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United States
Department of Defense



DoD Needs to Improve Vocational Training Efforts to
Develop the Afghan National Security Forces
Infrastructure Maintenance Capabilities

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Acronyms and Abbreviations

AED-N	Afghanistan Engineering District-North
AED-S	Afghanistan Engineering District-South
ANSF	Afghan National Security Forces
COR	Contracting Officer's Representative
CSTC-A	Combined Security Transition Command-Afghanistan
FAR	Federal Acquisition Regulation
GIRoA	Government of the Islamic Republic of Afghanistan
ITAG	Infrastructure Training Advisory Group
ITT	ITT Systems Corporation
NTM-A	North Atlantic Treaty Organization Training Mission-Afghanistan
QASP	Quality Assurance Surveillance Plan
USACE	U.S. Army Corps of Engineers



INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
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June 18, 2012

MEMORANDUM FOR COMMANDING GENERAL, NATO TRAINING MISSION-
AFGHANISTAN/COMBINED SECURITY TRANSITION
COMMAND-AFGHANISTAN
COMMANDING GENERAL, U.S. ARMY CORPS OF
ENGINEERS
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities
(Report No. DODIG-2012-104)

We are providing this report for your review and comment. We considered comments on a draft of this report when preparing the final report. In July 2010, U.S. Army Corps of Engineers (USACE) contract officials awarded two contracts to conduct operations and maintenance services for the Afghan National Security Forces, valued at \$800 million, which included providing vocational training. However, the vocational training provided under the contracts did not effectively develop the Afghan National Security Forces' infrastructure maintenance capabilities. As a result, DoD is at an increased risk of not meeting its goal to transition facility operations and maintenance responsibilities to the Afghan National Security Forces by the end of 2014. In addition, the approximately \$10.3 billion planned U.S. investment in facilities may be diminished if the Afghan National Security Forces are unable to maintain their infrastructure.

DoD Directive 7650.3 requires that recommendations be resolved promptly. The comments from the Interim Director, CSTC-A Combined-Joint Engineering Directorate, were partially responsive. We request that by July 3, 2012, the Commander, Combined Security Transition Command-Afghanistan provide additional comments on Recommendation 1 and 2.f. The comments from the USACE Chief, Security Assistance Branch, Directorate of Military Programs, were responsive and we do not require additional comments. We also clarified subsection Performance Standards and revised and deleted our recommendations based on comments provided by the USACE Chief, Security Assistance Branch, Directorate of Military Programs.

Please provide comments that conform to the requirements of DoD Directive 7650.3. If possible, send a portable document format (.pdf) file containing your comments to audjsao@dodig.mil. Copies of your comments must have the actual signature of the authorizing official for your organization. We are unable to accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

We appreciate the courtesies extended to the staff. Please direct questions to Michael J. Roark at 703-604-9187 (DSN 312-664-9187).

Amy J. Frontz
Principal Assistant Inspector General
for Auditing



Results in Brief: DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities

What We Did

We determined whether vocational training provided under the contracts to conduct operations and maintenance services for the Afghan National Security Forces (operations and maintenance contracts) was effective in developing the Afghan National Security Forces infrastructure maintenance capabilities.

What We Found

Vocational training provided under the operations and maintenance contracts did not effectively develop Afghan National Security Forces infrastructure maintenance capabilities. Specifically, U.S. Army Corps of Engineers (USACE) and Combined Security Transition Command-Afghanistan (CSTC-A) officials did not require the contractor to implement vocational training at 9 of the 18 Afghan National Security Forces sites required by the contracts. This occurred because CSTC-A Infrastructure Training Advisory Group officials were still developing their transition strategy and assessing the feasibility of implementing training at additional sites.

In addition, USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities because officials considered the vocational training portion of the contracts to be negligible in relation to the value of operations and maintenance services to be performed.

As a result, CSTC-A will continue to be at an increased risk for not meeting its goal to transition facility operations and maintenance responsibilities to the Afghan National Security Forces by the end of 2014. In addition, the approximately \$10.3 billion planned U.S. investment in facilities may be diminished if Afghan National Security

Forces are unable to maintain their infrastructure.

What We Recommend

Among other recommendations, we recommend that CSTC-A execute existing transition strategy initiatives and develop new initiatives to accelerate development of Afghan National Security Forces infrastructure maintenance capabilities.

In addition, CSTC-A, in coordination with USACE officials, should accelerate training implementation at Afghan National Security Forces sites with an Infrastructure Training Advisory Group presence.

We also recommend that USACE, in coordination with CSTC-A officials, update the contracts and monthly contracting officer's representatives' report templates to properly monitor the contractor's performance of vocational training.

Management Comments and Our Response

The Interim Director, CSTC-A Combined-Joint Engineering Directorate, comments were partially responsive to the recommendations and the USACE Chief, Security Assistance Branch, Directorate of Military Programs, comments were responsive to the recommendations. We also revised one recommendation and deleted a recommendation based on comments provided by the USACE Chief, Security Assistance Branch, Directorate of Military Programs.

We request management comments from the Commander, Combined Security Transition Command-Afghanistan on Recommendations 1 and 2.f by July 3, 2012. Please see the recommendation table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Commander, Combined Security Transition Command-Afghanistan	1, 2.f	2.a-e
Commander, U.S. Army Corps of Engineers, Transatlantic Division		3
Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-South		4
Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-North		4

Please provide comments by July 3, 2012.

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Introduction

Objective

We performed this audit pursuant to Public Law 110-181, “National Defense Authorization Act for Fiscal Year 2008,” section 842, “Investigation of Waste, Fraud, and Abuse in Wartime Contracts and Contracting Processes in Iraq and Afghanistan,” January 28, 2008. Section 842 requires:

thorough audits...to identify potential waste, fraud, and abuse in performance of (1) Department of Defense contracts, subcontracts, and task and delivery orders for the logistical support of coalition forces in Iraq and Afghanistan; and (2) Federal agency contracts, subcontracts, and task and delivery orders for the performance of security and reconstruction functions in Iraq and Afghanistan.

Our overall objective was to determine whether vocational training provided under the contracts to conduct operations and maintenance services for the Afghan National Security Forces (ANSF) was effective in developing the infrastructure maintenance capabilities of the ANSF. See the appendix for a discussion of the audit scope, methodology, and prior coverage related to the audit objective.

Background

The strategy in Afghanistan involves conducting operations to reduce the capability and will of the insurgency, support the growth in capacity and capability of the ANSF, and facilitate improvements in governance and socio-economic development to provide a secure and sustainable environment. As the ANSF demonstrates continued growth in capacity and capability, the U.S. role will transition from one of combat to support. With the ANSF on target for meeting its approved end strength, the next few years are pivotal to the development of skilled personnel capable of executing the necessary support functions to sustain the ANSF forces. One of the support functions that the ANSF must develop before taking full responsibility for its own security by the end of 2014 is the ability to maintain their own infrastructure. The United States expects to invest approximately \$10.3 billion in the ANSF infrastructure from 2005 through 2012.

Roles and Responsibilities

The Commander, North Atlantic Treaty Organization Training Mission-Afghanistan/ Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A), is responsible for supporting the Government of the Islamic Republic of Afghanistan (GIROA) as it generates and sustains the ANSF, develops leaders, and establishes enduring institutional capacity to enable accountable Afghan-led security.¹ To fulfill part of that mission,

¹ The Commander, NTM-A/CSTC-A, executes this responsibility in coordination with North Atlantic Treaty Organization nations and partners, international organizations, donors, and nongovernmental organizations.

