

# SIGAR

**Special Inspector General for  
Afghanistan Reconstruction**

**SIGAR 14-30 Audit Report**

Afghan National Security Forces: Despite Reported  
Successes, Concerns Remain about Literacy Program  
Results, Contract Oversight, Transition, and Sustainment



JANUARY  
2014

# SIGAR

## Special Inspector General for Afghanistan Reconstruction

### WHAT SIGAR REVIEWED

The North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A) considers literacy to be critical to developing capable, professional, and sustainable Afghan National Security Forces (ANSF). In 2009, the command established a goal of having 100 percent of ANSF personnel achieve Level 1 literacy (basic literacy equivalent to first-grade proficiency) and at least 50 percent of the ANSF attain Level 3 (functional literacy equivalent to third-grade proficiency) by December 31, 2014.

In an effort to achieve its program goals, the command implemented a literacy training program delivered through three U.S.-funded contracts with OT Training Solutions, Insight Group, and the Higher Education Institute of Karwan. Issued in August 2010, these contracts have a combined value of \$200 million for up to 5 years. NTM-A/CSTC-A plans to transfer the program to the Afghan Ministries of Defense and Interior by December 31, 2014.

The objectives of this audit were to assess the extent to which (1) NTM-A/CSTC-A's literacy training is meeting goals for improving literacy within the ANSF, (2) NTM-A/CSTC-A has provided effective contract oversight, and (3) NTM-A/CSTC-A has taken steps to transfer and sustain the training program.

JANUARY 2014

### Afghan National Security Forces: Despite Reported Successes, Concerns Remain about Literacy Training Program Results, Contract Oversight, Transition, and Sustainment

#### SIGAR 14-30 Audit Report

#### WHAT SIGAR FOUND

The North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A), under the command of the International Security Assistance Force, reported that its literacy training program has been generally successful in providing basic, functional literacy to Afghan National Security Forces (ANSF) personnel. As of October 2013, the command reported that 224,826 ANSF personnel had passed basic Level 1, with 73,700 passing Level 3 since the program's inception in November 2009. The command said that the literacy program will meet its goal of 100 percent of ANSF personnel proficient at Level 1 and 50 percent proficient at Level 3 by the end of 2014. However, these goals were based on the ANSF's authorized end strength of 148,000 personnel that was established in 2009, rather than the current authorized end strength of 352,000. Several NTM-A/CSTC-A officials told us they do not know how the goal for the literacy program was developed, but that attaining it based on the current authorized ANSF end strength may be "unrealistic" and "unattainable."

The command's ability to measure the effectiveness of its literacy training program and determine the extent to which overall literacy of the ANSF has improved is limited. None of the three literacy training contracts requires independent verification of testing for proficiency or identifies recruits in a way that permits accurate tracking as the recruits move on to army and police units. For example, the reporting does not link the names and military identification numbers of students listed on class rosters with course graduation rosters and their assigned units' personnel lists. The contracts also do not adequately define what constitutes a literacy class. The lack of defined requirements for classes and length of instruction resulted in one contractor billing for classes held for as little as 2 hours a month and for multiple classes at one site that could have been combined into one class. External factors also limit NTM-A/CSTC-A's ability to determine progress. For example, security pressures and the need to send recruits to the field more



Literacy instruction at Darulaman Literacy Center at Camp Julian

Source: SIGAR, March 24, 2013.

quickly has caused some army recruits to not complete the full 64 hours of instruction needed to achieve Level 1 literacy. From February to July 2013, the Ministry of Defense removed literacy training from the basic training program. Some ANP recruits also do not receive the required hours of literacy instruction, and according to officials, 45 percent of police personnel recruited between July 2012 and February 2013 were sent directly to field checkpoints without receiving any literacy training. Lastly, attrition, which NTM-A/CSTC-A estimates at 30 to 50 percent annually, makes it difficult for the command to measure program success. NTM-A/CSTC-A is working to address these issues by, among other things, developing class requirements and implementing a standard procedure for verifying the need for and approving new classes.

SIGAR also found that NTM-A/CSTCA initially did not perform effective oversight of the three ANSF literacy training contracts. Specifically, the command allowed the training program to grow far beyond its oversight capacity and was unable to monitor the contractors' performance at a majority of the training sites in accordance with the contract acquisition plan and quality assurance surveillance plan. For example, in December 2010, NTM-A/CSTC-A contracted with EUREKA Research to conduct site visits at 960 training locations to evaluate classes being conducted. By the fall of 2012, the number of training locations totaled approximately 3,200 with roughly 6,000 classes across Afghanistan.

NTM-A/CSTC-A has since taken steps to improve oversight. Namely, it reduced the number of ongoing classes to roughly 2,200 conducted in 589 locations as of August 2013. In addition, it awarded a new quality assurance contract in December 2013. Despite these improvements, NTM-A/CSTC-A's ability to oversee OT Training Solutions, Insight Group, the Higher Education Institute of Karwan, as well as the new quality assurance contractor, may be hampered as the drawdown of coalition forces continues because there will be fewer personnel available to conduct oversight.

NTM-A/CSTC-A's strategy and plan for the literacy training program called for the command to transfer the program to the Afghan government by the end of 2014, with all classes in the field transferred by July 2013. However, NTM-A/CSTC-A had difficulty obtaining agreement on the plan from the Ministries of Defense and Interior. In May 2013, the ministries agreed to NTM-A/CSTC-A's updated plans for the literacy training program, but have been slow to fulfill their stated commitments under the plans. In particular, they have been reluctant to increase the length of basic recruit training to allow for literacy training through Level 3 for illiterate recruits.

Despite the slow transfer of responsibilities to the Afghan government, other international donors have continued to support the ANSF literacy training effort. However, NTM-A/CSTC-A has not yet developed a new transition and sustainment strategy that defines these stakeholders' responsibilities and commitments, program goals, milestones, metrics, and timelines. Without such a strategy in place early in the transition process, the potential for delays and duplication of efforts exists, particularly if stakeholders do not implement commitments as planned or if they initiate separate efforts. The potential delays and duplication of efforts could result in wasted funds, limited effectiveness of the training program, and negatively affect its transfer to the Afghan government.



Basic Dari literacy training material at Kabul Military Training Center

Source: SIGAR, March 27, 2013.

## WHAT SIGAR RECOMMENDS

SIGAR is making six recommendations to the Commander of the International Security Assistance Force Joint Command, in coordination with other relevant entities: two to improve the usefulness of literacy training program reporting and measures of progress toward achieving overall program goals; three to strengthen the oversight of the three ongoing literacy training contracts and the new quality assurance contract; and one to increase the likelihood of a successful transfer and sustainment of the literacy training program by developing and implementing a formal, coordinated transition and sustainment strategy.

In commenting on a draft of this report, NTM-A, on behalf of the International Security Assistance Force Joint Command, concurred with three recommendations, partially concurred with two recommendations, and did not concur with one recommendation. The U.S. Central Command Joint Theater Support Contracting Command also provided written comments to the draft report in which it concurred with the five recommendations directed to it. These comments, along with our responses, are reproduced in appendices III and IV.



# SIGAR | Office of the Special Inspector General for Afghanistan Reconstruction

January 28, 2014

Department of Defense Offices and Commands:

This report discusses the results of SIGAR's audit of three Department of Defense contracts to provide literacy training to Afghan National Security Forces personnel throughout Afghanistan. It includes six recommendations for the Commander of the International Security Assistance Force Joint Command. These recommendations are intended to improve the usefulness of literacy training program reporting and measures of progress toward achieving overall program goals, strengthen oversight of the three ongoing literacy training contracts, and increase the likelihood of a successful transfer and sustainment of the literacy training program.

The North Atlantic Treaty Organization Training Mission-Afghanistan (NTM-A) provided comments on the draft of this report on behalf of the International Security Assistance Force Joint Command. In its response, NTM-A concurred with three recommendations, partially concurred with two recommendations, and did not concur with one recommendation. The U.S. Central Command Joint Theater Support Contracting Command also provided written comments on the draft report. The command concurred with the five recommendations addressed to it. These comments, along with our responses, are reproduced in appendices III and IV.

SIGAR conducted this work under the authority of Public Law No. 110-181, as amended; the Inspector General Act of 1978, as amended; and in accordance with generally accepted government auditing standards.

John F. Sopko  
Special Inspector General  
for Afghanistan Reconstruction



# SIGAR | Office of the Special Inspector General for Afghanistan Reconstruction

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Secretary of Defense

General Lloyd J. Austin III  
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General Joseph F. Dunford, Jr.  
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## ABBREVIATIONS

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ANA	Afghan National Army
ANP	Afghan National Police
ANSF	Afghan National Security Forces
CSTC-A	Combined Security Transition Command-Afghanistan
FAR	Federal Acquisition Regulation
GIZ	Deutsche Gesellschaft für International Zusammenarbeit
GSCC	General Support Contracting Command
HEIK	Higher Education Institute of Karwan
MOD	Ministry of Defense
MOI	Ministry of Interior
NTM-A	North Atlantic Treaty Organization Training Mission-Afghanistan
OTTS	OT Training Solutions

Devastated by decades of conflict and neglect, Afghanistan suffers from low levels of literacy among the general population and even more so among recruits in the Afghan National Security Forces (ANSF), which includes the Afghan National Army (ANA) and Afghan National Police (ANP).<sup>1</sup> The Afghan Ministry of Education estimates that only about one-third of the Afghan population can read or write, while approximately 13 percent of ANSF recruits possess these abilities. The North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A),<sup>2</sup> under the command of the International Security Assistance Force, considers literacy critical to developing a capable, professional, and sustainable ANSF. In NTM-A/CSTC-A's view, literate forces are easier to train, more capable and effective, and better able to understand human rights and the rule of law. Further, literate soldiers and police can account for equipment and weapons by completing paperwork and reading serial numbers. They can also mitigate corrupt practices by tracking their own pay.

In 2009, NTM-A/CSTC-A established a goal of having 100 percent of ANSF personnel attain Level 1 literacy (basic literacy equivalent to first-grade proficiency) and at least 50 percent of personnel attain Level 3 literacy (functional literacy equivalent to third-grade proficiency) by December 31, 2014.<sup>3</sup> To achieve this goal, NTM-A/CSTC-A implemented a literacy training program for the ANSF valued at \$200 million for up to 5 years. Issued in August 2010, the U.S.-funded contracts were with OT Training Solutions (OTTS), Insight Group, and the Higher Education Institute of Karwan (HEIK). NTM-A/CSTC-A plans to transfer the literacy training program to the Afghan government at the end of 2014.

The objectives of this audit were to assess the extent to which

1. NTM-A/CSTC-A's literacy training is meeting goals for improving literacy within the ANSF,
2. NTM-A/CSTC has provided effective contract oversight, and
3. NTM-A/CSTC-A has taken steps to transfer and sustain the training program.

