

SIGAR

**Special Inspector General for
Afghanistan Reconstruction**

Improvised Explosive Devices: Unclear Whether Culvert Denial Systems to Protect Troops Are Functioning or Were Ever Installed

This product was completed under SIGAR's Office of Special Projects, the Special Inspector General's response team created to examine emerging issues in prompt, actionable reports to federal agencies and the Congress. The work was conducted pursuant to the Special Inspector General's authorities and responsibilities under the National Defense Authorization Act for FY 2008 (P.L. 110-181).



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General Lloyd J. Austin III
Commander, U.S. Central Command

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Improvised explosive devices (IEDs) are the weapon of choice for threat networks, and there has been an increasing trend in the use of IEDs in Afghanistan. IED events in Afghanistan increased by 42 percent (9,300 to 16,000) from 2009 to 2011, according to Department of Defense (DOD) testimony before the House Appropriations Subcommittee on Defense.¹ According to DOD officials, the number of IED events reportedly increased in 2012 to a total of over 17,000 incidents for the year. Culvert denial systems are designed to prevent access to roadway culverts by insurgents, who can use the culverts to emplace IEDs or other explosives. DOD has funded a number of contracts for the placement of culvert denial systems across Afghanistan.

In October 2012, SIGAR issued a safety alert letter informing DOD of the results of our preliminary investigation, which found that Afghan contractors either had failed to properly install culvert denial systems, rendering those systems ineffective and susceptible to compromise by insurgents, or did not install them at all. Our preliminary investigation found that at least two Afghan contractors—with a total contract amount of nearly \$1 million—in one Afghanistan province have committed fraud by billing the U.S. government for the installation of 250 culvert denial systems that were either never installed or incorrectly installed. The ongoing investigation is looking into whether this apparent failure to perform may have been a factor in the death or injury of several U.S. soldiers. To date, an Afghan contractor and his sub-contractor have both been arrested and charged with fraud and negligent homicide. Our investigators are working with the Afghan Attorney General's Office to arrest the second contractor.

We initiated this review in response to the concerns identified in our safety alert letter. We sought to identify the universe of contracts awarded for culvert denial system installation, and the extent to which contract management and oversight were conducted. This report provides our findings on (1) the number of contracts that have been awarded by DOD for culvert denial systems and (2) the extent to which contract oversight was conducted by DOD.

To conduct this review, we relied on data and documents provided by U.S. Forces-Afghanistan (USFOR-A), U.S. Central Command's Joint Theater Support Contracting Command (C-JTSCC) including their subordinate Regional Contracting Commands (RCCs), Combined Joint Task Force-Paladin, Combined Joint Task Force-1 (CJTF-1) in Regional Command-East (RC-E), Combined Joint Task Force 3 (CJTF-3) in Regional Command-South (RC-S), and personnel at the Kandahar Provincial Reconstruction Team (KPRT). We also conducted interviews of personnel from the commands listed above, and we reviewed and analyzed a sample of culvert denial system contract files in Afghanistan. This review did not include an assessment of culvert denial systems that

¹ *United States Army - Joint Improvised Explosive Device Defeat Organization, Before the U.S. House of Representatives Committee on Appropriations, Subcommittee on Defense, 113th Cong. (September 20, 2012) (Statement by Lieutenant General Michael D. Barbero, Director, Joint Improvised Explosive Device Defeat Organization U.S. Department of Defense).*

were part of road projects funded by the U.S. Army Corps of Engineers or the U.S. Agency for International Development.

Background

Culverts under roads and embankments have been used by insurgents to conceal IEDs and other bulk explosive devices. A culvert denial system is typically a grating fabricated from reinforcing bar (rebar) that covers the opening of a culvert and is embedded in concrete. Although sizes of culverts can vary, there are specifications for culvert denial systems, including how wide the openings between the rebar can be, as well as the type of rebar and concrete that must be used. These systems are constructed and installed by a contractor, constructed and installed by military personnel, or constructed by a contractor and installed by military personnel.

Photos: Examples of Culvert Denial Systems



Source: C-JTSCC contract files.