NTM-A/CSTC-A established the Infrastructure Training Advisory Group (ITAG), which is composed of U.S. military personnel responsible for training, mentoring, and synchronizing operations and maintenance efforts at ANSF sites. ITAG is also responsible for developing and executing a strategy to transition sustainment of the ANSF infrastructure to the GIRoA by the end of 2014. As part of that strategy, ITAG is responsible for overseeing training and mentoring initiatives, working with Afghan leaders to implement training for facility maintenance personnel at ANSF sites, and assessing the effectiveness of existing operations and maintenance services. In addition, ITAG is continually assessing the ANSF's capability to independently sustain its infrastructure through the transition process.

National Operations and Maintenance Contracts

To assist CSTC-A's efforts in the day-to-day infrastructure maintenance activities necessary to ensure that ANSF buildings and structures are properly maintained, the U.S. Army Corps of Engineers (USACE) awarded two operations and maintenance contracts. The USACE Middle East District² awarded contracts W912ER-10-D-0002 and W912ER-10-D-0003 to ITT Systems Corporation (ITT) on July 26 and 27, 2010, respectively. Both contracts were firm-fixed-price contracts with a base year and four option years, valued at \$800 million. USACE Afghanistan Engineering District-North (AED-N) managed contract W912ER-10-D-0002 and USACE Afghanistan Engineering District-South (AED-S) managed contract W912ER-10-D-0003. Table 1 illustrates the estimated value of each contract by the base and option years.

Table 1. Afghanistan Operations and Maintenance Contracts

		North	South
Contract	Ordering Period	W912ER-10-D-0002	W912ER-10-D-0003
Base Year	07/27/2010 - 07/26/2011 07/28/2010 - 07/27/2011	\$ 75,000,000	\$ 50,000,000
Option 1	07/27/2011 - 07/26/2012 07/28/2011 - 07/27/2012	75,000,000	75,000,000
Option 2	07/27/2012 - 07/26/2013 07/28/2012 - 07/27/2013	100,000,000	75,000,000
Option 3	07/27/2013 - 07/26/2014 07/28/2013 - 07/27/2014	100,000,000	75,000,000
Option 4	07/27/2014 - 07/26/2015 07/28/2014 - 07/27/2015	100,000,000	75,000,000
Total		\$450,000,000	\$350,000,000

² In August 2011, USACE realigned the USACE Transatlantic Division to oversee the activities of the USACE Middle East District, USACE Afghanistan Engineering District-North, and Afghanistan Engineering District-South.

Both contracts required ITT to provide infrastructure maintenance at ANSF sites located throughout Afghanistan. To assist CSTC-A in its training initiatives, ITT was also responsible for providing the ANSF with vocational training in the following trades: heating, ventilation, and air conditioning; electrical; carpentry; welding; painting; plumbing; and masonry. Training included classroom, on-the-job training, job shadowing, and managerial training for skilled and trade employees. During the base year, July 2010 through July 2011, the USACE contracting officer obligated \$4.2 million for vocational training. As of September 2011, the contractor invoiced for approximately \$3.0 of \$4.2 million.

U.S. Army Corps of Engineers Contract Management and Oversight

To manage and monitor the operations and maintenance contracts, USACE appointed a contracting officer from the USACE Middle East District in Winchester, Virginia. The contracting officer designated contracting officer's representatives (CORs) in Afghanistan Engineering District-South in Kandahar, Afghanistan, and Afghanistan Engineering District-North in Kabul, Afghanistan. The contracting officer was responsible for overall contract management, to include ensuring compliance with the terms and conditions of the contracts and notifying the contractor if standards are not met. The contracting officer was also responsible for approving contract modifications on behalf of the Government. The contracting officer delegated authority to CORs to verify that the contractor performed the technical requirements of the contracts. CORs also serve as quality assurance representatives responsible for monitoring the quality of infrastructure maintenance and vocational training provided under the terms and conditions of the contracts.³ As of December 2011, the contracting officer designated 26 active CORs: 15 CORs for contract W912ER-10-D-0002 (of which one was assigned to training), and 11 CORs for contract W912ER-10-D-0003 (of which none⁴ were assigned to training).

Review of Internal Controls

DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses at USACE. Specifically, USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities to assess vocational training in accordance with Federal Acquisition Regulations. We will provide a copy of this report to senior officials in charge of internal controls at USACE.

³ For consistency in the report, we will use the term "COR" when referring to the roles and responsibilities of a quality assurance representative.

⁴ An individual was selected to be the COR for training but as of December 31, 2011 was still not officially designated with a COR designation letter.

Finding. Vocational Training Provided Did Not Effectively Develop Afghan National Security Forces Infrastructure Maintenance Capabilities

Vocational training provided under the two Afghanistan operations and maintenance contracts did not effectively develop ANSF infrastructure maintenance capabilities. Specifically, USACE and CSTC-A officials did not require the contractor to implement vocational training at 9 of the 18 ANSF sites as required by the contracts in the base year because ITAG officials were still developing their transition strategy and assessing the feasibility of implementing training at additional sites. In addition, USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities because officials considered the vocational training portion of the contracts to be negligible in relation to the value of operations and maintenance services to be performed. As a result, CSTC-A will continue to be at an increased risk for not meeting its goal to transition operations and maintenance responsibilities to the ANSF by the end of 2014. In addition, the approximately \$10.3 billion planned U.S. investment in facilities through 2012 may be diminished if ANSF is unable to maintain their infrastructure.

Contract Vocational Training Requirements

Both operations and maintenance contracts contained the same vocational training requirements. During the base year, the contracts required ITT to design and implement a training program using classroom and practical learning at nine ANSF sites in northern Afghanistan by December 1, 2010, at an estimated value of \$2.2 million; and nine ANSF sites in southern Afghanistan by December 1, 2010, at an estimated value of \$2 million.⁵ After USACE identifies the sites, in coordination with CSTC-A and ANSF personnel, the contracts state that training at the 18 sites was to be

conducted for the purpose of and subsequent transfer of responsibility of all O&M [operation and maintenance] functions and services provided in the contracts to the ANSF and Contractor trained workforce. The KO/ACO [contracting officer/administrative contracting officer] shall identify additional sites as recommended by the Contractor or the MOD/MOI [Ministry of Defense/Ministry of Interior] and CSTC-A to provide additional training classes. Transfer of responsibility of O&M [operation and maintenance] functions and services provided in this contract to the ANSF following base year training shall be determined on a case by case basis and approved by the KO/ACO [contracting officer/administrative contracting officer]. Additional transfer of O&M

⁵ Although the contracts required ITT to implement a training program at an additional 40 ANSF sites in northern and southern Afghanistan, the timeframe in the contract for when ITT had to implement training at those 40 ANSF sites was not clear. Therefore, we reported the conservative estimate of 18 ANSF sites for which ITT was required to provide training in the base year.

[operation and maintenance] services shall occur in the second and third option years, with the **end state being total transfer of responsibility and operation of O&M [operation and maintenance] facilities and systems to the ANSF**. All additional transfers of O&M [operation and maintenance] services shall be determined on a case by case basis and approved by the KO/ACO [contracting officer/administrative contracting officer]. **[emphasis added]**

DoD Officials Did Not Require the Contractor to Implement Vocational Training Requirements in Accordance With the Contracts

USACE and CSTC-A officials did not require that the contractor implement vocational training at 9 of the 18 ANSF sites as required by the contracts in the base year. Instead, in November 2010, a USACE official verbally directed ITT to consolidate current training efforts and begin training at one site, the Construction and Property Management Department Facility Engineer Vocational and Technical Training School (vocational school) in Kabul, Afghanistan. A USACE official directed this change because CSTC-A made a commitment to the Afghan National Army Construction and Property Management Department Commander to provide training at the vocational school.