To accomplish our objectives, we reviewed the three base literacy contracts and the associated program oversight contract for quality assurance, as well as modifications and task orders. We analyzed monthly contracting officer reports, coalition unit site inspection reports, and quality assurance reports. In addition, we reviewed acquisition strategies and other documents developed during the planning and pre-award phases of the contracts, along with relevant clauses in the Federal Acquisition Regulation (FAR) and U.S. Army contracting regulation. We examined various contractor documents, including quality control plans, literacy instructor qualifications, and training plans. We conducted site visits to six ANSF training locations, where we observed ANSF training classes and analyzed documentation, such as attendance rosters, for specific classes. We interviewed officials from NTM-A/CSTC-A; two Regional Commands and one Regional Support Command; the U.S. Central Command Joint Theater Support Contracting Command's General Support Contracting Center in Kabul; the three contractors; the Afghan Ministries of Interior, Defense, and Education; the ANA and ANP; and nongovernmental organizations. We conducted work in Washington, D.C., and Kabul, Balkh, and Helmand provinces in Afghanistan from November 2012 to January 2014, in accordance with generally accepted government auditing standards. A complete discussion of our scope and methodology is in appendix I.

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<sup>1</sup> The United Nations Educational, Scientific, and Cultural Organization defines functional literacy as the ability to identify, understand, interpret, create, communicate, compute, and use printed and written materials associated with varying contexts.

<sup>2</sup> In October 2013, the International Security Assistance Force realigned NTM-A/CSTC-A. This realignment split the two components of the command and shifted their responsibilities, with CSTC-A assuming responsibility for the ANSF literacy training program. Due to the timing of this change, which occurred after we finished our field work, we refer to NTM-A/CSTC-A throughout this report.

<sup>3</sup> For the purposes of this report, literacy refers to reading and writing in Dari or Pashto, two of the main native languages used in Afghanistan. Level 1 literacy is basic literacy equivalent to first grade proficiency, and Level 3 is functional literacy equivalent to third grade proficiency.



## BACKGROUND

According to the Under Secretary of Defense for Policy, NTM-A/CSTC-A's literacy training program for the ANSF is the largest literacy program in Afghanistan. In addition to providing soldiers and police with the skills needed to account for their equipment and pay, Afghan officials have reported that literacy training has positive impacts on recruiting and retention and produces indirect benefits in such areas as local employment.

In coordination with the Ministry of Education, NTM-A/CSTC-A determined that the literacy training could be delivered in 312 total hours of instruction through three different levels. Table 1 shows the hours of instruction, class location, and type of instruction provided for each level of literacy training provided under NTM-A/CSTC-A's program.

**Table 1 - Training Provided under NTM-A/CSTC-A's ANSF Literacy Program**

Literacy Level	Number of Hours	Class Location	Instruction Provided
Level 1	64	Training centers <sup>a</sup>	<ul style="list-style-type: none"> <li>• Read, write, pronounce, and identify letters</li> <li>• Read and write short words</li> <li>• Read and write one's own name</li> <li>• Count up to 1,000</li> <li>• Identify, write, and order numbers up to 1,000</li> <li>• Add and subtract triple-digit whole numbers</li> </ul>
Level 2	128	Fielded units <sup>b</sup>	<ul style="list-style-type: none"> <li>• Read, write, and explain descriptive texts</li> <li>• Spell commonly used words</li> <li>• Carry out double-digit by single-digit multiplication and division</li> <li>• Identify units of measurement</li> </ul>
Level 3	120	Fielded units <sup>b</sup>	<ul style="list-style-type: none"> <li>• Read, write, and comprehend short paragraphs</li> <li>• Use correct punctuation to aid meaning and understanding</li> <li>• Add and subtract using six-digits numbers</li> <li>• Multiply and divide with three-digit numbers.</li> </ul>

<sup>a</sup> NTM-A/CSTC-A literacy program provides Level 1 literacy instruction during the ANA's Basic Warrior Training program and the ANP's Basic Initial Police Training Course for new recruits.

<sup>b</sup> NTM-A/CSTC-A also provides Level 2 and 3 literacy instruction at the Darulaman Literacy Center in Kabul.

Source: NTM-A/CSTC-A.

On behalf of NTM-A/CSTC-A, in August 2010, the U.S. Central Command Joint Theater Support Contracting Command's General Support Contracting Center (GSCC)<sup>4</sup> issued firm fixed-price, indefinite delivery/indefinite quantity contracts to three companies: OTTS, a U.S.-based company; Insight Group, an Afghan company; and HEIK, also an Afghan company, to execute the literacy training program.<sup>5</sup> The combined value of all three

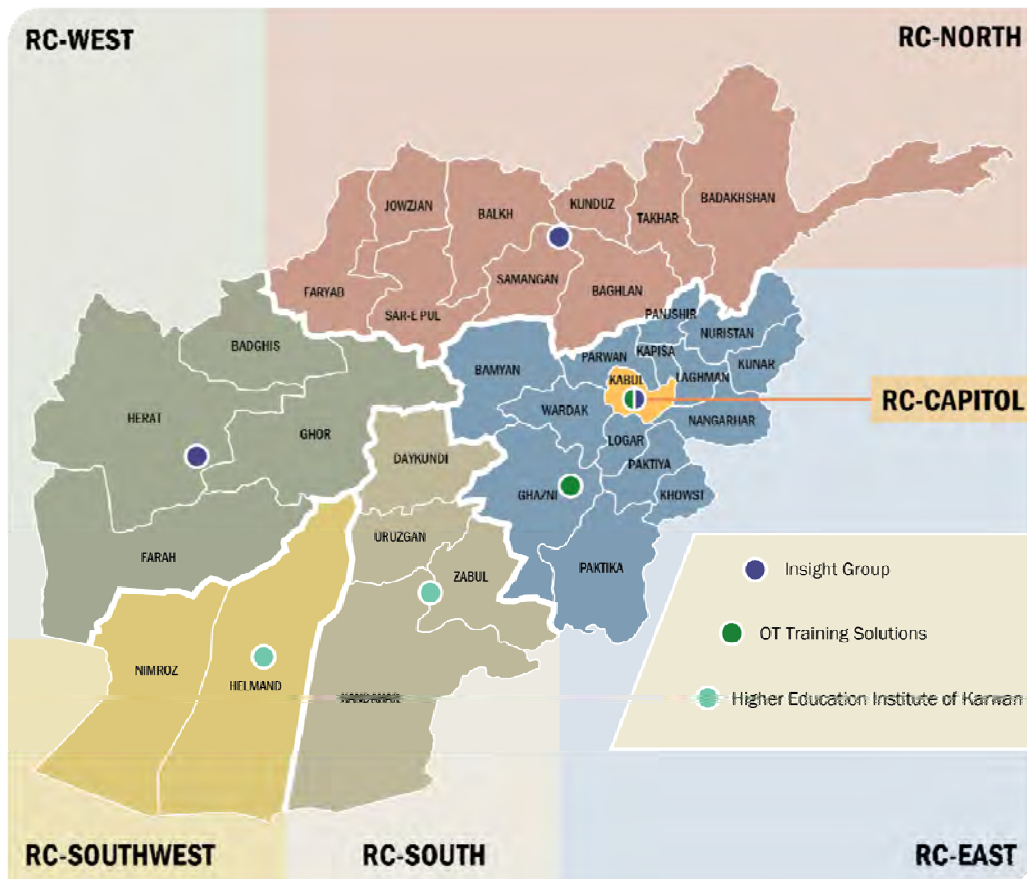
<sup>4</sup> The Kabul Regional Contracting Center initially awarded the three contracts. GSCC assumed responsibility for contract administration in September 2012.

<sup>5</sup> The contract numbers for OTTS, Insight Group, and HEIK are W91B4M-10-D-4011, W91B4M-10-D-4009, and W91B4M-10-D-4010, respectively. These contracts replaced two prior literacy training contracts. In June 2007, Raytheon Technical Services Company LLC received an indefinite delivery/indefinite quantity contract worth a maximum of \$11.2 billion to provide worldwide operations maintenance sustainment and instructional support of training systems used by the U.S. military, multi-national coalition forces, and foreign military sales. The contract included support to NTM-A/CSTC-A for training the ANA in subjects such as literacy, driving, and weapons. In September 2008, Cetena Group received a firm-fixed-price definitive contract with a total cost of \$5.4 million for ANP literacy training.

contracts is \$200 million for up to 5 years.<sup>6</sup> The terms of each contract allowed GSCC to exercise a base year and four 1-year options. As of August 2013, GSCC had exercised the base year and three 1-year options, made 39 modifications to the base contracts, and issued 227 task orders on the three contracts.<sup>7</sup>

GSCC assigned geographical areas to OTTS, Insight Group, and HEIK that reflected the International Security Assistance Force’s regional command structure. OTTS conducted training in the east, Insight Group conducted training in the north and west, and HEIK conducted training in the south and southwest regions of Afghanistan.<sup>8</sup> Figure 1 illustrates this geographic breakdown. According to the acquisition plan for the contracts, the contractors would be required to provide literacy training (Level 1, 2, and 3) for approximately 60,000 ANSF personnel each year across Afghanistan.<sup>9</sup>

**Figure 1 - Breakdown of Literacy Training Contracts by Regional Command and Contractor**



Note: RC = Regional Command.

Source: NTM-A/CSTC-A.

<sup>6</sup> According to NTM-A/CSTC-A officials, beginning October 1, 2013, the literacy training contracts will be funded by the North Atlantic Treaty Organization’s ANA Trust Fund.

<sup>7</sup> Generally used on contracts that do not specify a firm quantity, task orders are documents used by the government to authorize the contractors’ performance of acquired services during the period of the contract.

<sup>8</sup> The Regional Commands coordinate all civil-military activities conducted by the military elements of the provincial reconstruction teams in their area of responsibility. There are currently six Regional Commands: North, West, East, South, Southwest, and Capital.

<sup>9</sup> The literacy program acquisition plan lays out the strategy to be used and the coordination required to obtain timely, cost-effective literacy training for the ANSF.

## MORE THAN 224,000 ANSF PERSONNEL HAVE RECEIVED BASIC LITERACY TRAINING, BUT LITERACY PROGRAM LACKS KEY ELEMENTS CRITICAL TO MEASURING PROGRAM SUCCESS

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In October 2013, senior NTM-A/CSTC-A officials told us that the literacy training program has been successful in providing basic and functional literacy to ANSF personnel. NTM-A/CSTC-A officials based their remarks on two points. First, NTM-A/CSTC-A reports that fewer than 13,000 ANSF were at Level 1 literacy in October 2009. However, as of October 2013, the command reported that 224,826 ANSF personnel had passed Level 1 training, 93,880 had passed Level 2, and 73,700 had passed Level 3 since the program's inception in November 2009.<sup>10</sup> Second, if measured against the 148,000 personnel end strength in place when the literacy program started, then NTM-A/CSTC-A exceeded its goal of having 100 percent of ANSF personnel passing Level 1 and almost met its goal of having 50 percent of ANSF personnel passing Level 3 training. However, if compared to the current end strength of 352,000 ANSF personnel, then NMT-A/CSTC-A falls short of meeting its goal for the literacy program, with about 64 percent of personnel passing Level 1 training and about 21 percent of personnel passing Level 3 training.<sup>11</sup>

During the course of our audit, several NTM-A/CSTC-A officials told us they did not know how the goal—having 100 percent of ANSF personnel passed Level 1 training and 50 percent of ANSF personnel passing Level 3 training—was developed. They added that, if based on the current authorized ANSF end strength of 352,000 personnel, the goal may be “unrealistic” and “unattainable.”

