

# SIGAR

## Special Inspector General for Afghanistan Reconstruction

SIGAR 19-48 Inspection Report

Afghan National Police Women's Compound at the Jalalabad Regional Training Center: Construction Generally Met Contract Requirements, but Fire-Related Deficiencies Pose Safety Hazards and the Almost \$6.7 Million Facility Has Never Been Used



JULY  
2019



**SIGAR**

Office of the Special Inspector General  
for Afghanistan Reconstruction

July 11, 2019

The Honorable Dr. Mark T. Esper  
Acting Secretary of Defense

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Commander, U.S. Central Command

General Austin Scott Miller  
Commander, U.S. Forces–Afghanistan and  
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Lieutenant General Todd T. Semonite  
Commanding General and Chief of Engineers,  
U.S. Army Corps of Engineers

Lieutenant General James E. Rainey  
Commander, Combined Security Transition Command–Afghanistan

This report discusses the results of SIGAR’s inspection of the Afghan National Police (ANP) women’s compound at the Jalalabad Regional Training Center (RTC). On September 2, 2015, the U.S. Army Corps of Engineers (USACE) awarded an almost \$5.7 million firm-fixed-price contract to Gurbat Daryabi Construction Company (GDC) to design and construct the compound. The contract required GDC to design and construct a women’s compound adjacent to the existing men’s compound to accommodate and train up to 300 female students. The contract required GDC to construct multiple structures, such as classrooms, barracks, a dining facility (DFAC), a medical clinic, and a perimeter wall separating the women’s and men’s compounds. USACE modified the contract five times, increasing the contract’s value to almost \$6.7 million. On June 9, 2017, the Combined Security Transition Command–Afghanistan (CSTC-A) transferred the completed facilities to the Afghan Ministry of Interior (MOI).

During our September and October 2018 site visits, we found that GDC generally built the ANP women’s compound according to contract requirements and technical specifications. However, we found that GDC did not install four of the six required fire extinguishers in the DFAC, and the two installed were in incorrect locations. In addition, GDC did not install fire-rated doors and fire-rated rolling-counter doors in the DFAC as required. USACE did not discover these deficiencies during the final and warranty inspections. The fire safety deficiencies increase the risk of injury or death to DFAC occupants should a fire occur. In response to SIGAR concerns about fire safety at other U.S.-constructed MOI facilities, on June 22, 2018, CSTC-A sent the MOI a letter advising it of safety issues associated with fire extinguishers and fire doors at ANP facilities throughout Afghanistan.

Since its completion in June 2017, the ANP women’s compound at the RTC in Jalalabad has never been used. According to a senior CSTC-A official, the MOI cited security concerns for not using the compound. We could not determine how long this condition will last or whether the ANP women’s compound at the Jalalabad RTC will be used for training or any other purpose in the future. Absent additional information regarding the future use of the compound, it appears the almost \$6.7 million spent on the construction will not benefit ANP’s female officers, which was the funding’s intent.



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Because the MOI assumed responsibility for the Jalalabad RTC women's compound and the warranty has expired, we are not making any recommendations in this report.

We provided a draft of this report to the Department of Defense for review and comment. USACE provided written comments, which are reproduced in appendix II. In its comments, USACE stated that it generally agreed with the report and acknowledged the deficiencies we identified. Regarding the missing fire extinguishers, USACE maintains that GDC installed five of the six extinguishers required, and that GDC has agreed to install the one missing fire extinguisher even though the warranty has expired. USACE also stated that it has made positive adjustments to its oversight processes. For example, USACE stated that it has implemented a training program for USACE personnel, which involves a comprehensive review of fire door assemblies. CSTC-A provided technical comments, which we incorporated into this report, as appropriate.

We conducted this inspection under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended; and in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency.

John F. Sopko  
Special Inspector General  
for Afghanistan Reconstruction

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## ABBREVIATIONS

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ANP	Afghan National Police
CSTC-A	Combined Security Transition Command–Afghanistan
DFAC	dining facility
GDC	Gurbat Duryabi Construction Company
MOI	Ministry of Interior
RTC	Regional Training Center
USACE	U.S. Army Corps of Engineers

The NATO Resolute Support Women’s Participation Program provides funds to design and construct facilities for women in the Afghan National Army and Afghan National Police (ANP). These facilities typically include administration and training centers, barracks, dining facilities, fitness centers, prayer rooms, and childcare centers. The Combined Security Transition Command–Afghanistan (CSTC-A) administers the program’s funding. According to CSTC-A officials, the program intends to create environments where women in the Afghan army and police can train with minimal interference from individuals who are hostile to women’s participation in these organizations. As of January 2019, the Women’s Participation Program funded 18 ANP construction projects valued at \$82.4 million, including \$25.9 million for 16 projects funded with U.S. funds.

On September 2, 2015, the U.S Army Corps of Engineers (USACE) awarded an almost \$5.7 million firm-fixed-price contract to Gurbat Daryabi Construction Company (GDC), an Afghan company, to design and construct a women’s compound at the ANP Regional Training Center (RTC) in Jalalabad, Nangarhar province (see figure 1).<sup>1</sup> The contract required GDC to construct the compound adjacent to the existing men’s compound to accommodate and train up to 300 female students. According to the contract, the women’s compound would consist of nine buildings—an administration building, two classrooms, three barracks, a dining facility (DFAC), a daycare center, and a medical clinic—along with eleven support facilities, including a perimeter wall separating the female and male compounds, and four utility systems. The contract also required GDC to renovate a building on the women’s compound.<sup>2</sup> USACE issued the notice to proceed on October 13, 2015, and the project’s scheduled completion date was February 24, 2017.