Figure 1. Afghan National Army Electrical Training



According to a USACE official, a CSTC-A official requested ITT's delay in implementing vocational training at the remaining sites until the vocational school was operational in January 2011.⁶ It was not until February 2011, approximately 6 months after the base year began, that the USACE contracting officer instructed ITT to begin vocational training at additional sites. See Table 2 for a list of the nine sites that had vocational training by the end of the base year and the additional eight sites with vocational training as of December 2011.

⁶ The vocational school provided 60 ANSF students a 6-month classroom education in math, computers, and Dari, combined with practical learning exercises in facilities maintenance trades (such as carpentry, plumbing, and painting). Sixty students attended the first session from January through July 2011. Approximately 60 students were enrolled in the second session from October 2011 to March 2012.

Table 2. ANSF Vocational Training Status

ANSF Site	Region of Afghanistan	Date ITT Implemented Vocational Training
Contract Base Year		
Vocational School	North	January 2011
Camp Sayar	South	January 2011
Camp Hero	South	March 2011
Camp Darulaman	North	April 2011
Kabul Military Training Center	North	April 2011
North Kabul International Airport ¹	North	April 2011
Camp Commando	North	May 2011
Parsa ¹	North	May 2011
National Military Hospital ²	North	May 2011
Contract Option Year 1		
Gamberi ¹	North	September 2011
Shaheen ¹	North	September 2011
Konduz ¹	North	September 2011
Pol-e Charki ¹	North	September 2011
Gardez ¹	North	November 2011
Jalalabad ¹	North	November 2011
Kabul Logistics Acquisition Center ¹	North	November 2011
Ministry of Interior ¹	North	November 2011

¹ AED-N contracting officials stated that ITT initiated vocational training at North Kabul International Airport, Parsa, Gamberi, Shaheen, Konduz, Pol-e Charki, Gardez, Jalalabad, Kabul Logistics Acquisition Center, and Ministry of Interior. However, we did not verify this data.

² National Military Hospital was the last location ITT initiated training in the contract base year.

Infrastructure Training Advisory Group Had Challenges Developing and Implementing Its Transition Strategy

The contractor did not implement vocational training at 9 of the 18 ANSF sites as required by the contracts in the base year because from July 2010 through April 2011, ITAG officials were still assessing the feasibility of implementing training at additional sites and developing their strategy to transition infrastructure maintenance capabilities to the ANSF. ITAG officials stated that they faced multiple challenges while developing the transition strategy, including insufficient ITAG personnel to fully implement training

initiatives, *tashkil*⁷ deficiencies, the ANSF Commanders' reluctance to allow maintenance personnel to participate in the training program, and difficulties in ANSF recruiting due to low pay and competency. In April 2011, ITAG completed its strategy, the ITAG Campaign Plan and Transition Matrix, outlining CSTC-A's plan for transitioning infrastructure maintenance to the ANSF by the end of 2014; however, ITAG officials at the time of our review continued to face challenges implementing the strategy.

Infrastructure Training Advisory Group Staffing Levels

ITAG officials made the decision to establish contractor-provided vocational training only at sites where ITAG mentors were present and could assess whether ANSF personnel were ready to begin training. However, ITAG did not have sufficient personnel to staff and deploy mentor teams to the 18 ANSF sites during the July 2010 to 2011 base year of the contracts. For example, from June to December 2010, ITAG staffing only increased from 7 to 22 personnel. By April 2011, when the transition plan was first completed, ITAG had 26 of the 222 personnel expected to be on staff when ITAG reaches full strength by the end of 2012.

Based on the assumption that they would receive up to 222 personnel, ITAG developed a transition strategy using a time-phased approach that would deploy mentor teams to 115 of approximately 384 ANSF sites between 2011 and 2013. At each of the 115 sites, ITAG officials anticipated an 18-month transition period to prepare the ANSF to assume responsibility for those buildings and structures that ITT maintains. During that transition period, ITT personnel would be responsible for conducting training while ITAG officials mentor the ANSF and perform monthly assessments. Once ITAG officials determine that the ANSF maintenance personnel are capable of maintaining those buildings and structures, ITAG and USACE will remove the buildings from the operations and maintenance contracts and transition them to ANSF control.

In October 2011, ITAG officials substantially revised their transition strategy, reducing both the number of ITAG personnel they planned to receive and the number of ANSF sites to place mentor teams. Specifically, the revised strategy anticipates that ITAG will receive only 141 personnel by the end of 2012, a reduction of 81 personnel. In addition, the revised strategy states that mentor teams will be placed at only 58 of the 115 sites originally planned, an almost 50 percent reduction in the original number of training sites. ITAG officials stated that the reduction in sites was based on multiple factors, to include the number of planned buildings not yet built or remote sites that did not have coalition forces present or adequate security measures in place. For those sites, ITAG officials stated that the ANSF would most likely have to train their own maintenance personnel or rely on mobile maintenance teams and contracted maintenance support. As of December 2011, the number of ITAG personnel had grown to 116 with an established mentor presence at 30 sites; however, only some of the buildings and structures have been transitioned to the ANSF.

⁷ A *tashkil* is an authoritative Afghan document that lists by the Afghan solar calendar year the units' authorized personnel and equipment.

As of December 2011, the number of ITAG personnel had grown to 116 with an established mentor presence at 30 sites; however, only some of the buildings and structures have been transitioned to the ANSF.

The increase of ITAG staffing to the number of personnel needed by the end of 2012 is imperative to successfully implementing the revised transition strategy, enabling them to staff and deploy the remaining mentor teams at additional sites by 2013. *To increase assurance that CSTC-A will meet its 2014 year-end transition goal, CSTC-A ITAG and USACE officials should accelerate training implementation at sites that have ITAG mentors. In*

addition, CSTC-A ITAG should expeditiously staff and deploy mentors to the remaining ANSF sites as specified in the most current version of the ITAG Campaign Plan.

Afghan National Security Forces Personnel Authorized and Available for Training

An ITAG official stated that before ITT could initiate training at ANSF sites, ITAG and USACE had to overcome the challenge of ANSF Commanders' reluctance to allow maintenance personnel to participate in the training program. ITAG officials stated that ANSF Commanders indicated that they needed these personnel to sustain the buildings and structures not maintained under the operations and maintenance contracts.⁸ At the six ANSF sites we visited that had implemented training as of July 2011,⁹ the *tashkil* authorized approximately 300 maintenance personnel, of which approximately 110 personnel were enrolled in the training program. In addition, some ANSF Commanders stated that they would release less than half of the enrolled personnel to attend training each day.