The command's reliance on reported numbers of recruits that have passed literacy training as the key measure of program success also obscures the fact that the program appears to have had limited impact on the actual literacy levels within the ANSF. Some command officials responsible for the literacy training program roughly estimated that over half of the force was still illiterate as of February 2013. According to NTM-A/CSTC-A officials, this low level of literacy is likely to persist through the end of the decade.

### Literacy Training Contracts Lack Key Elements to Measure Training Outcomes, and External Factors Limit NTM-A/CSTC-A's Ability to Determine Program Success

NTM-A/CSTC-A omitted four key requirements from the literacy training contracts, negatively impacting its ability to effectively manage and oversee the literacy program. Specifically, the contracts do not require NTM-A/CSTC-A to independently verify students' proficiency at the three literacy levels, nor do the contracts require the contractors to track literacy class graduates in a manner that would allow NTM-A/CSTC-A to ascertain the impact of its literacy training. In addition, the contracts lack measurable performance standards and clear requirements for class sizes and length of training. These challenges, together with security concerns, poor attendance, and attrition also make it difficult for NTM-A/CSTC-A to determine program success.

#### Contracts Do Not Require Independent Verification of Training Results

Even though NTM-A/CSTC-A reported that 224,826 ANSF personnel passed Level 1 literacy training, and 73,700 ANSF personnel passed Level 3 training, the command cannot ensure the accuracy of those numbers.

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<sup>10</sup> The Department of Defense reported that over 90 percent of ANSF recruits who complete the literacy classes pass tests administered by the contractors to determine proficiency.

<sup>11</sup> According to Department of Defense reports, the size of the ANSF increased from roughly 250,000 personnel in 2010, when the three literacy training contract were awarded, to about 350,000 personnel as of June 2013. NTM-A/CSTC-A reported 346,638 personnel assigned as of August 2013. At the May 2012 Chicago Summit, the United States, its North Atlantic Treaty Organization allies, other coalition partners, and the Afghan government anticipated a carefully planned drawdown, based on security conditions, to an ANSF goal of 228,500 personnel in 2017, from its currently approved level of 352,000. We are currently conducting an audit examining the reliability of ANSF personnel data and plan to issue a final report in 2014.

This is because the three literacy training contracts do not provide a mechanism for NTM-A/CSTC-A to independently determine students' proficiency at Levels 1 through 3. Currently, OTTS, Insight Group, and HEIK administer proficiency tests once students complete the required hours of Level 1, 2, or 3 training. Students who pass these tests are deemed proficient at the level tested. However, NTM-A/CSTC-A does not independently assess students' language proficiency or evaluate the effectiveness of the contractors' instruction. According to officials with EUREKA Research—an Afghan company NTM-A/CSTC-A contracted with in late 2010 to provide assistance with quality assurance—neither evaluating contractor performance nor assessing student outcomes was included in its contracted quality assurance activities.

### **Contractor Reporting Does Not Enable NTM-A/CSTC-A to Track ANSF Literacy Levels**

As part of their contractual requirements, OTTS, Insight Group, and HEIK provide progress reports containing a significant amount of aggregate ANA and ANP literacy class data.<sup>12</sup> However, the three contractors are not required to report on the number of literacy training graduates in a manner that would allow NTM-A/CSTC-A to more easily track literacy rates within the ANSF. Specifically, the reporting does not link the names and military identification numbers of students listed on class rosters with course graduation rosters and their assigned units' personnel lists. As a result, NTM-A/CSTC-A is unable to track graduates after they leave literacy training and join, or rejoin, their assigned units, or determine how many trained personnel remain in the ANSF. Without mechanisms for reporting on and tracking ANSF personnel literacy training outcomes, the command cannot determine the overall level of literacy in the ANSF.

### **Contracts Do Not Clearly State Requirements for Class Size or Length of Instruction**

The literacy training contracts allow OTTS, Insight Group, or HEIK to bill NTM-A/CSTC-A for each "class" where instruction was provided, rather than for the number of hours taught in each class. However, the contracts do not clearly define class size or set the minimum standard of hours taught in each class. The lack of clarity allowed one contractor to bill for multiple classes held at the same location and at the same time "when the total student load fit within standards for a single class," and for classes held for as little as 2 hours a month.

The contracts state that class size should be "+/- 33,"<sup>13</sup> which NTM-A officials told us they interpret as the maximum instructor to student ratio. In other words, each class is required to have one instructor for every 33 students. If a class has more than 33 students, the contractors are required to assign another instructor to the class. However, the actual number of students in attendance for a class could be much less. The contracts also state that OTTS, Insight Group, and HEIK literacy instructors shall work a 45-hour week, teaching students 6 hours a day, 5 days a week, for a total of 30 hours dedicated to literacy instruction. The contracts also call for "literacy laboratory"—working with remedial students 5 hours each week. However, it appears that class size is not linked to the number of required instructional hours. In other words, because the contractors are allowed to bill by the number of classes taught, they could teach many small-size classes held for a few hours per week. The lack of clear linkage of class size and number of hours taught means that U.S. government funds used to support NTM-A/CSTC-A's literacy programs are exposed to a risk of waste.

In commenting on a draft of this report, NTM-A stated that the command is responsible for ensuring all class requests meet internal minimum class size and minimum hours of instruction per month prior to approving the class request, and that the contractor cannot mandate or solicit attendance. While we agree that it is not the responsibility of the contractor to mandate or solicit attendance, our point is that, because of poorly defined contract requirements, U.S. government funds are being paid to contractors for teaching multiple, poorly-attended classes held for a few hours per week. In fact, NTM-A officials told us in October 2013 that the command was taking steps to eliminate these "nonproductive" classes. One of these efforts was to develop

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<sup>12</sup> Examples of data reported include the numbers of (1) classes conducted, (2) students, and (3) graduates—by level. The contractors also report on the location of the training and students' names.

<sup>13</sup> The contracts specify "Class Size: +/- 33" or "Individual Class Size: +/- 33," depending on the contract line item.

new internal program requirements for approving classes, including a requirement that classes meet at least 8 hours each week. These new internal program requirements would be strengthened if they were included in the contracts.

In addition, the contract line item for literacy training that OTTS, Insight Group, and HEIK most frequently billed against did not specify the total number of instruction hours permitted per class. According to the FAR, contracts may identify the items or services to be provided as separately identified line items.<sup>14</sup> The three literacy training contracts contain five contract line items for providing literacy instruction for Levels 1, 2, and 3. Four of these line items specified the maximum total number of instruction hours permitted for each literacy class. For example, literacy classes billed for under the contract line item specifically for Level 1 training could not exceed 64 hours, and extensive literacy training in Levels 1 through 3 could not exceed 312 hours when billed under a separate contract line item. However, the fifth contract line item did not establish a maximum total number of hours of instruction permitted for each class, thus allowing the contractors to bill for classes under this line item indefinitely. We determined that the contractors billed most classes under this contract line item. According to NTM-A/CSTC-A officials, the command is ending the use of this fifth contract line item.

NTM-A/CSTC-A officials recognized the financial risks of not having clearly defined requirements for classes and length of instruction and began taking steps in July 2012 to change their processes for validating the need for and approving requested classes. For example, NTM-A/CSTC-A's program managers began calling ANSF commanders at the identified site to confirm the need for the classes requested, determine the number of classes to be provided, and determine the expected student enrollment.<sup>15</sup> In addition, the current contracting officer's representative told us that during the course of our audit, the command developed standardized criteria for approving new classes. The proposed classes must (1) enroll a minimum class size of 10 students, (2) provide a minimum instruction of 8 hours per week, (3) start at least 6 calendar days prior to the end of the month, and (4) be located at an existing training site. However, these requirements have not been documented in a modification to the contracts. As such, their effectiveness remains largely anecdotal and may not provide the necessary assurance that resources are not wasted on unnecessary literacy classes.

### Contracts Lack Measurable Performance Standards

The three literacy contracts also lack measurable performance standards that link to NTM-A/CSTC-A's program goals. The FAR requires the use of "performance-based acquisition methods to the maximum extent practicable."<sup>16</sup> Specifically, the FAR states that performance-based contracts for services shall include (1) a performance work statement; (2) measurable performance standards (in terms of quality, timeliness, and quantity, among other things) and the method of assessing contractor performance against those standards; and (3) performance incentives where appropriate.<sup>17</sup> It also requires agencies, to the maximum extent practical, to describe the work in terms of the required results, rather than either "how" the work is to be accomplished or the number of hours to be provided.<sup>18</sup> U.S. Army regulations also require agencies to ensure that contracts have provisions for managing and measuring performance.<sup>19</sup>

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<sup>14</sup> FAR 4.10.

<sup>15</sup> According to NTM-A/CSTC-A's contracting officer's representative for the literacy training contracts, requests for literacy classes are submitted to the Literacy Branch by coalition force personnel working with the ANA or ANP or directly from ANA or ANP units if they are not supported by the coalition force. However, the direct ANA and ANP requests are generally submitted for them by senior literacy training contractor officials at the training sites. After review, the class requests are approved or disapproved by the contracting officer's representative. If the class is approved, NTM-A/CSTC-A officials send a letter and a spreadsheet (of approved classes) to the applicable contractor.

<sup>16</sup> FAR 37.102.

<sup>17</sup> FAR 37.601.

<sup>18</sup> FAR 37.602.

<sup>19</sup> Specifically, Army Regulation 70-13 calls for the requiring activity—NTM-A/CSTC-A in this case—to translate needs into actionable requirements for contract award that allow for proper management and measurement of outcomes throughout

The performance work statement for the literacy program does not include measurable performance standards, such as a quantitative evaluation of literacy training's effectiveness and outcomes. Our analysis of the contracts showed that they only require the contractors to teach each student to read and write in either Dari or Pashto and perform basic mathematics with no mention of the overall program goals or other targets. Further, the performance work statements for the contracts list only four performance objectives: (1) hire personnel qualified to teach Dari and/or Pashto, (2) provide all training aids and materials, (3) develop and execute a comprehensive program of instruction, and (4) provide required hours of classroom instruction per week. None of these performance objectives addresses training results or links to achievement of NTM-A/CSTC-A's broader program goals.

Partly in response to suspected deficiencies in its oversight of the contracts, NTM-A/CSTC-A created a crisis action team in October 2012 to conduct an internal review of the literacy program. The command's crisis action team identified multiple deficiencies in the three literacy training contracts, including a lack of (1) mechanisms to evaluate effectiveness of the contractors' instruction and (2) contractor reporting requirements that would enable the command to assess or track the levels of literacy in the ANSF. As a result of the internal review, NTM-A/CSTC-A drafted a new literacy training contract, valued at \$50.7 million, that would have replaced the three ongoing contracts and include key changes to address the deficiencies noted. However, due to time constraints, lack of planned independent oversight, and other factors, NTM-A/CSTC-A decided in July 2013 to forgo awarding the new contract and continued providing instruction under the ongoing contracts.