The installation of culvert denial systems is often included as a requirement in a road construction contract. Contracts exclusively for the installation of culvert denial systems and requirements for the installation of such systems within larger road construction contracts usually have a requirement for multiple culvert denial systems to be installed. The locations for the installation of these systems are written into the contract in one of three ways, as

1. specific Military Grid Reference System (MGRS) coordinates for each location;²
2. a latitude and longitude reference for each location; or
3. a starting location along a route or highway, either in MGRS or latitude and longitude, and an end location, with instructions to cover all the culverts between those two points.³

² The MGRS is an alphanumeric version of a numerical Universal Transverse Mercator (UTM) or Universal Polar Stereographic (UPS) grid coordinate.

³ This type of contract is referred to as a point-to-point contract.

The Universe of Contracts and Total Amount of Money Spent on Culvert Denial Systems Cannot be Determined

We were unable to determine the total number of contracts awarded for the construction and installation of culvert denial systems due, in large part, to the various ways that these systems are contracted for and installed in Afghanistan. Requirements for culvert denial systems are generated in a decentralized way by various military units around Afghanistan based on the need and threat level in their area. Further, once a requirement for a culvert denial system has been identified, the contract can be awarded and administered through a number of entities or organizations—from the unit that identified the requirement to the larger contracting commands. As a result, we found that there is a fragmented understanding of and a lack of visibility into the universe of contracts for these systems among DOD’s military and civilian contracting officials in Afghanistan. In addition to the difficulty in identifying which military units or commands may have awarded culvert denial systems contracts, we cannot be sure that we have exhausted all search terms to identify these contracts in contract databases due to the various terms used to denote culvert denial systems, such as trash racks, gratings, and culvert covers. Based on our review of the contracts identified by SIGAR and DOD officials, DOD personnel have largely awarded contracts in Afghanistan that include culvert denial systems using Commander’s Emergency Response Program (CERP) and operation and maintenance funds, though U.S. troops have also installed some of these systems themselves.⁴

Since 2009, DOD has awarded contracts worth approximately \$32 million for a variety of requirements, some of which include the installation of culvert denial systems. From our review of these contracts, we identified at least 2500 specific grid points where culvert denial systems were supposed to be installed, though with the lack of quality assurance/quality control (QA/QC) documentation in the contract files, it is not clear how many of those culvert denial systems were actually completed. From contract data that we had access to, the price of a culvert denial system can vary based on type, size, and location. The price of a culvert denial system was found to vary from a low of \$800 to as much as \$6,500.

Most of the contracts for culvert denial systems that we were able to identify were awarded in the eastern and southern part of the country due to the relatively large concentration of U.S. troops in those two Regional Commands (RC); the kinetic nature of those regions; and the tactics, techniques, and procedures of the insurgents operating in those areas.

CERP contracts were particularly difficult to identify, and we could not be certain that we captured all culvert denial systems that were installed using CERP funds. While some CERP contracts were exclusively for the construction of culvert denial systems, there were also culvert denial system requirements as part of larger road repair contracts. In addition, we were told by the CERP manager in Regional Command-North that, in at least two cases, there are ongoing culvert denial systems projects funded by bulk CERP funds.⁵ If a culvert denial system is paid for with bulk CERP funds, it is particularly difficult to identify in the Combined Information Data Network Exchange (CIDNE) because CIDNE does not allow searches for the individual projects funded under bulk CERP.⁶

⁴ The CERP program enables U.S. commanders in Afghanistan to carry out small-scale projects designed to meet urgent humanitarian relief requirements or urgent reconstruction requirements within their area of operations.

⁵ CERP guidance allows Commanders to utilize advance bulk CERP funds to expedite the execution of small-scale CERP projects under \$5,000 for an individual project or, in specific cases, up to \$10,000 when the senior U.S. commander in the Regional Command in Afghanistan approves the project.

⁶ All CERP projects are required to be properly documented and continually monitored and maintained in the Combined Information Data Network Exchange database to include the uploading of complete project files.

Contract Files Generally Had Insufficient Documentation to Demonstrate That Culvert Denial Systems Were Installed

The contract files that we reviewed for the culvert denial systems contracts implemented under CERP and the C-JTSCC generally did not have sufficient documentation to demonstrate that QA/QC had been performed for the contracts. We reviewed files for 19 of the 39 completed CERP contracts that had a culvert denial system requirement and 10 of the 15 C-JTSCC contracts that had requirements for culvert denial systems. A majority of the contract files that we reviewed had insufficient documentation to determine whether QA/QC had been performed systematically throughout the course of the project. As a result, we were not able to determine if steps were taken to perform QA/QC on the contract. Without proper documentation to demonstrate that QA/QC steps were taken, there is little information in the files to show that culvert denial systems were ever properly installed or installed at all.