To increase the number of maintenance personnel allowed to participate in training, CSTC-A officials began working with Ministry of Defense officials to draft a directive recognizing the Chief, Construction and Property Maintenance Directorate, as the official authority to direct facilities maintenance for the Afghan National Army throughout Afghanistan. The directive also directs the Chief, Construction and Property Maintenance Directorate, to provide training for the facilities maintenance personnel. The Minister of Defense signed the directive on December 28, 2011. *CSTC-A officials should communicate to the Ministry of Defense the need to expedite the directive's implementation to ensure that maintenance personnel are allowed to participate in vocational training.*

The ANSF *tashkil* for solar year 1389 did not authorize sufficient personnel to operate and maintain the facilities provided for under the contracts in addition to their current maintenance responsibilities.¹⁰ As part of their transition strategy, CSTC-A officials

⁸ The contracts provide operations and maintenance services for USACE- or Air Force Center for Engineering and the Environment (AFCEE) -constructed buildings and structures.

⁹ The six sites do not include the vocational school.

¹⁰ Solar year 1389 is March 21, 2010, through March 20, 2011.

began coordinating with the Afghan Ministry of Defense and Ministry of Interior to increase the number of authorized maintenance positions on their *tashkils*. With CSTC-A's assistance, the Ministry of Defense approved and began implementing changes to *tashkil* 1390, which increased the number of authorized maintenance personnel at some sites from 24 to either 65 or 80 personnel, depending on the unit size and location. A CSTC-A official stated that the *tashkil* increases should be sufficient to maintain the current and future Ministry of Defense infrastructure when supplemented with Afghan-led maintenance contracts for technical facility systems, such as wastewater treatment plants and major electrical systems.

Although ITAG officials collaborated with the Ministry of Interior to increase the number of authorized maintenance positions on their *tashkil*, those changes are not expected to be approved and implemented until sometime in 2012. Specifically, the Ministry of Interior issued a facilities maintenance concept plan for solar year 1391, which should increase the number of maintenance personnel in solar years 1391 and 1392 to sustain the existing and future facilities throughout Afghanistan. *CSTC-A officials should continue to work with Ministry of Interior officials to ensure that their future tashkils authorize a sufficient number of maintenance personnel and that the maintenance personnel are allowed to participate in vocational training.*

Recruitment and Retention of Afghan National Security Forces Maintenance Personnel

ITAG officials stated that the ANSF had difficulty recruiting and retaining maintenance personnel due to low pay and competency. For example, an ITAG official stated that skilled maintenance personnel could usually earn a higher wage in the private sector. In addition, most ANSF maintenance personnel are illiterate and unskilled in the vocational

Figure 2. Electrical Training at Kabul Military Training Center



trades needed for facilities maintenance. An ITAG official further stated that to assist ANSF in recruiting and retention efforts, CSTC-A personnel worked with the Afghan Ministry of Defense to increase *tashkil* 1390 pay levels for maintenance personnel. Furthermore, CSTC-A officials stated that they collaborated with Ministry of Defense officials to draft a hiring policy for facility maintenance personnel to increase assurance that qualified personnel are selected. The draft policy includes giving hiring priority to those contractor employees already working at the site, filling senior positions with individuals that have professional degrees, and hiring maintenance personnel graduating from ANSF vocational and local trade schools who have passed qualification tests. However, as of December 22, 2011, the Minister of Defense had not signed the new hiring policy.

CSTC-A officials should continue to monitor the status of the Ministry of Defense hiring policy and communicate to Ministry officials the need to expedite implementation of the policy. CSTC-A officials should also work with the Ministry of Interior to develop a comparable hiring policy and strategies. The establishment and implementation of

Ministry of Defense and Ministry of Interior hiring policies will increase assurance that qualified maintenance personnel are recruited and retained.

Other Initiatives Not Yet Fully Implemented

According to a CSTC-A official, the training initiatives were not expected to provide a sufficient number of capable maintenance personnel necessary to maintain all ANSF facilities by the end of 2014. Instead, the April 2011 ITAG Campaign Plan outlined other initiatives that, if implemented, could further assist the ANSF in assuming full control of its facility sustainment. Other initiatives included:

- developing an Afghan-managed operations and maintenance contract,
- recruiting graduates from commercial vocational trade schools and subsidizing pay, and
- transitioning contractor personnel to ANSF positions.

CSTC-A officials stated that Ministry of Defense officials had begun taking action to implement some of these initiatives, such as recruiting graduates of local commercial trade schools and collaborating with the Chief, Construction and Property Maintenance Directorate, to develop an Afghan-managed operations and maintenance contract for one facility. ITAG's Campaign Plan contained no changes to the remaining initiatives between April and December 2011. *CSTC-A and USACE officials should expedite full implementation of the initiatives identified in the ITAG Campaign Plan and develop new initiatives to accelerate the development of ANSF infrastructure maintenance capabilities.*

Performance Standards and Quality Assurance Activities Are Needed to Assess the Contractor's Performance

USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities. Specifically, USACE did not incorporate adequate measurable performance standards in any of the sections of the operations and maintenance contracts sufficient to assess the quality of vocational training and the ability of ANSF personnel to assume responsibility for operations and maintenance services. In addition, the monthly COR reports did not evaluate the quality of the contractor's vocational training efforts.

Performance Standards

USACE contract officials awarded the operations and maintenance contracts without adequate measurable performance standards. The Federal Acquisition Regulation (FAR) Part 37, "Service Contracting," states that when issuing a performance-based contract for services, the contract must include a performance work statement and measurable performance standards to ensure the contractor's performance meets contract requirements. It also states that those performance standards must be measurable and

structured to permit the Government's assessment of the contractor's performance. According to the contracts, the performance standards would be identified in the performance work statement and the quality assurance surveillance plan (QASP) would describe the systematic methods contract officials would use to measure performance and provide a means for evaluating whether the contractor is meeting the performance standards identified in the performance work statement.

Neither contract had measurable performance standards in the performance work statement, which the COR could use to assess whether the contractor was properly performing the vocational training required by the contracts. For example, the performance work statement required the contractor to provide carpentry and plumbing training to ANSF. However, the contracts did not include performance standards to describe the skill level or type of carpenter or plumber required.¹¹ In addition, the contracts did not state that the students must complete a specified-length training program enabling them to perform basic tasks with minimal assistance and pass a skills test with a minimum test score to prove competency in tasks, such as framing walls, building stairs, or repairing pipes.

The QASP did contain five performance standards. However, these performance standards were not sufficient to assess whether the contractor was conducting sufficient vocational training for the ANSF to assume responsibility of all operations and maintenance activities. For example, one performance standard directed the COR to calculate the number of students that had initiated vocational training and the number of students that graduated from training. Calculating the graduation rates may be useful for determining how many students completed training, but that measure was not adequate for determining whether the quality of vocational training provided was sufficient for ANSF personnel. Another example of a performance standard that did not effectively evaluate contractor performance included a requirement to create a train-the-trainer program that resulted in at least five Afghan trainers per year. Instituting a train-the-trainer program may be measurable, but it did not enable the COR to evaluate the quality of the contractor's vocational training efforts.

In September 2011, USACE officials approved the contractor's training plan for contract W912ER-10-D-0002. The contractor's training plan identified the tasks students must be taught to achieve their *tashkil*-designated classification level (apprentice, journeyman, or craftsman) in each facility maintenance trade and stated that training will continue until the students demonstrate the required proficiency for their classification level. Although the contractor's training plan was a deliverable under the contract, according to the FAR, the Government is still required to develop performance standards to measure contractor performance to include the quality level that USACE contract officials expect the contractor to achieve. However, USACE officials at the time of our review still had not

¹¹A performance standard for a vocational skill level could be an apprentice, journeyman, or craftsman. A vocation type for a carpenter could be a finish carpenter, cabinetmaker, or framer. A vocation type for a plumber could be pipefitter, pipelayer, or steamfitter.

updated the contracts with measurable performance standards to determine whether the contractor's performance in training ANSF students to their *tashkil*-designated classification level is acceptable.