### **Security Challenges, Poor Class Attendance, and Attrition Affect NTM-A/CSTC-A's Literacy Training Program**

Security pressures and the need to send recruits to the field more quickly have resulted in recruits not completing the full 64 hours of instruction needed to achieve Level 1 literacy proficiency as part of their basic training requirement. For example, from February to July 2013, the Ministry of Defense (MOD) decreased the length of basic training program for ANA recruits from 9 weeks to 8 weeks and removed literacy training from the official program of instruction.<sup>20</sup> In addition, some ANP recruits have not received the required hours of literacy instruction. According to Regional Support Command-Southwest officials, 45 percent of police personnel recruited between July 2012 and February 2013 were sent directly to field checkpoints without receiving any literacy training. As a result, additional resources have to be spent to provide untested and untrained personnel with literacy training they should have completed in basic training.

Moreover, although NTM-A/CSTC-A provides literacy training in the field for ANA and ANP forces, attendance is an ongoing problem within both forces. Based on inspections conducted by coalition forces, NTM-A/CSTC-A estimated that overall attendance was around 50 percent since February 2011. According to NTM-A/CSTC-A officials, a reason for this low attendance level is that some ANA commanders do not ensure that soldiers who need literacy training are available to attend classes.

High levels of attrition in the ANSF pose another challenge for NTM-A/CSTC-A's literacy training program. One NTM-A/CSTC-A official told us that illiteracy remains a concern even in the ANSF's junior officer ranks due to an annual turnover of 30,000-40,000 personnel across the army and police. Other NTM-A/CSTC-A officials estimated that the ANSF attrition rate is 30-50 percent annually. Therefore, despite NTM-A/CSTC-A reporting that 224,826 ANSF personnel had passed at least Level 1 training as of October 2013, it is unlikely that all of

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contract performance. The requiring activity is the entity that has a requirement for supplies or services and requests the initiation of the acquisition. The requiring activity has personnel who are responsible for developing command resource requirements, identifying sources of funding, determining costs, acquiring funds, distributing and controlling funds, and tracking costs and obligations.

<sup>20</sup> NTM-A/CSTC-A and ANA officials told us that literacy was still being emphasized and taught most days after other basic training requirements were met. However, NTM-A/CSTC-A officials at the Kabul Military Training Center noted that only roughly 80 percent of recruits received the required 64 hours needed to take the post test for literacy proficiency.

these personnel are still in the ANSF. As a result, it is difficult for the command to determine the impact of its program on increasing the overall level of literacy in the ANSF.

### **NTM-A/CSTC-A Plans to Adjust Program Goals**

When we briefed NTM-A/CSTC-A officials in October 2013 on the preliminary results of the audit, they acknowledged that reporting “quantity” may not be the best measurement of success for the literacy training program. They also stated they were planning to adjust the program goals to ensure that they are more realistic. For example, NTM-A/CSTC-A officials proposed that one of the new goals will be to assist ANSF in achieving 100,000 personnel trained to literacy Level 3 by 2014, rather than the current 50 percent goal.<sup>21</sup>

In addition, NTM-A/CSTC-A officials agreed that the lack of clearly defined requirements for ANSF literacy classes may have resulted in wasted funds, and they have taken actions to correct the problem. Specifically, the command is (1) ending the use of a “non-productive” contract line item (the fifth contract line item noted above) that was used by the contractors to bill for the classes, and (2) either combining or suspending classes with low attendance or training hours. According to NTM-A/CSTC-A officials, these actions have already saved the command \$1.07 million.

## **OVERSIGHT OF CONTRACTOR PERFORMANCE IS IMPROVING, BUT FUTURE OVERSIGHT CAPABILITY MAY BE AT RISK**

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### **NTM-A/CSTC-A Initially Allowed the Literacy Training Program to Expand beyond Its Oversight Capability, but Has Taken Steps to Improve Oversight**

Multiple regulations and contract requirements govern NTM-A/CSTC-A’s oversight of the literacy training contracts. Both the FAR and U.S. Army contracting regulations require contracting agencies to prepare quality assurance surveillance plans and perform surveillance efforts in accordance with those plans.<sup>22</sup> In addition, the Army’s regulations require contracting officer’s representatives to perform inspection of services, reject nonconforming services, and verify correction of deficiencies for contractor-delivered services.<sup>23</sup>

The quality assurance surveillance plans for the literacy contracts required NTM-A/CSTC-A to verify that the literacy training contractors (1) hire personnel qualified to teach Dari and/or Pashto, (2) provide all training aids and materials, (3) develop and execute a comprehensive program of instruction, (4) provide the required hours of classroom instruction per week, and (5) require their instructors to work 45 hours per week, with 30 of those hours dedicated to literacy instruction. Further, the literacy training acquisition plan called for close monitoring of literacy classes by coalition forces at the site to mitigate the risks<sup>24</sup> resulting from instruction occurring at a wide range of locations across the entire country of Afghanistan. The plan tasked NTM-A/CSTC-A with either assigning a contracting officer’s representative to each location or developing alternative plans to ensure site inspections occurred. However, no contracting officer’s representatives were assigned to the site locations. The acquisition plan also noted that a fragmentary order<sup>25</sup> had been drafted that would assign

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<sup>21</sup> Other proposed new goals pertain to NTMA-/CSTCA’s Train-the Trainer program and transitioning planning, which are discussed later in this report.

<sup>22</sup> FAR 46.401 and Army Regulation 70-13.

<sup>23</sup> Army Regulation 70-13.

<sup>24</sup> Risks noted in the acquisition plan included lack of oversight, contractors’ failure to perform, and contractors’ uneven workload.

<sup>25</sup> A fragmentary order is a military order used to send timely changes of existing orders to subordinate and supporting commanders while providing notification to higher and other applicable commands.

coalition military observers to site locations to conduct inspections.<sup>26</sup> Yet, SIGAR found that the International Security Assistance Force never approved the draft order. Thus, no military observers were assigned to conduct inspections of the literacy classes.

To ensure that site inspections occurred, NTM-A/CSTC-A contracted with EUREKA Research in December 2010 to conduct visits at 960 training locations twice each year and monitor literacy classes provided by OTTS, Insight Group, and HEIK.<sup>27</sup> In addition, NTM-A/CSTC-A formed a mobile team, made up of U.S. and coalition military personnel, and tasked it with conducting site visits to monitor the contractors' classes. However, the command eliminated the mobile team in early 2012,<sup>28</sup> leaving only EUREKA Research to monitor the contractors' work. By the fall of 2012, the number of training locations reached approximately 3,200, with roughly 6,000 classes across Afghanistan—more than three times the number that EUREKA Research's contract required it to visit annually. As a result of the increase in the number of training locations, EUREKA's ability to effectively evaluate the literacy classes was effectively diminished.

NTM-A/CSTC-A has taken steps to improve its oversight of the literacy training classes. As a result of the October 2012 internal program review, NTM-A/CSTC-A reduced the number of its literacy classes by keeping only those classes that had at least five students (rather than the minimum two required under the contract) and those where literacy students were graduating. By February 2013, NTM-A/CSTC-A had decreased the number of classes to fewer than 5,000 and reduced the locations to fewer than 2,700 across Afghanistan. As of August 2013, the command reported that it had further decreased the number of classes to 2,204 and reduced the locations to 589—86 ANA locations and 503 ANP locations.<sup>29</sup> NTM-A/CSTC-A also began conducting random site visits on a monthly basis. Under a new fragmentary order issued by the International Security Assistance Force in late 2012, personnel from the Regional Support Commands started visiting literacy classes, primarily those conducted at training centers, within their areas of operations.

## **NTM-A/CSTC-A Awarded a New Quality Assurance Contract, but the Command's Oversight Capability Will Decrease as the Drawdown Continues**

NTM-A/CSTC-A did not extend EUREKA Research's contract when it ended in June 2013,<sup>30</sup> and did not award a new quality assurance contract until December 15, 2013. To conduct oversight during the 6-month gap, command officials said they used feedback from site visits conducted by U.S. and coalition forces and contractor data provided to contracting officer's representatives.

However, our analysis of the performance work statement for the new quality assurance contract shows that NTM-A/CSTC-A plans on requiring the contractor to perform only four tasks: (1) show proof of instructor qualification, (2) provide an oversight assessments excel worksheet, (3) provide compliance oversight assessment checklists, and (4) submit invoices. Similar to the quality assurance surveillance plan used by EUREKA Research, the plan for the new quality assurance contract does not include any mechanism for NTM-A/CSTC-A to conduct independent testing of student outcomes.

This potential oversight weakness will be exacerbated as the military drawdown continues through December 2014. Specifically, NTM-A/CSTC-A's ability to oversee the literacy training contracts and the new quality

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<sup>26</sup> The acquisition plan did not indicate which organization drafted this order.

<sup>27</sup> The performance work statement for EUREKA Research's contract specified the number of training locations to be visited each year, not the number of classes to be inspected. Multiple classes may occur at a training location.

<sup>28</sup> According to NTM-A/CSTC-A officials, neither the military forces nor EUREKA were resourced to provide the oversight required at the literacy program's highest point in terms of locations and classes.

<sup>29</sup> A total of 48,531 soldiers and police were enrolled in these classes.

<sup>30</sup> Before June 2013, the command was considering a different approach to quality assurance that could have included quantitative assessment of contractors' performance.



assurance contractor with U.S. or coalition force personnel will likely decrease as the number of these personnel who are available to conduct this oversight also decreases. Thus, it is imperative that the new quality assurance contract includes the elements necessary for ensuring that the contractors conduct classes in accordance with the terms of the contracts.

## NTM-A/CSTC-A HAS TAKEN STEPS TO TRANSFER AND SUSTAIN THE LITERACY TRAINING PROGRAM, BUT LACKS A FORMAL STRATEGY FOR IMPLEMENTING AGREEMENTS

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### MOD and MOI Have Been Slow to Implement Agreed upon Actions

When NTM-A/CSTC-A developed a strategy and plan for the literacy training program, the command stated that its goal was to create a program that was “ultimately ANSF delivered, reflects the ANSF’s vision, meets ANSF requirements for training, and is sustainable.” This strategy and plan set July 2013 as the target date for transferring responsibility for literacy training in the field to the MOD and MOI. Once transferred, MOD and MOI would manage the literacy training program, and the ANSF would implement it with support from nongovernmental organizations, as appropriate. NTM-A/CSTC-A would maintain responsibility for training conducted at the ANSF training centers through 2014, but would start to transfer training at these locations to the Afghan government in mid-2014. In addition, MOD and MOI would expand basic recruit training to include literacy training at Levels 1, 2, and 3 for illiterate recruits, and NTM-A/CSTC-A would implement a train-the-trainer program—a program estimated to cost approximately \$335,000 that began November 2013. However, the strategy and plan were contingent upon gaining the ministries’ support and approval. Despite numerous attempts, NTM-A/CSTC-A did not obtain immediate support for its strategy and plan. According to NTM-A/CSTC-A officials, MOD and MOI cited reductions in the number of literacy classes and the quality of literacy instructors as concerns preventing them from supporting NTM-A/CSTC-A’s plans for the literacy program.