USFOR-A guidance for the CERP program, outlined in the document “*Money as a Weapons System-Afghanistan*” (MAAWS-A), requires that the completed project file be uploaded and kept in the CIDNE.⁷ Since December 2009, MAAWS-A has required that blueprints, drawings, maps, and photos be included in the CIDNE file. In addition, many of the CERP contracts we reviewed require that the contractor submit, as proof of work completed, either photographs with a grid location or a description of the culvert denial system installed along with the grid point. However, sufficient documentation that this information was ever received by the contracting officer’s representative (COR) does not exist in CIDNE for the majority of the CERP projects that we reviewed. We found either partial or no evidence that this contractual requirement was met for the majority of the contract files maintained in CIDNE.

Guidance outlined in the *Defense Contingency Contracting Handbook* states that the COR will periodically inspect, carefully monitor, and keep the contracting officer informed of contractor performance on the technical requirements of the contract. The COR is also required to promptly inspect the supplies and services delivered to determine their acceptability or, in other words, ensure that the government receives the supplies or services for which it is paying. This includes a requirement that the COR document contractor performance, review and evaluate progress reports, review invoices, and perform site visits. We found that most of the 15 C-JTSCC contract files did not contain QA/QC documentation, such as pictures with grid points or evidence of COR site visits. Specifically, for 5 of the contract files, no evidence of QA/QC existed; for 3 of the contract files, some evidence of QA/QC existed, though not significant; and for 2 contract files, we found that there was documentation that a significant amount of QA/QC had been performed.⁸ We did not review the remaining 5 contract files, which are now at Rock Island Contracting Command (RICC).

Conclusion

There is insufficient evidence to show that culvert denial systems paid for with U.S. government funds were ever installed or, if they were, that the systems were installed properly. The lack of visibility of where culvert denial systems were installed throughout Afghanistan and the cost of these systems resulted from (1) the fragmented nature of how requirements were generated for culvert denial system contracts, (2) how the contracts were awarded by multiple commands at various organizational levels, and (3) the fact that U.S. troops also constructed and installed the systems. In addition, the lack of complete contract files demonstrated significant problems with QA/QC. Given the risk of culverts being used to emplace IEDs as a

⁷ See “Money as a Weapon System Afghanistan” (MAAWS-A), USFOR-A Pub 1-06, Commander’s Emergency Response Program (CERP) SOP, updated March 2012.

⁸ We made a determination about the level of QA/QC performed based on the number of photos in the contract files as well as other evidence of QA/QC performed such as progress updates, records of site visits, etc.

tactic to target U.S. forces, SIGAR has serious concerns that the lack of contract oversight resulted in the U.S. government not getting what it paid for and that the risk to U.S. troops was not adequately mitigated. Finally, it is important to know where culvert denial systems have been installed and what condition they are in to prevent any further loss of life from the placement of IEDs in roadside culverts.

Recommendations

In order to ensure that active or future contracts that include a requirement for culvert denial systems have the proper contract management and oversight, we recommend to the Commanders of USFOR-A and C-JTSCC:

1. Ensure that specific requirements are included in all contracts for QA/QC to be performed and that this QA/QC documentation be reviewed by the appropriate technical experts in order to ensure the quality of the culvert denial systems installed;
2. Ensure that contracting officials are performing the required QA/QC for culvert denial systems requirements prior to making payments; and
3. Ensure actions are taken to identify, to the extent possible, the locations of culvert denial systems throughout Afghanistan.

Agency Comments

We provided a draft of this report to U.S. Central Command for review and comment. C-JTSCC and the International Security Assistance Force Joint Command (IJC) provided comments, which are reproduced in appendices III and IV, respectively. According to U.S. Central Command, IJC responded to the recommendations on behalf of USFOR-A because it will be the command authority responsible for directing the actions needed to implement these recommendations. Both C-JTSCC and IJC concurred with the three recommendations.