As of December 2011, USACE contract officials had not approved the contractor's training plan for contract W912ER-10-D-0003. *To assess whether ANSF personnel completing vocational training are capable of maintaining their own infrastructure, USACE should update the contracts to incorporate measurable performance standards and the quality level the Government expects the contractor to provide.*

Monthly Contracting Officer's Representative Reports

The monthly COR reports did not evaluate the quality of the contractor's vocational training efforts. Using a COR report template, USACE officials complete COR reports on a monthly basis that are designed to document the inspection and evaluation of the contractor's performance for conducting operations and maintenance services. However, the monthly COR report template did not include a requirement to evaluate the quality of the contractor's vocational training efforts or whether the ANSF trainees were making progress in their ability to perform operations and maintenance tasks independently. FAR Part 46, "Quality Assurance," states that Government contract quality assurance will be performed when necessary to determine whether services meet contract requirements. It also states that the contract administration office must maintain suitable records reflecting the nature of Government contract quality assurance actions and decisions regarding the acceptability of processes and requirements. Although the COR report template did not include vocational training, both AED-S and AED-N officials stated that they performed limited quality assurance activities in an attempt to monitor contractor performance.

After USACE contract officials update the contracts, they should update the monthly COR report template to verify that the contractor is adequately conducting vocational training that will enable ANSF to perform their own operations and maintenance.

Afghanistan Engineering District-South

The May through August 2011 COR reports did not address vocational training. However, in September 2011, an AED-S official directed the CORs to begin reviewing the contractor's vocational training efforts as part of their performance monitoring and to document the review accordingly. A revised monthly report template contained four training questions; however, the questions were limited to identifying the number of students enrolled in vocational training, their progress, and disposition. An AED-S official stated that he plans to revise the monthly report template again to better assess the contractor's vocational training performance.

Although the COR report template did not include an assessment of the contractor's vocational training efforts before September 2011, an AED-S official stated that she performed limited quality assurance activities, including reviewing weekly contractor training reports and conducting meetings with ITAG mentors. Specifically, the

contractor's weekly training reports contained student attendance averages, pretest averages, contractor comments, and pictures of students. The AED-S official also stated that she met with ITAG officials to discuss contractor vocational training at each ANSF site. However, the official did not document her analysis or conclusions based on the contractor's weekly training reports or the meetings with ITAG. Although reviewing the weekly contractor training reports and conducting meetings with ITAG are an important component of quality assurance, AED-S officials should document those reviews to reflect the nature of their quality assurance actions. Further, AED-S officials should supplement those reviews with other quality assurance activities to assess objectively the performance and success of the vocational training being provided to ANSF personnel.

Afghanistan Engineering District-North

The July and November 2011¹² COR reports addressed vocational training; however, the reports did not address the quality of the training. Although the COR reported on the contractor's training performance and met with both ITAG and contractor officials, the COR could not objectively measure whether the contractor's performance was acceptable because the contracts did not identify measurable performance standards to assess contractor performance.

Additional Emphasis Needed for Vocational Training

USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities because USACE considered the vocational training portion of the contracts to be negligible in relation to the value of operations and maintenance services to be performed. Specifically, USACE officials did not consider the vocational training requirements a high priority because the primary

USACE officials did not consider the vocational training requirements a high priority.

focus of the contracts was to provide operations and maintenance services. Officials stated that the majority of the work included the operation, maintenance, repair, and minor construction of ANSF sites. For example, the contracting officer

stated that the training portion of the contract was only 3 percent of the contract value (or approximately \$8 million of \$275 million for the base year and first option year).

Although vocational training may be negligible in dollars, developing the ANSF infrastructure maintenance capabilities is imperative to enable ANSF forces to sustain their infrastructure. Therefore, USACE officials should have emphasized the value and importance of the contractor's compliance with the vocational training requirements in the contracts and included measurable performance standards in the performance work statement. They also should have included performance measures in the quality assurance surveillance plan and fully developed monthly COR report templates to assess the quality of the contractor-provided training.

¹² Earlier COR reports were not available because the COR, who redeployed in July 2011, did not maintain records reflecting the nature of Government contract quality assurance activities.

Conclusion

Until ITAG, USACE, and ANSF officials take the necessary actions to accelerate the quality and quantity of vocational training efforts and fully implement other facility sustainment initiatives, CSTC-A will continue to be at an increased risk of not meeting its goal to transition operations and maintenance responsibilities to the ANSF by the end of 2014. Without this emphasis, the approximately \$10.3 billion planned U.S investment in facilities through 2012 may also be diminished if ANSF are unable to maintain their infrastructure.

U.S. Army Corps of Engineers Management Comments on the Finding and Our Response

The USACE Chief, Security Assistance Branch, Directorate of Military Programs, disagreed with the finding that vocational training provided under the contracts did not effectively develop the Afghan National Security Forces' infrastructure maintenance capabilities. The Chief stated that the training portion of the contracts is just one factor in the effort to develop the infrastructure maintenance capabilities of the ANSF. The Chief continued that the overall effort would depend on multiple factors outside of the scope of these contracts including manning, funding, authority, supplies and equipment being provided for the ANSF.

The USACE Chief, Security Assistance Branch, Directorate of Military Programs, also disagreed with the statement that USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities because officials considered the vocational training portion of the contracts to be negligible in relation to the value of operations and maintenance services. The Chief stated that this is not an accurate statement. He stated that the audit was performed while the training program was in its infancy and now that on-the-job training has been in place for a while, USACE is in a position to provide measurable performance standards to the contractor.

Our Response

We agree that the training portion of the contracts is just one factor in the effort to develop the infrastructure capabilities of the ANSF. Since April 2011, the ITAG Campaign Plan outlined other initiatives that, if implemented, could further assist the ANSF in assuming full control of its facility sustainment. However, the other initiatives do not negate the contract requirements to implement vocational training at the ANSF sites and to ensure that the ANSF is receiving the training expected as part of established performance standards. CSTC-A and USACE need to make every effort to decrease the risk that CSTC-A will not meet its goal of transitioning operations and maintenance responsibilities to the ANSF by the end of 2014.

In addition, even though the training program was in its infancy, the FAR requires measurable performance standards and the method of assessing these standards (outlined in the QASP) as part of the contract. These elements were still missing from the contracts, as of March 2012, despite the training being in place for over a year.

U.S. Army Corps of Engineers Management Comments on the Finding Discussion and Our Response

The USACE Chief, Security Assistance Branch, Directorate of Military Programs, stated that, as indicated in the report, USACE implemented changes in the surveillance program (Monthly Contracting Officer's Representative Reports section) following the final approval of the Contractors Training Plan. The Chief stated that these improvements included:

- The monthly contracting officer's representative reports will now include assessments for training.
- Contracting officer's representatives have been appointed by the contracting officer to oversee the training/transition program. Oversight will include the following:
 - a. conducting weekly/biweekly meetings with the Contractor, CORs, ITAG and other parties involved in the program;
 - b. coordinating input from ITAG mentors that are at the training sites;
 - c. reviewing the Contractor's progress and performance to the Training Plan; and
 - d. conducting field reviews of the program.
- Performance metrics based on the approved Training Plan will be incorporated in the Quality Assurance Surveillance Plans.