MOD’s and MOI’s initial reluctance to sign agreements to increase the length of basic recruit training to allow for literacy training through Level 3 for illiterate recruits also delayed the program’s transfer process. For example, instead of implementing a plan proposed by NTM-A/CSTC-A in February 2013 that would have extended ANA basic training to 20 weeks, up from the then 9-week training, to allow for literacy training through Level 3, MOD temporarily reduced the length the ANA’s basic training to 8 weeks and eliminated literacy training from the program of instruction. In May 2013, however, MOD, MOI, and the Ministry of Education each signed a letter committing to NTM-A/CSTC-A’s plans for the literacy program. For example, the MOD and MOI agreed to expand training for ANA and ANP recruits, respectively, to allow time for literacy training through Level 3. MOD would provide 8 weeks of literacy training to those ANA recruits requiring such skills, in addition to 8 weeks of basic training. Recruits already possessing basic literacy skills would proceed directly to basic training. After basic training, roughly 20 percent of the recruits would attend one of several ANSF branch schools for specialized training;<sup>31</sup> the other roughly 80 percent would be assigned directly to fielded units. MOI would also extend training for its ANP recruits from 10 to 16 weeks to allow for literacy training. In addition, MOD and MOI agreed that their recruits graduating from the train-the-trainer program would return to their units as literacy instructors.

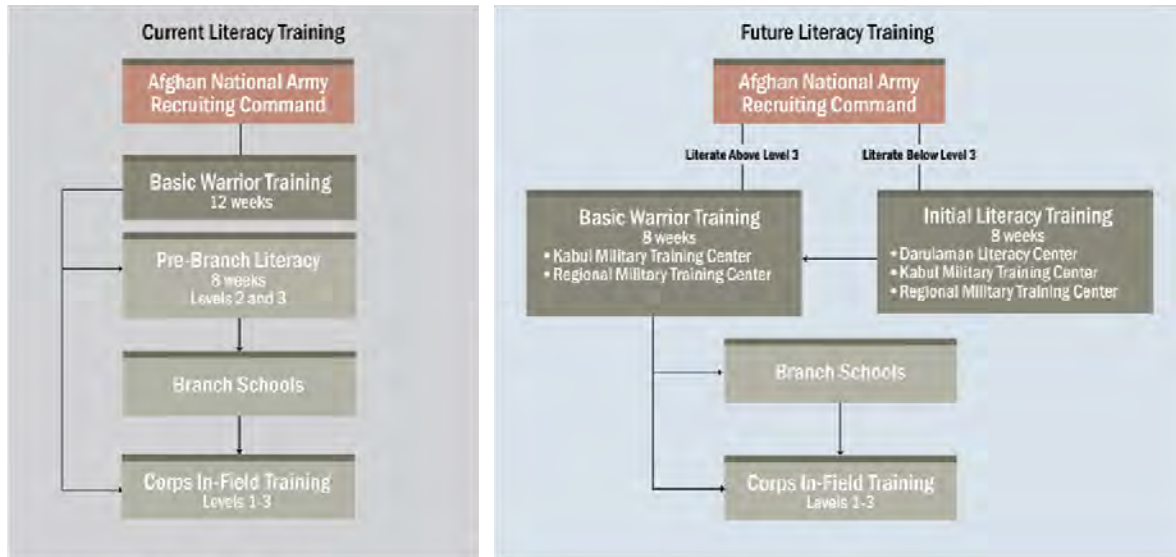
Figure 2 shows the current and future literacy training plans for the ANA and ANP. The projected literacy training timeline is shown in figure 3.

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<sup>31</sup> The ANA branch schools are designed to professionalize the force. They include such areas as combat support services, signal, artillery, armor, and military police. Level 3 literacy is a requirement for attendance.

Figure 2 - Current and Future Plans for Providing Literacy Training for the ANA and ANP

**ANA Literacy Training Approach**

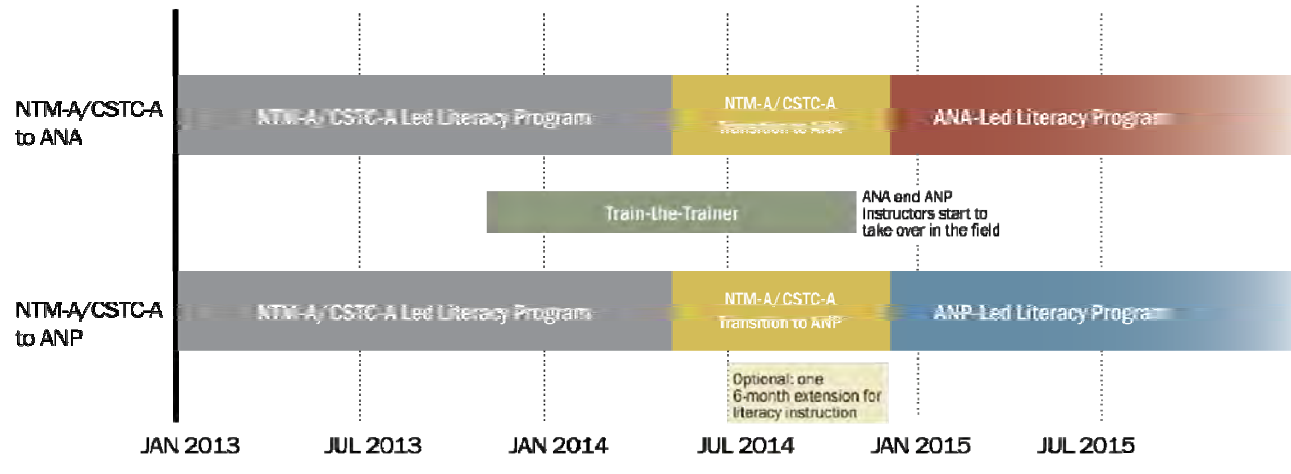


**ANP Literacy Training Approach**



Source: NTM-A/CSTC-A.

**Figure 3 - Projected Literacy Training Program Transition Timeline**



Source: NTM-A/CSTC-A.

Although ANA officials added the literacy training requirement back into the official program of instruction for recruits, NTM-A/CSTC-A officials noted that MOD has made limited discernible progress in implementing the expanded 16-week basic training program. Similarly, NTM-A/CSTC-A officials also said there has been limited progress made by the MOI in implementing its planned 16-week basic training program for ANP recruits.

Despite the challenges in obtaining MOD and MOI commitment to expanding literacy training during basic training for the ANA and ANP, NTM-A/CSTC-A, MOD, MOI, the Ministry of Education, the United Nations Educational, Scientific, and Cultural Organization, and Deutsche Gesellschaft fur International Zusammenarbeit (GIZ)<sup>32</sup> have made and continue to make substantial commitments to NTM-A/CSTC-A's train-the-trainer program. In fact, GIZ provided the curriculum for the program at no cost to NTM-A/CSTC-A. MOD and MOI agreed to the curriculum and committed to sending 1,500 ANA and 1,000 ANP personnel to participate in the program. These 2,500 personnel will receive training over the 13-month period from November 2013 through December 2014, and return to the field or training centers as literacy instructors for their respective units. The United Nations Educational, Scientific, and Cultural Organization, which currently implements the Literacy Empowerment for Afghan Police program, agreed to teach an additional 500 policemen to become literacy instructors.<sup>33</sup>

In addition to providing the curriculum for NTM-A/CSTC-A's train-the-trainer program, GIZ has made other commitments to the ANSF literacy training program. In July 2013, the international community, through the Law and Order Trust Fund for Afghanistan, approved GIZ to provide literacy training to ANP personnel in all 34 Afghan provinces.<sup>34</sup> Subsequently, GIZ agreed to take over all of NTM-A/CSTC-A's literacy classes for ANP

<sup>32</sup> GIZ is a German nongovernmental organization that operates throughout Germany and in more than 130 countries, including Afghanistan. GIZ primarily supports the German Federal Ministry for Economic Cooperation and Development and other German ministries.

<sup>33</sup> Literacy Empowerment for Afghan Police is a program funded by the government of Japan. The United Nations Educational, Scientific, and Cultural Organization launched the program in June 2011 to provide literacy training to Afghan national police and improve quality of policing in Afghanistan.

<sup>34</sup> The Law and Order Trust Fund for Afghanistan, a multilateral trust fund set up in 2002, provides a mechanism for coordinating contributions from international partners in support of the Afghan police force. It is managed by the Afghan government, through the Ministries of Interior and Finance. The largest contributors to LOFTA are the United States, the European Union, and Japan. Other contributors are Australia, Belgium, Canada, Czech Republic, Denmark, Finland, Hungary, Germany, Iceland, Ireland, Italy, Latvia, Netherlands, Norway, Switzerland, and the United Kingdom.

personnel at fielded units at its own expense. NTM-A/CSTC-A will continue to maintain responsibility for literacy classes conducted at ANSF training centers.<sup>35</sup> GIZ first took responsibility for NTM-A/CSTC-A's ANP literacy classes in Parwan province. As of November 2013, GIZ had taken over a total of 410 classes. GIZ plans to assume responsibility for NTM-A/CSTC-A's remaining literacy classes for ANP personnel at fielded units in other provinces in phases through 2014.

If GIZ provides the literacy training as planned, its contribution could lower the costs of the training NTM-A/CSTC-A provides. The contracting officer representative for the literacy training contracts told us that GIZ's contribution could potentially reduce the command's literacy training costs by \$600,000 through the end of 2014. Further, it could allow the command to focus its limited resources on performing quality assurance services at training centers, where most of the training conducted under the three literacy contracts will occur.<sup>36</sup>

## NTM-A/CSTC-A Has Not Developed a Coordinated Strategy for Transferring and Sustaining the Literacy Program

A key to enhancing stakeholder collaboration and addressing longstanding problems is to develop and formally implement an overarching strategy.<sup>37</sup> Although NTM-A/CSTC-A, MOD, MOI, the United Nations Educational, Scientific, and Cultural Organization, and GIZ have increased their coordination and agreed to actions for transferring and sustaining the ANSF literacy training program, the command has not developed a new transfer and sustainment strategy that defines stakeholder responsibilities and commitments, program goals, milestones, metrics, or timelines. Further, although MOD and MOI have established timelines for fulfilling their commitments to NTM-A/CSTC-A's train-the-trainer program, neither ministry has established timelines for implementing the expanded basic training to include Level 1 through Level 3 literacy training as agreed.

After a meeting in October 2013, NTM-A/CSTC-A officials gave us a draft of the command's Joint Plan for Implementing Literacy Programs. However, the draft plan addresses literacy training only for ANP personnel, not ANA personnel. Without a coordinated strategy that defines program goals and milestones to focus and guide stakeholders as well as their individual efforts, the potential for further delays exists if stakeholders do not implement commitments as planned. This could result in a waste of funds and limit the overall effectiveness of the training program, which, in turn, could have a negative impact on the successful transfer of a sustainable literacy program to the Afghan government.