C-JTSCC notes a number of actions it has taken or plans to take to improve the quality of contract oversight. These actions include the recent hiring of a QA tech director and team of QA specialists who will be responsible for establishing a program to improve oversight of contract QA requirements. These specialists will be responsible for providing technical assistance to contracting officers, with an emphasis on high-visibility contracts such as those for culvert denial systems. In addition, C-JTSCC stated that it issued a recent policy that addresses the preparation of QA surveillance plans, maintenance of government records, and COR training and technical assistance. In response to our third recommendation, C-JTSCC requested an additional 30 days in order to assemble and review all records associated with culvert denial contracts that have been awarded by the RCCs in order to identify locations of culvert denial systems throughout theater. We believe this is a reasonable amount of time and supports the action C-JTSCC will take to identify the location of culvert denial systems installed throughout Afghanistan.

IJC emphasizes in its comments that, due to the drawdown of Coalition Forces over the coming months and years, alternative measures may have to be employed in order to inspect and identify locations of culvert denial systems. We agree that alternative measures, such as aerial observation, may be needed to provide for sufficient contract oversight. However, we believe that a lack of resources does not excuse poor oversight, nor does it relieve DOD contracting officials from their responsibilities to ensure that the terms of the contract are met. It is simply not acceptable to spend taxpayer money on a contract when the contracting officer has no way to verify that the contract has been fulfilled.

This product was completed under SIGAR's Office of Special Projects, the SIGAR response team created to examine emerging issues in prompt, actionable reports to federal agencies and the Congress. The work was conducted under the authority of Public Law 110-181, as amended, the Inspector General Act of 1978, and the Inspector General Reform Act of 2008. Major contributors to this report were Melissa Hermes and John Schenk. Technical assistance was provided by Jim Amoroso, Kim Corthell, Pete Hughes, and Mable Stanford. Please contact my Director for Special Projects, Ms. Monica Brym, at Monica.j.brym.civ@mail.mil or 703-545-6003 if you have any questions or concerns regarding this work.

A handwritten signature in black ink, appearing to read 'John F. Sopko', with a long horizontal flourish extending to the right.

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

APPENDIX I - COMMANDER'S EMERGENCY RESPONSE PROGRAM CONTRACT DATA

The Commander's Emergency Response Program (CERP) is the funding source for at least 39 contracts for culvert denial systems that have been completed. Of those 39 contracts, 19 were completed in Regional Command-South (RC-S), 17 were completed in Regional Command-East (RC-E), and 3 were completed in Regional Command-North (RC-N). The total estimated amount of the awards for these contracts is approximately \$7.5 million.⁹

We chose a judgmental sample of 19 of the original 39 contracts. We chose at least one project in each Regional Command where a completed project had been identified. We also tried to choose a sample of projects that would provide a range in terms of the number of culvert denial systems required within the contract. We were unable to fully determine or confirm the grid points where culvert denial systems were installed or even the total number of systems installed through CERP. CERP officials from the U.S. Forces-Afghanistan's Civil Affairs office did tell us that it was reasonable to assume that the grid points listed in the Afghan Development Reports (ADR), which is a required document for a CERP project, are likely the best source of information on the locations where the U.S. government paid to have a culvert denial system installed.¹⁰ However, as shown in table 1, there are often many fewer grid points in the ADR than in the original contract. Given the amount of other data missing about these CERP projects, we believe it is likely that the grid locations listed in the ADR are not inclusive of all locations where the U.S. government paid for the installation of a culvert denial system.

For the purposes of this review, we did not focus on projects that had been terminated or were ongoing. It is, however, worth noting that some CERP projects were terminated due to (1) poor performance by the contractor, (2) lack of oversight by the military unit, and (3) lack of buy in from the local population. In at least four cases, the CIDNE report stated that the reason for termination was that operation and maintenance money needed to be used to complete the project instead of CERP funds. For one terminated CERP project that was directed to use operation and maintenance money, the CIDNE report stated that CERP could not be used because the construction of culvert denial systems would indirectly benefit U.S. or coalition troops in violation of CERP guidance. In addition, of the total projects that were terminated (not just those terminated because operations and maintenance funds had to be used instead of CERP), multiple projects had some work completed prior to termination, but we were unable to determine what percentage of work was completed. This was largely because invoices were generally paid out as progress payments for a percentage of work completed, but the invoices do not list the specific work that was completed.

