure data provided by the Services/Defense Agencies are compared against their total annual counternarcotics funding for each appropriation. At the end of the year, the Services/Defense Agencies provide an end of year data which reflects their actual obligations, not an estimation.

The quarterly obligation data collected is by project code, not down to the drug control function. In order to comply with ONDCP's circular and provide obligation data by function, it was necessary to use percentages for each project code.