## CONCLUSION

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Although NTM-A/CSTC-A reported that it has made great progress in increasing the numbers of ANSF personnel completing literacy training and that 224,826 ANSF personnel have passed Level 1 training (basic literacy training equivalent to first-grade proficiency) and 73,700 have passed Level 3 training (functional literacy equivalent to third-grade proficiency), it is unclear how these numbers support NTM-A/CSTC-A officials' assertion that the literacy program has been successful. First, these numbers are not measured against the current authorized end strength of 352,000 ANSF personnel. If measured against the current authorized end

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<sup>35</sup> According to NTM-A/CSTC-A officials, GIZ, which originally provided ANP literacy training only in Afghanistan's northern provinces, will not take over fielded literacy classes in Nuristan province because of security concerns.

<sup>36</sup> NTM-A/CSTC-A Literacy Branch officials also told us that GIZ's commitments will also provide continuity in the literacy training and ease the economic impact on the local Afghan workforce. For example, when NTM-A/CSTC-A transferred the ANP literacy classes in Parwan province to GIZ, the local literacy instructors, who were employed by OTTS, lost their jobs. However, GIZ plans to hire most of them, about 80 percent, to continue as instructors in the organization's literacy training effort.

<sup>37</sup> U.S. Government Accountability Office, *Interagency Collaboration: Key Issues for Congressional Oversight of National Security Strategies, Organizations, Workforce, and Information Sharing*, GAO-09-904SP, September 25, 2009.

strength, the command's reported numbers fall short of its stated goal of having 100 percent of ANSF personnel achieve Level 1 literacy and at least 50 percent of the ANSF attain Level 3. Second, even if the command has until December 31, 2014, (the date by which the command said it will meet its goal) to increase its numbers, it has not fully addressed the lack of key elements needed to determine whether its goals were met and the program was successful. For example, NTM-A/CSTC-A currently does not verify students' language proficiency, evaluate the effectiveness of instructions, monitor class size and length of instruction, or track graduates after they complete training and join their assigned units. Furthermore, the high turnover and attrition rate (about 30-50 percent annually according to some NTM-A/CSTC-A officials) makes it difficult to determine how many ANSF personnel serving in the force have passed either Level 1 or Level 3 literacy training. When implemented, NTM-A/CSTC-A's plans to adjust the program goals to ensure they are realistic could help the command better gauge its success.

In addition, even though NTM-A/CSTC-A has taken steps to improve its oversight of the literacy program (by reducing the number of ongoing classes to ensure more site inspections and by hiring a new contractor to conduct quality assurance), it still has difficulties providing appropriate contract oversight given the fact that there will be fewer resources to do so as the military drawdown continues to take place.

Lastly, although international organizations have agreed to support literacy efforts after NTM-A/CSTC-A transfers the literacy program to the Ministries of Defense and Interior, the command has not yet delineated the stakeholders' commitments into a formal, coordinated strategy that identifies each organization's roles and responsibilities or established milestones for implementing those commitments. Having such a strategy in place early in the transfer process would help ensure that the literacy training program is successfully transferred to the ANSF and is sustainable in the long term. Failure to do so could place ANSF's ability to attain the level of literacy required to be an effective force at risk, and, consequently, put U.S. funds at risk of waste.

## RECOMMENDATIONS

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To improve the usefulness of literacy training program reporting and measures of progress toward achieving overall program goals, we recommend that the Commander of the International Security Assistance Force Joint Command, in conjunction with the U.S. Central Command's Joint Theater Support Contracting Command:

- 1. Establish program goals that are reasonable given the timeframes involved and ensure that progress toward achieving these goals is measurable.**
- 2. Revise the acquisition approach to include requirements for**
  - a. Independent verification of students' language capabilities upon literacy course completion and**
  - b. Contractor reporting that enables the MOD and MOI to track literacy levels within the ANSF.**

To improve the oversight of the literacy training contracts, we recommend that the Commander of the International Security Assistance Force Joint Command, in coordination with the U.S. Central Command's Joint Theater Support Contracting Command:

- 3. Limit, to the extent practicable, the number of classes offered at training locations that cannot be inspected by coalition forces or other quality assurance personnel, such as a quality assurance contractor.**
- 4. Enhance oversight of the new quality assurance contractor's performance by using coalition forces to conduct inspections at regional training centers and other locations.**
- 5. Modify the contracts to better define requirements for classes, including minimum class size and minimum number of hours taught in each class.**

To improve the likelihood of a successful transfer and sustainment of the literacy training program, we recommend that the Commander of the International Security Assistance Force Joint Command, in coordination with the Ministries of Defense, Interior, and Education; the United Nations Educational, Scientific, and Cultural Organization; and GIZ:

- 6. Develop and implement—by April 30, 2014—a formal transition and sustainment strategy for the literacy training program that**
  - a. contains goals and milestones and metrics to measure program outcomes;**
  - b. delineates the recent commitments and plans, such as the new train-the-trainer program, among all parties; and**
  - c. includes milestones for MOD and MOI to implement improvements needed to provide required literacy training to ANSF recruits.**

## AGENCY COMMENTS

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NTM-A, on behalf of the International Security Assistance Force Joint Command, provided written comments on a draft of this report, which along with our responses, are reproduced in appendix III.

NTM-A concurred with our recommendations to establish reasonable program goals and ensure that progress toward achieving those goals is measurable, revise the acquisition approach to include requirements for independent verification of student's language capabilities upon literacy course completion, limit the number of classes offered at training locations that cannot be inspected by coalition forces or other quality assurance personnel, and enhance oversight of the new quality assurance contractor's performance by using coalition forces to conduct inspections at regional training centers and other locations.

NTM-A did not, however, concur with our recommendation to modify the literacy contracts to better define requirements for classes, including minimum class size and minimum number of hours taught per month. We agree with NTM-A's point regarding the number of hours taught per month and have revised our recommendation to state that NTM-A should require the number of hours taught in each class. NTM-A stated that the command is responsible for ensuring all class requests meet internal minimum class size and minimum hours of instruction per month prior to approving the class request, and the contractor cannot mandate or solicit attendance. While we recognize that the contractors cannot mandate or solicit student attendance, we disagree that the modification is not required. The point of our recommendation was to ensure that the contracts are written in such a way that mitigates the risk that U.S. government funds will be wasted on payments to contractors for teaching multiple poorly-attended classes held for a few hours per week. In fact, NTM-A officials told us in October 2013 that the command was taking steps to eliminate "nonproductive" classes. One of these efforts, which the command implemented before that meeting, was to develop the internal program requirements for approving classes, including a requirement that classes meet at least 8 hours each week. These new internal program requirements would be strengthened if they were included in the contracts. As a result, we maintain that modifying contract requirements to correspond with the recently developed internal program requirements would enhance the command's oversight.

NTM-A partially concurred with our recommendation to revise the acquisition approach by requiring contractor reporting that supports tracking literacy levels within the ANSF. NTM-A stated that the contractors are required to report student progression to NTM-A, MOD, and MOI, but "it is not their duty to determine literacy levels or rates within the ANSF." That duty, NTM-A states, "falls squarely on the ANSF." Although we agree that the responsibility for determining literacy levels lies with the ANSF, we maintain that the contractors should provide NTM-A, MOD, and MOI with reporting that enables them to track literacy levels. As we found, the contractors' current reporting does not link the names and military identification numbers of students listed on class rosters with course graduation rosters and their assigned units' personnel lists, which would better enable the

ministries to track students after they complete the training and join their assigned units. Our recommendation did not state that the contractors should track literacy levels within the ANSF. Rather, we recommended that the contractors' reporting "support" this tracking effort. We have revised the recommendation to show more clearly that it is the responsibility of the MOI and MOD to track literacy levels.

Lastly, NTM-A partially concurred with our recommendation to develop and implement, by January 31, 2014, a formal transition and sustainment strategy for the literacy training program, to include milestones for MOD and MOI to implement improvements needed to provide required literacy training to ANSF recruits. Although NTM-A agreed that a formal transition and sustainment strategy is needed, the command stated that it would be more reasonable to develop such a strategy after Afghanistan's national elections. NTM-A stated that MOD and MOI leadership is currently not focused on establishing a comprehensive transition plan, but that NTM-A will continue to press the issue and advise the ANSF to take the lead in determining its future literacy requirements. Given the timing of this audit report and Afghanistan's national elections, we agree that more time is needed for NTM-A to work with MOD and MOI to develop a transition and sustainment strategy. Accordingly, we have revised the timeframe for developing it to April 30, 2014.

The U.S. Central Command Joint Theater Support Contracting Command also provided comments to the draft of this report, which are reproduced in appendix IV. The command concurred with the five recommendations directed to it, but stressed that it will take these actions as requested by NTM-A/CSTC-A.

## APPENDIX I - SCOPE AND METHODOLOGY

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This report provides the results of SIGAR's audit of the Department of Defense's contracts to provide literacy training to Afghan National Security Forces (ANSF) personnel throughout Afghanistan. Our objectives were to assess the extent to which (1) the North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan's (NTM-A/CSTC-A) literacy training was meeting goals for improving literacy within the ANSF, (2) NTM-A/CSTC-A has provided effective contract oversight, and (3) NTM-A/CSTC-A has taken steps to transfer and sustain the training program. We examined three literacy training contracts awarded and administered by the Joint Theater Support Contracting Command's General Support Contracting Command in Afghanistan to OT Training Solutions (OTTS; W91B4M-10-D-4011), with the Higher Education Institute of Karwan (HEIK; W91B4M-10-D-4010), and Insight Group (W91B4M-10-D-4009). We also conducted a limited review of a fourth GSCC contract with EUREKA Research (W91B4M-11-C-0001) to provide quality assurance for the three training contracts.

To assess the extent to which NTM-A/CSTC-A's literacy training was meeting goals for improving literacy within the ANSF, we analyzed NTM-A/CSTC-A's *ANSF Literacy Training – A Strategy For Transition* and *ANSF Literacy Training Transition Framework* for 2012, and the command's internal review of the literacy program. We also analyzed the Department of Defense's July 2013 *Report on Progress Toward Security and Stability in Afghanistan*. We reviewed relevant sections and clauses of the Federal Acquisition Regulation (FAR)<sup>38</sup> and U.S. Army contracting regulations.<sup>39</sup> We reviewed contracting officer's representative monthly reports and EUREKA Research quality assurance reports (to include results of the literacy training program, vetting processes for instructors, and quality assurance plans). In addition, we analyzed Regional Support Command and coalition force site inspection reports, which contained such information as reports on instructor attendance, training aides, and teaching abilities. Although we did not use the results of our reviews of the contracting officer's representative's quality assurance and site inspection reports to make projections, the analysis showed the extent to which quality assurance oversight was conducted, documented, and reported. We also reviewed various OTTS, HEIK, and Insight Group documents, including quality control plans, site inspection reports, training instructor qualifications, and training results. We reviewed instructors' lists provided to the Ministry of Education. We conducted site visits to six ANSF locations:

- Kabul Military Training Center, Darulaman Literacy Center, and Afghan National Police Zone 101 headquarters in Kabul
- Lashkar Gah Regional Training Center and Camp Shorabak Regional Military Training Center in Helmand province
- Camp Shaheen Regional Military Training Center in Balkh province

We considered several factors when choosing locations to visit: size, level of training provided, and relative importance of the training location; balance of coverage between Afghan National Army (ANA) and Afghan National Police (ANP) training locations; and security conditions and availability of agency assets to support the visits. During each visit, we observed literacy training classes being conducted and classroom conditions, and examined training schedules and class rosters, and met with ANSF, contractor, and coalition military personnel at the location. In addition, we interviewed officials from NTM-A/CSTC-A's Literacy Branch, the contracting officer and contracting officer's representative for the contracts. We also interviewed EUREKA Research quality assurance officials, the contractors' quality control representatives, site training managers, and instructors. We also interviewed NTM-A/CSTC-A's Deputy Commanders for Army and Police.