Our Response

The changes in the surveillance program in addition to updating the Quality Assurance Plans and the monthly contracting officer's representatives reports as discussed in Recommendations 3 and 4, will help to assess the quality of vocational training and the ability of ANSF personnel to assume responsibility for operations and maintenance services.

Revised and Deleted Recommendations

Based on comments from the USACE Chief, Security Assistance Branch, Directorate of Military Programs, we updated the finding discussion in the section Performance Standards and Quality Assurance Activities Are Needed to Assess the Contractor's Performance. Specifically, we agreed that while the Federal Acquisition Regulation requires the inclusion of measurable performance standards and a method of accessing the contractor's performance against those measurable performance standards in the contract, the measurable performance standards do not necessarily have to be included in the Performance Work Statement. As a result, we revised Recommendation 3, deleted Recommendation 4.a, and renumbered Recommendation 4.b as Recommendation 4.

Recommendations, Management Comments, and Our Response

1. We recommend that the Commander, Combined Security Transition Command-Afghanistan, in coordination with the Commander, U.S. Army Corps of Engineers, Transatlantic Division, accelerate training implementation at Afghan National Security Forces sites with an Infrastructure Training Advisory Group mentor presence.

Combined Security Transition Command-Afghanistan Comments

The Interim Director, CSTC-A Combined-Joint Engineering Directorate, responding on behalf of the Commander, Combined Security Transition Command-Afghanistan, agreed and stated that CSTC-A is interested in accelerating training; however, “insufficient hiring of trainees has been a key limitation.”

Our Response

Although the Interim Director, CSTC-A Combined-Joint Engineering Directorate, agreed, the comments were partially responsive in that they stated that they were interested in accelerating training. The recommendation is to accelerate training implementation at Afghanistan National Security Forces sites with an Infrastructure Training Advisory Group mentor presence. As of December 2011, 30 sites had a mentor presence but only 17 sites had begun training. We request that the Commander, Combined Security Transition Command-Afghanistan, provide additional comments by July 3, 2012, detailing the specific steps that they intend to take to accelerate training, and in particular, when training will be implemented at the remaining Afghan National Security Forces sites with a mentor presence.

2. We recommend that the Commander, Combined Security Transition Command-Afghanistan, accelerate efforts to:

a. Expeditionously staff and deploy Infrastructure Training and Advisory Group mentors to the remaining Afghan National Security Forces sites to correspond with staffing levels in the most recent version of the Infrastructure Training and Advisory Group Campaign Plan.

b. Communicate to the Afghan Ministry of Defense the need to expedite implementing the directive assigning direct authority over maintenance personnel to the Chief, Construction and Property Management Directorate.

c. Communicate to the Afghan Ministry of Interior the need to increase the number of maintenance personnel on the solar years 1391 and 1392 *tashkils* to maintain the existing and future infrastructure and enroll a sufficient number of maintenance personnel in vocational training.

d. Monitor the status of the Afghan Ministry of Defense draft hiring policy and communicate to the Ministry the need to expedite implementation of the policy.

e. Collaborate with the Afghan Ministry of Interior to develop a hiring policy comparable to the Ministry of Defense policy and to implement additional strategies that enable the Ministry to increase assurance that qualified maintenance personnel are recruited and retained.

Combined Security Transition Command-Afghanistan Comments

The Interim Director, CSTC-A Combined-Joint Engineering Directorate, responding on behalf of the Commander, Combined Security Transition Command-Afghanistan, agreed with Recommendations 2.a thru 2.e. In addition, for Recommendation 2.a the Interim Director, CSTC-A Combined-Joint Engineering Directorate, stated that staffing of CSTC-A is being pursued as aggressively as possible. Also, for Recommendation 2.e the Interim Director commented that there appears to be a reluctance on the part of the Afghan National Police to hire civilians to fill critical facilities maintenance positions, which is negatively impacting their ability to take on responsibility for facility maintenance.

Our Response

Comments from the Interim Director, CSTC-A Combined-Joint Engineering Directorate, were responsive. We require no additional comments.

f. Execute existing Campaign Plan initiatives and develop new initiatives to accelerate the development of Afghan National Security Forces maintenance capabilities by the end of 2014.

Combined Security Transition Command-Afghanistan Comments

The Interim Director, CSTC-A Combined-Joint Engineering Directorate, responding on behalf of the Commander, Combined Security Transition Command-Afghanistan, agreed with the recommendation.

Our Response

Comments from the Interim Director, CSTC-A Combined-Joint Engineering Directorate, were partially responsive. The response to the recommendation did not identify a timeline when CSTC-A plans to execute the existing Campaign Plan initiatives and finalize the development of new initiatives to accelerate the development of Afghan National Security Forces maintenance capabilities as requested in the draft report. We request that the Commander, Combined Security Transition Command-Afghanistan, provide additional comments by July 3, 2012, detailing the timelines for the Campaign Plan initiatives and the new initiatives.

3. We recommend that the Commander, U.S. Army Corps of Engineers, Transatlantic Division, in coordination with Combined Security Transition Command-Afghanistan, to update contracts W912ER-10-D-0002 and W912ER-10-D-0003 to include measurable performance standards. The contracts should describe the vocational training requirements in terms of measurable performance standards including the quality level the Government expects the contractor to provide to ensure the contractor's performance meets contract requirements.

U.S. Army Corps of Engineers Comments

The USACE Chief, Security Assistance Branch, Directorate of Military Programs, responding on behalf of the Commander, U.S. Army Corps of Engineers, Transatlantic Division, agreed and stated that all recommendations made by the DoD OIG will be considered in developing the performance work statements for the follow-on contract. The Chief stated that for the current contracts, the performance standards will be included in the QASP, which will be incorporated into both contracts through a modification. He stated that the QASP for both contracts are in the process of being updated with an estimated implementation date of April 30, 2012.

Our Response

Comments from the USACE Chief, Security Assistance Branch, Directorate of Military Programs, were responsive. USACE updated the QASP for contract W912ER-10-D-0002 on June 7, 2012. The expected implementation date for contract W912ER-10-D-0003 is now July 1, 2012. We require no additional comments.

4. We recommend that the Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-South, and Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-North, in coordination with Combined Security Transition Command-Afghanistan to revise the monthly contracting officer's representatives report templates to verify that the contractor is adequately conducting vocational training that will enable the Afghan National Security Forces to perform their own operations and maintenance.

U.S. Army Corps of Engineers Comments

The USACE Chief, Security Assistance Branch, Directorate of Military Programs, responding on behalf of the Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District South, and Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-North, agreed and stated the monthly contracting officer representatives report templates for both contracts are in the process of being updated with an estimated implementation date of April 30, 2012.

Our Response

Comments from the USACE Chief, Security Assistance Branch, Directorate of Military Programs, were responsive. On June 13, 2012, USACE provided a new estimated completion date of August 1, 2012. We require no additional comments.

Appendix. Scope and Methodology

We conducted this performance audit in Afghanistan from January 2011 to February 2012 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We determined whether vocational training provided under the contracts to conduct operations and maintenance services for the ANSF was effective in developing the infrastructure maintenance capabilities of the ANSF. We visited seven of nine ANSF sites in northern and southern Afghanistan where ITT had implemented vocational training as of July 2011 to observe training in progress: Construction and Property Management Department Facility Engineer Vocational and Technical Training School, Camp Sayar, Camp Hero, Camp Darulaman, Kabul Military Training Center, Camp Commando, and the National Military Hospital. We selected those sites based on NTM-A/CSTC-A's report that those sites would have measurable vocational training progress in 2011. During those site visits, we interviewed ITAG, USACE, ITT, and sub-contractor personnel to determine whether vocational training was implemented in compliance with contract requirements.