In a January 2011 SIGAR audit report we noted that the data in CIDNE is unreliable.¹¹ Uploading media files, such as pictures, can be a time consuming or impossible task, especially in the field. Nevertheless, U.S. Army

⁹ Contracts may include more than just construction of culvert denial systems. These contracts sometimes include road construction or repair. The estimated award amount is the dollar figure for the entire contract, not just the construction of the culvert denial systems. Because contractors are paid by percentage of work completed and the invoices are not broken out by what specific work was actually completed, we could not determine exactly how much was paid for the culvert denial systems through CERP.

¹⁰ An Afghan Development Report (ADR) is required for all CERP projects. It is a report that is generated in CIDNE and contains all the project data. It is required per the MAAWS-A that the ADR is updated throughout the project's life cycle as any significant changes, events, or milestones are completed.

¹¹ SIGAR Audit 11-7 "Commander's Emergency Response Program in Laghman Province Provided Some Benefits, but Oversight Weaknesses and Sustainment Concerns Led to Questionable Outcomes and Potential Waste." 27 January 2011.

Central Command (ARCENT) (Finance) guidance dated February 28, 2010, requires that all financial documents related to Operation Enduring Freedom shall be inventoried and retained indefinitely. This guidance applies to CERP files and is retroactive to September 11, 2001. There is further ARCENT draft guidance dated December 17, 2012, that instructs that paper and electronic financial records be maintained, properly boxed, and shipped to ARCENT headquarters no earlier than 13 months and no later than 15 months following the fiscal year in which an appropriation closes for obligation.

Though we did not focus on or review all ongoing culvert denial systems projects that used CERP funds, the CERP manager for RC-N contacted us after our analysis of the data had been completed, and he provided additional information about one of the completed projects in his Regional Command that had been funded through bulk CERP. Quality assurance/quality control (QA/QC) documentation for the project was provided along with an explanation of the process that was followed. The CERP manager conducted additional oversight of this project due, at least in part, to this special project. The engineers who were overseeing this project went on an initial site inspection and identified some issues with the construction of the culvert denial systems that had been installed. The contractor was required to correct the deficiencies prior to payment, and the engineers conducted a final site inspection to ensure that the deficiencies had been corrected. Based on a review of the documentation presented, we believe that QA/QC was performed on this project.

All completed CERP projects that were identified as having a culvert denial systems requirement are listed in table 1.

Table 1 - CERP Awards by Project Number

Ref #	Project Number	Regional Command	Estimated Award Amount ^a	Original Number of Culverts Required in Contract ^b	Number of Culverts Identified on ADR
1	20090520155936	RC-East	\$168,275.00	50	1
2	20120723121433	RC-East	\$300,000.00	N/A	108
3	20090707105431	RC-East	\$1,516,010.00	578	6
4	2009052014570	RC-East	\$168,275.00	50	1
5	20090202081610	RC-East	\$196,400.00	47	1
6	2009113064506	RC-East	\$361,000.00	200	13
7	20100902114944	RC-East	\$88,000.00	108	1
8	20110822053152	RC-East	\$95,000.00	N/A	2
9	20090417161550	RC-East	\$140,000.00	62	9
10	20090417203401	RC-East	\$190,000.00	39	9
11	20110705105126	RC-East	\$40,000.00	35	2
12	20090630065452	RC-East	\$86,101.00	7	4
13	20090520034455	RC-East	\$70,765.20	42	14
14	20090520041728	RC-East	\$8,900.00	6	12
15	20100110065726	RC-East	\$196,560.00	56	4
16	20090627120250	RC-East	\$186,000.00	31	4
17	20090804085201	RC-East	\$509,371.47	578	5
18	20101023104746	RC-North	\$35,190.00	1	1