To assess the extent to which NTM-A/CSTC-A effectively oversaw the contracts, we analyzed the three literacy training contracts provided to OTTS, HEIK, and Insight Group, associated task orders, and modifications. We reviewed acquisition strategies and other documents developed during the contract planning pre-award phase

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<sup>38</sup> FAR 4.10, 16.5, Part 37, Subpart 46.4.

<sup>39</sup> Army Regulation 70-13.



of the current and proposed contracts, and examined relevant sections and clauses of the FAR and U.S. Army contracting regulations on the management and oversight of service contracts.<sup>40</sup> We also reviewed prior audits of contract oversight and ANSF training, including the U.S. Government Accountability Office's *Framework for Assessing the Acquisition Function at Federal Agencies*.<sup>41</sup> We reviewed NTM-A/CSTC-A's processes for approving new training classes and paying contractor invoices. In assessing the internal controls associated with the contracts, we reviewed the contracting officer's representative guidance for reviewing and approving contractor invoices, and we reviewed available invoices.<sup>42</sup> In addition, we obtained information on contract obligations and expenditures from the Defense Finance and Accounting Services. We also interviewed officials from NTM-A/CSTC-A's Literacy Branch, the Deputy Commander-Army and Deputy Commander-Police, the Joint Theater Support Contracting Command's General Support Contracting Command's contracting officer, officials from the Regional Commands-Capital and North, and officials from the Regional Support Command-Southwest.

To assess the extent to which NTM-A/CSTC-A has taken steps to transfer and sustain the training program, we analyzed NTM-A/CSTC-A's *ANSF Literacy Training – A Strategy For Transition and Literacy Training Transition Framework for 2012*, the Department of Defense's July 2013 *Report on Progress Toward Security and Stability in Afghanistan*, and other documents focusing on oversight and sustainment. In addition, we reviewed the command's internal reviews, reports, briefings, and documentation addressing status of and plans for the literacy program. We also examined reports on NTM-A/CSTC-A's train-the-trainer program and its agreements with the Afghan Ministries of Defense and Interior. Further, we obtained documents describing these ministries' plans to extend the training program to include an additional 8 weeks of literacy instructions. We interviewed officials from NTM-A/CSTC-A's Literacy Branch and the Deputy Commanders for Army and Police and the United Nations Educational, Scientific, and Cultural Organization. We also interviewed officials from the Ministry of Education's Literacy Center, the Ministry of Defense's Religious and Cultural Affairs Office and ANA Training Command, and the Ministry of Interior's ANP Training General Command. We also met with ANA and ANP training center commanders.

We did not use computer-processed data for the purposes of the audit objectives. With respect to assessing internal controls, we reviewed NTM-A/CSTC-A's and the Joint Theater Support Contracting Command's General Support Contracting Command's compliance with the FAR and U.S. Army contracting regulations as part of our first and second objectives. The results of our assessment are included in the body of this report.

We conducted work in Washington, D.C., and Kabul, Helmand, and Balkh provinces in Afghanistan from November 2012 to January 2014, in accordance with generally accepted government auditing standards. These 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted by the Office of the Special Inspector General for Afghanistan Reconstruction under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended.

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<sup>40</sup> FAR 46.102 and Subpart 46.4; Army Regulation 70-13.

<sup>41</sup> U.S. Government Accountability Office, *Interagency Collaboration: Key Issues for Congressional Oversight of National Security Strategies, Organizations, Workforce, and Information Sharing*, GAO-09-904SP, September 25, 2009; U.S. Government Accountability Office, *Framework for Assessing the Acquisition Function at Federal Agencies*, GAO-05-218G, September 1, 2005; and the Department of Defense Office of Inspector General, *DoD Needs to Improve Vocational Training Efforts to Develop the Afghan National Security Forces Infrastructure Maintenance Capabilities*, DODIG-2012-104, June 18, 2012.

<sup>42</sup> According to the contracting officer, much of the supporting documentation for the three literacy training contracts had been sent from Afghanistan to the U.S. Army Contracting Command in Rock Island, Illinois, for storage. This documentation was not available for our review during the course of our field work, nor was it available to support the contracting officer's assessments of contractor performance.

## APPENDIX II - COMMITMENTS TO THE TRANSFER AND SUSTAINMENT OF THE ANSF LITERACY TRAINING PROGRAM

Table 2 lists the stakeholders, their commitments to the Afghan National Security Force (ANSF) literacy training program, and projected timeframes for implementing the commitments.

**Table 2 - Stakeholder Commitments to ANSF in Literacy Training Transfer and Sustainment**

Stakeholder	Commitment	Timeframe of Efforts
<b>North Atlantic Treaty Organization Training Mission-Afghanistan/Combined Security Transition Command-Afghanistan (NTM-A/CSTC-A)</b>	<ul style="list-style-type: none"> <li>Continue classes being conducted under the three literacy training contracts at a reduced numbers of locations</li> <li>Award a new contract to add the train-the-trainer capability                             <ul style="list-style-type: none"> <li>Train 1,500 Afghan National Army (ANA) literacy instructors, at least one in each ANA company, and for the five Regional Military Training Centers, Kabul Military Training Center, and Darulaman Literacy Center</li> <li>Train 1,000 ANP literacy instructors</li> </ul> </li> <li>Award a new quality assurance contract for oversight of the literacy training contracts</li> </ul>	<ul style="list-style-type: none"> <li>Train-the-trainer program began in November 2013 for both ANA and ANP</li> <li>ANA training to occur in the five Regional Military Training Centers and Kabul Military Training Center or Darulaman Literacy Center</li> <li>ANP training to occur in the 12 Regional Training Centers</li> <li>All 2,500 instructors trained by December 31, 2014</li> </ul>
<b>Regional Support Command-South</b>	<ul style="list-style-type: none"> <li>Fund supplies and other support for its local train-the-trainer program</li> <li>Provide a limited number of train-the-trainer graduates in support of NTM-A/CSTC-A's contracted train-the-trainer program</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>
<b>Deutsche Gesellschaft für Internationale Zusammenarbeit</b>	<ul style="list-style-type: none"> <li>Provide and modify the train-the-trainer curriculum for NTM-A/CSTC-A</li> <li>Expand the scope of literacy training beyond the current nine provinces in northern Afghanistan</li> <li>Assume responsibility from NTM-A/CSTC-A for various literacy classes as NTM-A/CSTC-A reduces the scope of its program</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> <li>Deutsche Gesellschaft für Internationale Zusammenarbeit began assuming responsibility for most of NTM-A/CSTC-A's literacy classes for the Afghan National Police (ANP) in July 2013.</li> </ul>
<b>United Nations Educational, Scientific, and Cultural Organization</b>	<ul style="list-style-type: none"> <li>Train 500 ANP personnel to become literacy instructors at ANP fielded units and training centers</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing under the Literacy for Empowering Afghan Police program</li> </ul>
<b>Ministry of Defense</b>	<ul style="list-style-type: none"> <li>Provide 1,500 soldiers for NTM-A/CSTC-A's train-the-trainer program</li> <li>Extend initial recruit training to 16 weeks for illiterate recruits, consisting of an 8-week basic training plus 8-week literacy instruction at Levels 1 through 3</li> </ul>	<ul style="list-style-type: none"> <li>All 1,500 ANA instructors trained by December 31, 2014</li> </ul>
<b>Ministry of Interior</b>	<ul style="list-style-type: none"> <li>Provide 1,500 policemen for NTM-A/CSTC-A's train-the-trainer program</li> <li>Extend initial recruit training to 16 weeks with Level 1 through 3 instruction included</li> <li>Implement literacy training for the Afghan Local Police</li> </ul>	<ul style="list-style-type: none"> <li>All 1,500 ANP instructors trained by December 31, 2014</li> </ul>

**Table 2 - Stakeholder Commitments to ANSF in Literacy Training Transfer and Sustainment**

Stakeholder	Commitment	Timeframe of Efforts
<b>Ministry of Education</b>	<ul style="list-style-type: none"><li>• Evaluate and approve literacy training curriculum</li><li>• Evaluate the effectiveness of the program after 6 months</li><li>• Update the train-the-trainer program of instruction</li><li>• Certify the results of ANSF literacy training</li></ul>	• Ongoing

Source: SIGAR analysis of NTM-A/CSTC-A documents.

## APPENDIX III - COMMENTS FROM NATO TRAINING MISSION-AFGHANISTAN



HEADQUARTERS  
NATO TRAINING MISSION – AFGHANISTAN  
KABUL, AFGHANISTAN  
APO, AE 09356

FROM: NTM-A/CC

TO: IJC/CC

SUBJECT: Special Inspector General of Afghanistan Reconstruction (SIGAR) Dari/Pashto Literacy Training Report—December 2013

BLUF: SIGAR issued a draft report regarding NTM-A CJ7 Dari/Pashto literacy training with six recommendations. These six recommendations are intended to improve the usefulness of literacy training program reporting and measures of progress toward achieving overall program goals. They also seek to strengthen the oversight of the three ongoing literacy training contracts and the new quality assurance contract. Lastly these recommendations intend to increase the likelihood of a successful transfer and sustainment of the literacy training program by developing and implementing a formal, coordinated transition and sustainment strategy.

1. Establish program goals that are reasonable given the timeframes involved and ensure that progress toward achieving these goals is measurable. CONCUR

NTM-A has recently issued new goals for the literacy program:

1. Train/graduate 30,000 ANSF members to level 3 within the next 12 months (end of 2014). If achieved, this program, since its inception in late 2009, will have trained/graduated over 100,000 ANSF members to level 3.
2. Train/graduate 2,500 ANSF members through the “train-the-trainer” program. This will provide the ANSF an organic capability to provide literacy instruction.
3. Final goal is to transition a “turn-key” literacy program to the MoD/MoI at the end of 2014.

A huge step in this last effort was to restructure the task orders to focus on more concrete deliverable CLINs (AA-level 1 plan of instruction, AB-level 2 plan of instruction, AC-level 3 plan of instruction, AD-levels 1-3 plans of instruction, AH-recruit placement test) rather than the AE CLIN (teach monthly) which was an avenue for waste as there was no deliverable other than to teach during the month.