We reviewed Federal, DoD, and Army contracting guidance. Specifically, we reviewed Federal Acquisition Regulation Parts 37, "Services Contracting" and 46, "Quality Assurance;" Defense Federal Acquisition Regulation Supplement 246, and Army Regulation 70-1, "Management and Oversight of Service Acquisitions." In addition, we reviewed contract documentation dated from July 2010 to November 2011, including contracts and contract modifications for W912ER-10-D-0002 and W912ER-10-D-0003, COR designation letters, and quality assurance surveillance plans. We reviewed 7 months of COR reports, May through November 2011, to evaluate the quality of the contractor's vocational training efforts. Further, we reviewed transition documents, such as ITAG's Campaign Plan and Transition Matrix. We interviewed appropriate officials from USACE AED-N and AED-S, Combined Joint Engineers, and ITAG to gain an understanding of the vocational training requirements in the contracts. We interviewed USACE AED-N and AED-S contract officials about contract administration and their methodology for assessing contractor performance.

Use of Computer-Processed Data

We obtained contracts and contract modifications from the Electronic Document Access website. Electronic Document Access is a web-based system that provides secure on-line access, storage, and retrieval of contracts and contract modifications to authorized users throughout the DoD. We did not assess the reliability of the system; however, not assessing the reliability of the system did not materially affect the results of the audit because we did not rely on the data to support our findings, conclusions, or recommendations.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO), the DoD Inspector General (DoD IG), and the Special Inspector General for Afghanistan Reconstruction (SIGAR) have issued seven reports related to operations and maintenance, training, and contract oversight in Afghanistan. Unrestricted GAO reports can be accessed at <http://www.gao.gov/>. Unrestricted DoD IG reports can be accessed at <http://www.dodig.mil/audit/reports>. Unrestricted SIGAR reports can be accessed at <http://www.sigar.mil/>.

GAO

GAO Report No. 09-476T, “Iraq and Afghanistan: Security, Economic, and Governance Challenges to Rebuilding Efforts Should Be Addressed in U.S. Strategies,” March 25, 2009

DoD IG

DoD IG Report No. D2010-059, “U.S. Department of Defense, Office of Inspector General, Contingency Contracting: A Framework for Reform,” May 14, 2010

DoD IG Report No. SPO-2009-007, “Report on the Assessment of U.S. and Coalition Plans to Train, Equip, and Field the Afghan National Security Forces,” September 30, 2009

SIGAR

SIGAR Audit 11-6, “Inadequate Planning for ANSF Increases Risks for \$11.4 Billion Program,” January 26, 2011

SIGAR Audit 10-14, “ANA Garrison at Farah Appeared Well Built Overall but Some Construction Issues Should Be Addressed,” July 30, 2010

SIGAR Audit 10-12, “ANP Compound at Kandahar Generally Met Contract Terms but Has Project Planning, Oversight, and Sustainability Issues,” July 22, 2010

SIGAR Audit 10-11, “Actions Needed to Improve the Reliability of Afghan Security Force Assessments,” June 29, 2010

Combined Security Transition Command-Afghanistan Comments



HEADQUARTERS
NATO TRAINING MISSION AFGHANISTAN
COMBINED SECURITY TRANSITION COMMAND AFGHANISTAN
KABUL, AFGHANISTAN
APO, AE 09356

NTM-A/CSTC-A/CJ Eng

15 March 2012

MEMORANDUM THRU

United States Forces - Afghanistan (CJIG), APO AE 09356
United States Central Command (CCIG), MacDill AFB, FL 33621

FOR Office of the Department of Defense Inspector General, 4800 Mark Center Drive,
Alexandria, VA 22350-1500

SUBJECT: NTM-A/CSTC-A Response to the Draft Report "DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities" (DOD IG Project No. D2011-D000JO-0137.000)

1. Reference: Draft Report, dated 28 February 2012, Department of Defense Inspector General (DOD IG), subject as above.

2. The purpose of this memorandum is to respond and provide comments to the DOD IG draft report. NTM-A/CSTC-A Engineering concurs with all recommendations.

3. Point of contact for this action is [REDACTED]

LIGO.SAMUEL.MC
KAY. [REDACTED]

Samuel M. Ligo
COL, USA
NTM-A / CSTC-A, Engineering
Interim Director

Enclosure: NTM-A / CSTC-A Response to Recommendations

DRAFT REPORT
**“DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National
Security Forces Infrastructure Maintenance Capabilities”**
(Project No. D2011-D000JO-0137.000)

NTM-A/CSTC-A
RESPONSE TO RECOMMENDATIONS

Page 15, Section “Recommendations” the report states:

1. We recommend that the Commander, Combined Security Transition Command-Afghanistan, in coordination with the Commander, U.S. Army Corps of Engineers, Transatlantic Division, accelerate training implementation at Afghanistan National Security Forces sites with an Infrastructure Training Advisory Group mentor presence.

NTM-A/CSTC-A Response:

Concur with comments. NTM-A/CSTC-A is very interested in accelerating training, however insufficient hiring of trainees has been a key limitation. It is not within the purview of NTM-A/CSTC-A to hire the Afghan workforce for GIRA. We make every effort to increase hiring through mentorship at the ministry level to help move hiring packages through their process.

2. We recommend that the Commander, Combined Security Transition Command-Afghanistan, accelerate efforts to:

- a. Expeditiously staff and deploy Infrastructure Training and Advisory Group mentors to the remaining Afghan National Security Forces sites to correspond with staffing levels in the most recent version of the Infrastructure Training and Advisory Group Campaign Plan.

NTM-A/CSTC-A Response:

Concur with comments. The staffing of ITAG mentors is being pursued as aggressively as possible, but future manning shortfalls due to an overall drawdown of forces in Afghanistan is a risk to achieving staffing levels outlined in the Campaign Plan.

- b. Communicate to the Afghan Ministry of Defense the need to expedite implementing the directive assigning direct authority over maintenance personnel to the Chief, Construction and Property Management Directorate.

NTM-A/CSTC-A Response:

Concur.

- c. Communicate to the Afghan Ministry of Interior the need to increase the number of maintenance personnel on the solar years 1391 and 1392 *tashkils* to maintain the existing and future infrastructure and enroll a sufficient number of maintenance personnel in vocational training.

DRAFT REPORT
**“DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National
Security Forces Infrastructure Maintenance Capabilities”**
(Project No. D2011-D000JO-0137.000)

NTM-A/CSTC-A
RESPONSE TO RECOMMENDATIONS

NTM-A/CSTC-A Response:

Concur.

- d. Monitor the status of the Afghan Ministry of Defense draft hiring policy and communicate to the Ministry the need to expedite implementation of the policy.

NTM-A/CSTC-A Response:

Concur.

- e. Collaborate with the Afghan Ministry of Interior to develop a hiring policy comparable to the Ministry of Defense policy and to implement additional strategies that enable the Ministry to increase assurance that qualified maintenance personnel are recruited and retained.