Table 1 - CERP Awards by Project Number

Ref #	Project Number	Regional Command	Estimated Award Amount ^a	Original Number of Culverts Required in Contract ^b	Number of Culverts Identified on ADR
19	20090316051107	RC-North	\$30,120.00	9	1
20	20101105132015	RC-North	\$116,400.00	27	1
21	20100723080508	RC-South	\$20,249.00	12	12
22	20100818071127	RC-South	\$190,000.00	25	5
23	20100825100656	RC-South	\$180,000.00	N/A	1
24	20100903102432	RC-South	\$180,000.00	N/A	1
25	20090203111314	RC-South	\$368,018.10	108	80
26	20110616084007	RC-South	\$190,000.00	22	1
27	20100121102502	RC-South	\$195,000.00	25	2
28	20100217110439	RC-South	\$389,338.00	46	1
29	20100506134941	RC-South	\$137,967.00	4	1
30	20110321141624	RC-South	\$45,000.00	N/A	4
31	20091221093932	RC-South	\$192,246.00	17	1
32	20100116051950	RC-South	\$150,000.00	20	1
33	20100120061107	RC-South	\$121,198.00	20	1
34	20100206094607	RC-South	\$154,854.00	20	2
35	20100409085619	RC-South	\$144,419.00	N/A	2
36	20100410082153	RC-South	\$127,818.00	19	2
37	20100423053031	RC-South	\$124,806.00	N/A	2
38	20100828053950	RC-South	\$35,000.00	7	7
39	20101225112229	RC-South	\$49,250.00	5	2
TOTALS			\$7,497,530.77	2276	327

Source: SIGAR analysis of data available in the CIDNE database on culvert denial systems contract funded through CERP.

Notes:

^a Contracts may include more than just construction of culvert denial systems. These contracts sometimes include road construction or repair. The estimated award amount is the dollar figure for the entire contract, not just the construction of the culvert denial systems. Because contractors are paid by percentage of work completed and the invoices are not broken out by what specific work was actually completed, we could not determine exactly how much was paid for the culvert denial systems through CERP.

^b This column indicates the number culverts originally identified in the contract. For projects where the contract only had a point-to-point location or indicated a stretch of highway, 'N/A' is listed because the number of culverts was undetermined in the original contract.

APPENDIX II - CENTRAL COMMAND JOINT THEATER SUPPORT CONTRACTING COMMAND CONTRACT DATA

A total of 20 contracts were identified that were awarded by the Central Command Joint Theater Support Contracting Command's (C-JTSCC) subcomponent regional contracting commands (RCC) and that included a requirement for culvert denial systems. Of those 20 contracts, 5 are under the purview of an ongoing SIGAR investigation and were not examined for the purposes of this review. Of the remaining 15 contracts, 1 was awarded by RCC-Shank (geographically within Regional Command-East), 1 was awarded by RCC-Delaram (geographically within Regional Command-Southwest and now closed), 5 were awarded by RCC-Salerno (geographically in Regional Command-East), and the remaining 8 were awarded by RCC-Kandahar within Regional Command-South. At least 4 of the contracts awarded by RCC-Kandahar were blanket purchase agreements (BPA) with multiple task orders against them for the construction of culvert denial systems. Of the BPAs that we reviewed, both W91B4L-11-A-0031 (82 task orders) and W91B4L-11-A-0034 (14 task orders) are no longer active. However, W91B4L-11-A-0033 (currently 117 task orders) and W91B4L-11-A-0037 (currently 198 task orders) are active BPAs. In our review of the 15 contracts for culvert denial systems awarded by C-JTSCC, we identified requirements for over 2,000 culvert denial systems. Given the limitations of the available data, we could not verify how many of these culvert denial systems were completed.

Though some contract files have been sent to Rock Island Contracting Command for storage, we were provided contract file documents for 13 contract numbers.¹² Documents included any DD250s that RCC-Kandahar and RCC-Salerno could find and any quality assurance/quality control (QA/QC) documentation that they still had on their hard drives.¹³ We assessed what was provided on the compact disks to determine the level of QA/QC performed but we could not confirm that any of the contract files provided electronically were complete.

We received several compact disks of data from both RCC-Kandahar and RCC-Sharana. Those disks contained contract files for 10 of the 15 contracts, though not all contract files were complete. Of those contracts files that we were able to review, we generally found that QA/QC documentation—such as pictures or documentation of site visits by the contracting officer's representative—were not available. Further, of the 15 contracts that we reviewed for this project, 5 of those contract files have been sent to the Rock Island Contracting Center for storage, and the contracts were not available. Additional information about the contracts we reviewed is in Table 2.