Additionally, this AE CLIN was paid each month. Now, classes via the AA, AB, AC, and AD CLINs will be paid once their respective plans of instructions are taught/delivered.

ANSF leadership holds a critical piece to ensure these goals are met, namely, to task/send their personnel to attend classes and ensure those they send are not absent. NTM-A has had issues with absenteeism in the past. The new task orders and assessment reports from the oversight assistance contractor/monitors will better equip NTM-A to justify classes request approvals, deal with absenteeism and raise class fill rates.

2. Revise the acquisition approach to include requirements for:

- a. Independent verification of student’s language capabilities upon literacy course completion.  
**CONCUR**

Program manager will direct contractors to have a different instructor that didn't train the class proctor to score end of phase test. However, there is no need to modify the contracts to direct this program change. Additionally, NTM-A with assistance with ISAF's Non-security Ministry Advisory Group, will engage the Ministry of Education (MoE) to explore options wherein MoE can proctor tests.

- b. Contractor reporting that supports tracking of literacy levels within the ANSF. **PARTIALLY CONCUR**

See SIGAR comment 1.

The new approach for the task orders focuses on more concrete deliverables that are tied to plans of instructions for the literacy levels. The instructors will need to ensure students moving from AA to AB then on to AC classes are tracked to limit duplication of training efforts. However, there are significant limitations within the ANSF to differentiate and track individuals. Additionally, it is outside the scope of the contractor's responsibilities to be a personnel shop for the ANSF. The contractors, IAW the Performance Work Statement para 1.7.1, report student progression to NTM-A and MoD/MoI but it is not their duty to determine literacy levels or rates within the ANSF. That duty falls squarely on the ANSF.

3. Limit, to the extent practicable, the number of classes offered at training locations that cannot be inspected by Coalition Forces or other quality assurance personnel, such as a quality assurance contractor. **CONCUR**

NTM-A's internal quality controls only allows new classes to start at sites where there are currently classes being conducted or at locations that have coalition force presence.

4. Enhance oversight of the new quality assurance contractor's performance by using Coalition Forces to conduct inspections at regional training centers and other locations. **CONCUR**

NTM-A will continue to work with regional coalition force members to inspect classes in their AOR. NTM-A will work with IJC to explore possibilities to increase coalition inspection frequency.

5. Modify the contracts to better define requirements for classes, including minimum class size and minimum number of hours taught per month. **NON-CONCUR**

See SIGAR comment 2.

A modification of the contract is not required. The contract does provide an instructor to student ratio and directs instructor work-week hours. The breakdown for instruction is a forty-five (45) hour work week that incorporates instructional and laboratory hours five (5) days a week. (*PWS dated 24 Mar 13 par 1.4.2.2.*) The AA, AB, AC, AD, and AE CLIN structures dictates a +/-33 person class size. It is the responsibility of NTM-A to ensure all class request meet the internal minimum class size and minimum hours of instruction per month prior to approving the class requests. The contractor cannot mandate nor solicit attendance

6. Develop and implement-by January 31, 2014-a formal transition and sustainment strategy for the literacy training program that a) contains goals and milestones and metrics to measure program outcomes; b) delineates the recent commitments and plans, such as the new train-the-trainer program, among all parties, and; c) includes milestones for MOD and MOI to implement improvements needed to provide required literacy training to ANSF recruits. **PARTIALLY CONCUR.**

See SIGAR comment 3.

A formal transition and sustainment strategy is needed but will not be completed before 31 January 2014.

A more reasonable timeframe for these plans is after GIRA's national elections. NTM-A will focus on task development/implementation by 30 April 2014. This effort must be ANSF lead with NTM-A advising. Currently MoD and MoI senior leadership are not focused on establishing a comprehensive transition plan. Since they must determine future ANSF literacy requirements and will manage/execute any program their "buy-in" and participation is essential. NTM-A, via KLEs, will continue to press this issue.

7. My POCs for this matter are CDR Guillaume "Guido" Smitsmans (NLD) [REDACTED] and Maj Rhonda Simonis [REDACTED]  
[REDACTED]



D Milner  
Major-General (CAN)  
Commanding General

## SIGAR's Response to Comments from NATO Training Mission-Afghanistan

1. Although we agree that the responsibility for determining literacy levels lies with the ANSF, we maintain that the contractors should provide NTM-A, MOD, and MOI with reporting that enables them to track literacy levels. As we found, the contractors' current reporting does not link the names and military identification numbers of students listed on class rosters with course graduation rosters and their assigned units' personnel lists, which would better enable the ministries to track students after they complete the training and join their assigned units. Our recommendation did not state that the contractors should track literacy levels within the ANSF. Rather, we recommended that the contractors' reporting "support" this tracking effort. We have revised the recommendation to show more clearly that it is the responsibility of the MOI and MOD to track literacy levels.
2. NTM-A did not concur with our recommendation to modify the literacy contracts to better define requirements for classes, including minimum class size and minimum number of hours taught per month. We agree with NTM-A's point regarding the number of hours taught per month and have revised our recommendation to state that NTM-A should require the number of hours taught in each class. NTM-A stated that the command is responsible for ensuring all class requests meet internal minimum class size and minimum hours of instruction per month prior to approving the class request, and the contractor cannot mandate or solicit attendance. While we recognize that the contractors cannot mandate or solicit student attendance, we disagree that the modification is not required. The point of our recommendation was to ensure that the contracts are written in such a way to mitigate the risk that U.S. government funds will be wasted on payments to contractors for teaching multiple poorly-attended classes held for a few hours per week. In fact, NTM-A officials told us in October 2013 that the command was taking steps to eliminate "nonproductive" classes. One of these efforts, which the command implemented before that meeting, was to develop the internal program requirements for approving classes, including a requirement that classes meet at least 8 hours each week. These new internal program requirements would be strengthened if they were included in the contracts. As a result, we maintain that modifying contract requirements to correspond with the recently developed internal program requirements would better enhance the command's oversight.
3. Given the timing of this audit report and Afghanistan's national elections, we agree that more time is needed for NTM-A to work with MOD and MOI to develop a transition and sustainment strategy. Accordingly, we have revised the timeframe for developing it to April 30, 2014.

# APPENDIX IV - COMMENTS FROM U.S. CENTRAL COMMAND JOINT THEATER SUPPORT CONTRACTING COMMAND



REPLY TO  
ATTENTION OF

**HEADQUARTERS**  
CENTCOM JOINT THEATER SUPPORT CONTRACTING COMMAND  
CAMP PHOENIX, AFGHANISTAN  
APO AE 09320



C-JTSCC/CG

15 January 2014

MEMORANDUM THRU U.S. Central Command (CENTCOM), CCIIG External Audits  
(Attn: Mr. Jim Smart), MacDill AFB, FL

FOR Office of the Special Inspector General for Afghanistan Reconstruction (SIGAR),  
1550 Crystal Drive, Suite 900 (Attn: Ms. Gabriele Tonsil), Arlington, VA 22202

SUBJECT: Response to Draft SIGAR 14-XX Audit Report – “Afghan National Security  
Forces: Despite Reported Successes, Concerns Remain about Literacy Program  
Results, Contract Oversight, Transition, and Sustainment”

1. C-JTSCC provides the following responses to the subject draft report:

a. Recommendation (1). *Establish program goals that are reasonable given the  
timeframes involved and ensure that progress toward achieving these goals is  
measurable.*

**Response: Concur with comments.** C-JTSCC will incorporate recommended  
changes as requested by NATO Training Mission – Afghanistan/Combined Security  
Transition Command - Afghanistan (NTM-A/CSTC-A). NTM-A/CSTC-A is responsible  
for establishing program goals that are reasonable and in ensuring that progress toward  
achieving such goals is measurable.

b. Recommendation (2)a. *Revise the acquisition approach to include requirements  
for independent verification of students' language capabilities upon literacy course  
completion.*

**Response: Concur with comments.** C-JTSCC will revise the acquisition  
approach as requested by NTM-A/CSTC-A. NTM-A/CSTC-A is responsible for  
establishing requirements for independent verification of students' language capabilities  
upon literacy course completion.

c. Recommendation (2)b. *Revise the acquisition approach to include requirements  
for contractor reporting that supports tracking of literacy levels within the ANSF.*

**Response: Concur with comments.** C-JTSCC will work with NTM-A/CSTC-A to  
ensure requirements identified in the contracts are accurate and reflect the current  
needs of the literacy program. NTM-A/CSTC-A is responsible for establishing program  
goals that are reasonable.

d. Recommendation (3). *Limit, to the extent practicable, the number of classes  
offered at training locations that cannot be inspected by Coalition Forces or other quality  
assurance personnel, such as a quality assurance contractor.*



CJTSCC-CG

SUBJECT: Response to Draft SIGAR 14-XX Audit Report – “Afghan National Security Forces: Despite Reported Successes, Concerns Remain about Literacy Program Results, Contract Oversight, Transition, and Sustainment”

**Response: Concur with comments.** C-JTSCC will implement in scope changes to the existing contracts as requested by NTM-A/CSTC-A. C-JTSCC is committed to ensuring that the government monitors contractor performance to ensure performance meets defined contract requirements. NTM-A/CSTC-A is responsible for defining class requirements – to include establishing the number of classes offered at training locations that cannot be inspected by Coalition Forces or other quality assurance personnel, such as a quality assurance contractor.

e. Recommendation (4). *Enhance oversight of the new quality assurance contractor's performance by using Coalition Forces to conduct inspections at regional training centers and other locations.*

**Response: Concur with comments.** C-JTSCC will work with NTM-A/CSTC-A to appoint CORs that are trained and qualified to perform the function. NTM-A/CSTC-A is responsible for identifying individuals to perform Contracting Officer's Representative (COR) functions under the contract.

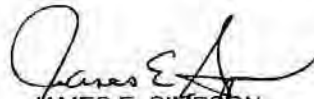
f. Recommendation (5). *Modify the contracts to better define requirements for classes, including minimum class sizes and minimum number of hours taught per month.*

**Response: Concur with comments.** C-JTSCC will implement in scope changes to existing contracts that are requested by NTM-A/CSTC-A. NTM-A/CSTC-A is responsible for better defining requirements for classes, including minimum class sizes and minimum number of hours taught per month.

g. Recommendation (6). *Develop and implement – by January 31, 2014 – a formal transition and sustainment strategy for the literacy program that: a. contains goals and milestones and metrics to measure program outcomes; b. delineates the recent commitments and plans, such as the new train-the-trainer program, among all parties; and c. Includes milestones for MOD and MOI to implement improvements needed to provide required literacy training to ANSF recruits.*

**Response: No response provided.** Recommendation directed to the Commander of the International Security Assistance Force Joint Command.

2. My point of contact for this action is Ms. Peggy Corcoran, Audits and Oversight,  
[REDACTED]

  
JAMES E. SIMPSON  
Brigadier General, USA  
Commanding

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## APPENDIX V - ACKNOWLEDGMENTS

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under project code SIGAR-072A.

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