NTM-A/CSTC-A Response:

Concur with comments. Unlike the Afghan National Army funding situation, funds from the Law and Order Trust Fund for Afghanistan (LOTFA) finance a maximum of 57,000 police personnel per the tashkil. GIRoA is wholly responsible for paying all civilian salaries. Consequently, there appears to be an organized reluctance on the part of the Afghan National Police (ANP) to hire civilians to fill critical facilities maintenance positions. Therefore, police are typically used to perform facilities maintenance tasks. We understand that civilian pay disparity is only an issue if comparing the base pay between police and civilian positions. In fact, when special/incentive pay is added to base pay, the compensation of civilians and police is comparable. Therefore, we surmise that the ANP is consciously not hiring civilians, negatively impacting their ability to take on responsibility for facility maintenance.

DRAFT REPORT
**“DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National
Security Forces Infrastructure Maintenance Capabilities”**
(Project No. D2011-D000JO-0137.000)

NTM-A/CSTC-A
RESPONSE TO RECOMMENDATIONS

f. Execute existing Campaign Plan initiatives and develop new initiatives to accelerate the development of Afghan National Security Forces maintenance capabilities by the end of 2014.

NTM-A/CSTC-A Response:

Concur.

APPROVED BY:

Samuel M. Ligo
COL, Engineer
Interim Director

PREPARED BY:

██████████
Capt, Engineering Integration
DSN ██████████

U.S. Army Corps of Engineers Comments



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
WASHINGTON, D.C. 20314-1000

CEIR

23 March 2012

MEMORANDUM FOR Department of Defense Inspector General, 4800 Mark Center Drive, Alexandria, VA 22350

SUBJECT: OIG Draft Report DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities (Project D2011-D000JO-0137.000)

1. DODIG requested USACE provide additional comments on Recommendations 3, and 4a-b as addressed in the subject report.
2. HQs U.S. Army Corps of Engineers additional comments are enclosed as well as comments to the recommendations. These comments were approved by the Chief, Security Assistance Branch, Directorate of Military Programs.
3. If you have further questions regarding this matter, please contact the undersigned at [REDACTED] or via email at [REDACTED].

Encl





DEPARTMENT OF THE ARMY
U.S. Army Corps of Engineers
441 G Street, NW
Washington DC 20314-1000

REPLY TO
ATTENTION OF:

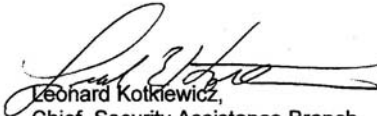
CEMP-TAD

MEMORANDUM FOR Department of Defense Inspector General (DODIG)

SUBJECT: U.S. Army Corps of Engineers (USACE) Response to DODIG Draft Report
"DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities".

1. The U.S. Army Corps of Engineers (USACE) welcomes the opportunity to review the draft report.
2. USACE does not concur with the finding that the vocational training provided under the contracts did not effectively develop the Afghan National Security Forces' (ANSF) infrastructure maintenance capabilities. The training portion of these contracts is just one factor in the effort to develop these capabilities. As indicated in the report, the overall effort will depend on multiple factors outside the scope of these contracts including adequate manning, funding, authority, supplies and equipment being provided for the ANSF. Additionally, the audit field work was undertaken during the early stages of the training program.
3. USACE appreciates the report's recommendations and their implementation will assist in improving the training outcomes of the contracts. Specific responses to the applicable recommendations and additional comments are provided in the enclosures.
4. My point of contact for these comments is [REDACTED]

Enclosures


Leonard Kotkiewicz,
Chief, Security Assistance Branch,
Directorate of Military Programs

ENCLOSURE 1

U.S. Army Corps of Engineers Response to Draft DODIG Report "DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities"

GENERAL COMMENTS

As indicated in the draft report, changes in the surveillance program were implemented early September 2011 with continuing adjustments incorporated following the final approval of the Contractor's Training plan. Most notable are the following improvements in the surveillance:

1. The monthly Contracting Officer Representative (COR) reports are being amended to include assessments for training.
2. Primary CORs have been appointed by the Contracting Officer to oversee the training/transition program, that include the following:
 - a. Conducting weekly/bi-weekly meetings and also teleconferences with the Contractor, CORs, ITAG and other parties involved with the program
 - b. Coordinating input from ITAG mentors located at training sites.
 - c. Reviewing the Contractor's progress and performance to the Training Plan
 - d. Conducting field reviews of the program.
3. Performance metrics based on the approved Training Plan will be incorporated in the Quality Assurance Surveillance Plans (QASP).

Page i and 4. "In addition, USACE officials did not incorporate measurable performance standards in the contracts or conduct sufficient quality assurance activities because officials considered the vocational training portion of the contracts to be negligible in relation to the value of operations and maintenance services to be performed."

Comment: This is not an accurate statement. The DoDIG performed its audit while the training program was in its infancy. Now that the On-the-Job Training (OJT) program has been in place for some time, USACE is in a position to provide measurable performance standards to the contractor based on the conditions on the ground in Afghanistan. It is important to note that the OJT program contained in both contracts was intended to provide limited OJT to a small number of ANSF personnel.

Page 3, paragraph entitled "U.S. Army Corps of Engineers Contract Management and Oversight", last sentence.

Revised

Comment: Please update this section to reflect that as of 31 December 2011, there was one appointed COR in both TAN and TAS (two CORs in total) for oversight of the training portion of both contracts.

ENCLOSURE 2

**U.S. Army Corps of Engineers
Response to Draft DODIG Report "DoD Needs to Improve Vocational Training
Efforts to Develop the Afghan National Security Forces Infrastructure
Maintenance Capabilities"**

RECOMMENDATIONS

Recommendation 3: We recommend that the Commander, U.S. Army Corps of Engineers, Transatlantic Division, in coordination with Combined Security Transition Command-Afghanistan, update the performance work statements of contracts W912ER-10-D-0002 and W912ER-10-D-0003. The performance work statements should describe the vocational training requirements in terms of measurable performance standards including the quality level the Government expects the contractor to provide to ensure the contractor's performance meets contract requirements.

Revised

Response: Concur with Comment. On 1 January 2012, TAM began the re-compete effort for the ANSF O&M North contract. All recommendations made by the DoDIG will be considered while developing the Performance Work Statement (PWS) for the follow-on contract. USACE does not concur with PWS revisions to the current contracts to include measurable performance standards. FAR Part 37-603(b) states that performance-based contracts for services shall include (1) a performance work statement; (2) measurable performance standards; and (3) performance incentives where appropriate. There is no requirement to include the performance standards in the PWS. Updated performance standards will be included in the Quality Assurance Surveillance Plan (QASP), which will be incorporated into both contracts via modification. This will enable the assessment of work performance against the measurable performance standards contained in the QASP.

Recommendation 4: We recommend that the Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-South, and Commander, U.S. Army Corps of Engineers, Afghanistan Engineering District-North, in coordination with Combined Security Transition Command-Afghanistan, to:

a. Update the quality assurance surveillance plan to include performance measures to evaluate whether the quality of vocational training was sufficient for Afghan National Security Forces personnel to maintain the existing infrastructure.

Deleted

Response: Concur. The Quality Assurance Surveillance Plans (QASPs) for both contracts are in the process of being updated. Estimated implementation date is 30 April 2012.

b. Revise the monthly contracting officer's representatives report templates to verify that the contractor is adequately conducting vocational training that will enable the Afghan National Security Forces to perform their own operations and maintenance.

Response. Concur. The monthly (COR) report templates for both contracts are in the process of being updated. Estimated implementation date is 30 April 2012.

Renumbered as
Recommendation 4



Inspector General Department of Defense