Table 2 - JTSCC Awards by Contract Number

Ref #	Contract Number	Awarding Office	Award Amount ^a	Culverts Required In Contract ^b
1	W90YVD-12-C-0022	RCC-Shank	\$20,293	1
2	W919QC-10-P-0105	RCC-Delaram	\$61,610	18
3	W91B4L-09-C-RP03	RCC-Kandahar	\$2,798,000	Point-to-Point
4	W91B4L-09-C-RP04	RCC-Kandahar	\$997,650	450

¹² We were provided contract files for the following contract numbers: W91B4L-11-A-0031, W91B4L-11-A-0033, W91B4L-11-A-0034, W91B4L-11-A-0037, W91B4L-11-C-RP00, W91B4L-11-C-RP001, W91B4L-11-C-RP04, and W91B4L-11-C-RP06, W91B4P-11-C-0029, W91B4P-11-C-0046, W91B4P-11-C-0078, W91B4P-11-C-0236, and W91B4P-12-C-0004.

¹³ A DD250 is DOD's Material Inspection and Receiving Report, which documents, among other things, DOD acknowledgement of receipt of material.

Table 2 - JTSCC Awards by Contract Number

Ref #	Contract Number	Awarding Office	Award Amount ^a	Culverts Required In Contract ^b
5	W91B4L-10-D-0020	RCC-Kandahar	\$10,000,000	Not Defined
6	W91B4L-10-D-0021	RCC-Kandahar	\$1,616,019	Not Defined
7	W91B4L-11-A-0031	RCC-Kandahar	\$2,277,955	329
8	W91B4L-11-A-0033	RCC-Kandahar	\$2,052,475	419 ^c
9	W91B4L-11-A-0034	RCC-Kandahar	\$416,975	65
10	W91B4L-11-A-0037	RCC-Kandahar	\$3,282,153	709 ^d
11	W91B4P-11-C-0029	RCC-Salerno	\$312,063	79
12	W91B4P-11-C-0046	RCC-Salerno	\$335,060	120
13	W91B4P-11-C-0078	RCC-Salerno	\$66,814	21
14	W91B4P-11-C-0236	RCC-Salerno	\$149,500	Point-to-Point
15	W91B4P-12-C-0004	RCC-Salerno	\$49,065	1
Totals			\$24,435,632	2212

Source: Add

^a These estimates are based on the requirements in the award documents. Due to the lack of information on invoice and payment data, we cannot determine how much of an award was expended.

^b These estimates are based on requirements in the award documents. Because the contract files did not contain invoice information, we could not be certain whether all of the requirements were met.

^c In addition to the 395 specific Military Grid Reference System (MGRS) points, there was 1 requirement that was a point-to-point, 1 requirement that contained 24 requirements but no MGRS points, and 9 requirements we believe had a culvert denial system requirement, but we could not confirm that there was actually a culvert denial system requirement without the statement of work.

^d The culvert denial system requirements are a minimum. Because there are point-to-point requirements and because this is an open BPA, we expect the actual number of culvert denial system requirements to be higher.

APPENDIX III - COMMENTS FROM CENTRAL COMMAND JOINT THEATER SUPPORT CONTRACTING COMMAND



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



CJTSCC/DCO

10 July 2013

MEMORANDUM FOR SIGAR's Office of Special Projects

SUBJECT: Response to SIGAR SP-13-X - Draft Report - "Improvised Explosive Devices: Better Contract Management Needed to Track and Evaluate the Effectiveness of Culvert Denial Systems"

1. CJTSCC has reviewed the subject report and concurs with recommendations as listed below:

a. Recommendation 1: "Ensure that specific requirements are included in all contracts for QA/QC to be performed and that this QA/QC documentation be reviewed by the appropriate technical experts in order to ensure the quality of the culvert denial systems installed."

Response: C-JTSCC hired a QA Tech Director and team of QA Specialists led by a QA Technical Lead to establish a QA Program that will improve C-JTSCC's surveillance of contract QA requirements. The QA Specialists participate early in the Joint Acquisition Review Board (JARB)/pre-award process to ensure adequate QA requirements are included in all contracts. QA Specialists are responsible for providing technical assistance to contracting officers to ensure contractors comply with QA requirements in their contracts with emphasis on high-visibility contracts like culvert denial systems. QA Specialists provide oversight and assistance to Construction Control Representatives (ConReps) and Contracting Officer Representatives (CORs) to ensure the C-JTSCC QA Program complies with USG, DoD, and Army QA regulations, policies, and procedures including the FAR, DFARS, and AFARS, as well as audit agency recommendations including GAO, DoDIG, SIGAR, COWC, and Gansler as applicable.

Additionally, C-JTSCC hired a COR Manager in July 2012 to augment the subject matter experts (SMEs) workforce and provide a single point of contact. This COR Manager functions as a focal point to assure that CORs, contracting officers and other SMEs focus on contract monitoring, contractor oversight, performance monitoring, documentation, contract reviews, and contract deliverables in accordance with contract requirements.

b. Recommendation 2: "Ensure that contracting officials are performing the required QA/QC for culvert denial systems requirements prior to making payments."

Response: C-JTSCC tasked the COR Manager with responsibilities to assure the COR workforce is certified in training courses based on contract workload requirements, is adhering to COR policies/procedures, and has access to specialized SMEs on construction projects to perform post-award quality assurance duties and functions in support of contracting officers.

CJTSCC/DCO

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The QA Technical Director developed a QA "Way Ahead" Plan to improve surveillance of QA requirements in contracts and collaboratively designed and implemented a continuous QA workload measurement process for ConReps. The QA Tech Lead will implement the QA "Way Ahead" Plan and evolve C-JTSCC's QA Program in support of contracting officers.

In addition, C-JTSCC issued recent policy which, in part, addresses topics such as preparation of QA surveillance plans (QASP), maintenance of government records [QA Standard Operating Procedure (SOP)], COR training and technical assistance (COR SOP). Decision to waive a QASP shall be made only by the Regional Contracting Center (RCC)/Regional Contracting Officer (RCO) Chiefs per Commanding General direction, based on sound judgment and documented proof the contractor is in compliance with all contract requirements (e.g., Statement of Work (SOW), construction drawings, and/or blueprint specifications).

c. Recommendation 3: "Ensure actions are taken to identify, to the extent possible, the locations of culvert denial systems throughout Afghanistan."

Response: The C-JTSCC Senior Contracting Official-Afghanistan (SCO-A) has tasked all RCC/RCO Chiefs to review and identify all culvert denial systems contract actions, locations and associated records (e.g., contracts, COR monthly reports, and trip reports) they have awarded.

2. Action for Recommendation 3 requires additional time to assemble and review all associated records. We hereby request an extension of 30 days to complete this action.
3. Questions regarding this memo can be addressed to C-JTSCC/FUOPS at [REDACTED]

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Linda Schlesinger
CAPT, USN
Deputy Commander

APPENDIX IV - COMMENTS FROM THE INTERNATIONAL SECURITY ASSISTANCE FORCE JOINT COMMAND



INTERNATIONAL SECURITY ASSISTANCE FORCE (ISAF)
Joint Command (IJC)
Kabul, Afghanistan
APO, AE 09320



ISAF -IJC-IG

17 July 2013

MEMORANDUM FOR USFOR-A

SUBJECT: IJC Response to Final Report - SIGAR SP-3.

1. IJC has reviewed the draft report from SIGAR SP-3 "Improvised Explosive Devices: Better Contract Management Needed to Track and Evaluate the Effectiveness of Culvert Denial Systems (CDS)". IJC concurs with all three of the report's recommendations, but provides the following comments for context and clarification:

a. Recommendation 1: Concur - Due to troop draw down, it is unlikely that Coalition Forces (CF) will have the resources to inspect, or re-inspect, every CDS from prior years' contracts, especially in contested areas. CF commanders may, if resources permit, remotely verify installation of CDS using imagery from aerial platforms.

b. Recommendation 2: Concur - Though CERP is a viable tool to fund installation of CDS (transportation project category), GIRoA Ministry of Public Works should bear the costs of installing CDS on civilian transportation routes. Additionally, CF commanders must continue to ensure the routes used to support CF operations are secure and culverts are properly cleared and/or protected by CDS. QA/QC inspections should be documented with digital photos bearing ephemeral MGRS data and date stamp. However, it must be recognized that a visual inspection does not guarantee that a CDS is properly affixed or that it couldn't be easily removed.

c. Recommendation 3: Concur - Use of aerial platforms to identify locations of CDS should be considered, if available. GIRoA and ANSF should be leveraged to assist in this effort as CF draw down.

2. Point of contact for this response is COL Ron McNamara at DSN [REDACTED]

Ronald
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