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**Figure 1 - ANP Regional Training Center in Jalalabad**



Source: SIGAR

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<sup>1</sup> The contract number is W5J9JE-15-C-0020. CSTC-A funded this contract using the U.S. Department of Defense’s Afghanistan Security Forces Fund.

<sup>2</sup> The contract also included the construction of a classroom building on the men’s compound. USACE included this building because it planned to contract with GDC for the work and it was more efficient to do so under this contract. CSTC-A used \$447,440 from the Afghanistan Security Forces Fund to construct this building.

USACE modified the contract five times to (1) realign the perimeter wall, (2) revise the compound's layout, (3) add a classroom building, (4) integrate all areas of the compound at the RTC under one underground electrical distribution system, and (5) de-scope the contract's collapsible soil remediation.<sup>3</sup> These modifications resulted in USACE extending the project's completion date by four months to June 14, 2017, and increasing the contract's value to almost \$6.7 million. GDC completed the project on May 25, 2017. CSTC-A transferred the facilities to the Afghan Ministry of Interior (MOI) on June 9, 2017, and the warranty expired on May 25, 2018.

The objectives of this inspection were to determine whether (1) the construction was completed in accordance with contract requirements and applicable construction standards, and (2) the facilities are being used and maintained.

We conducted our inspection work in Kabul and Jalalabad, Afghanistan, from April 2018 through July 2019, in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. Our professional engineers conducted the engineering assessment in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. Appendix I contains a discussion of our scope and methodology.

## THE ANP WOMEN'S COMPOUND WAS GENERALLY BUILT TO CONTRACT REQUIREMENTS, BUT TWO FIRE-RELATED CONSTRUCTION DEFICIENCIES POSE SAFETY HAZARDS

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We conducted four site visits to the ANP women's compound at the RTC in Jalalabad between September 25 and October 7, 2018, and found that GDC generally constructed the facilities in accordance with the contract requirements (see photo 1). For example, the floors, walls, and ceilings had no visible defects. We also found that the mechanical and plumbing features were working properly, and there were no leaks in the water pipes, sinks, or toilets. In addition, the electrical air conditioning units were functioning correctly. Further, we found no soil settlement or standing water near the compound's buildings.

However, we found two construction deficiencies involving the DFAC's fire extinguishers and its doors and rolling counter doors, which have created safety hazards. The deficiencies resulted from two factors: (1) GDC contravening the contract's technical specifications, or in some cases, the design drawings, and (2) USACE's inadequate oversight.

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**Photo 1 - Newly Constructed Buildings on the ANP Women's Compound**



Source: SIGAR, September 26, 2018

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<sup>3</sup> Collapsible soil remediation, such as compaction, is the treatment of soil that has settled in the project area.



## GDC Did Not Install All Required Fire Extinguishers in the DFAC

The contract required GDC to install six fire extinguishers in the DFAC in accordance with the standards set forth by both the National Fire Protection Association and the International Fire Code.<sup>4</sup> USACE approved GDC to purchase Amerex extinguishers. During our site visits, we found that GDC only installed two Amerex fire extinguishers and did so in locations that violate fire safety requirements. Although the as-built drawings showed six fire extinguishers installed in the DFAC, we did not find any fire extinguishers or wall brackets in the six designated locations. However, we found two extinguishers installed adjacent to propane stoves, even though the International Fire Code recommends against installing extinguishers adjacent to a source of fire. Missing or incorrectly located fire extinguishers create a safety risk and could result in injury or death should a fire occur. Neither USACE nor GDC identified these deficiencies during the final or warranty inspections.

## GDC Did Not Install the Required Fire-Rated Doors and Fire-Rated Rolling Counter Doors in the DFAC

The contract's technical specifications and design drawings required GDC to install two non-certified fire-rated doors and two certified fire-rated rolling-counter doors in the DFAC. During a fire, fire-rated doors are designed to limit the spread of smoke and flames, and to protect a building's main exit paths. In addition, if a fire occurs the lack of such protection increases the occupants' risk of injury or death. The contract's technical specifications required that DFAC's rolling counter doors conform to the National Fire Protection Association's requirements, and have labels indicating the doors' applicable fire resistance rating and certification by a recognized testing agency.

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**Photo 2 - Non-certified and Non-fire-rated Rolling Counter Door in the DFAC**



Source: SIGAR, September 25, 2018

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USACE approved GDC to install Omran Steel Tech fire-rated doors and Cornell Cookson certified fire-rated rolling counter doors in the DFAC. However, during our site visits, we found that GDC substituted, without authorization, regular doors that also lacked labels. Further, GDC substituted counterfeit, non-certified and non-fire-rated rolling counter doors from an unknown source (see photo 2). The installed rolling counter doors had labels with "Cornell Rolling Fire Doors" printed on them, but on January 25, 2019, Cornell Cookson confirmed that the doors were not Cornell products after reviewing photos we took during our site visits. GDC's substitution of non-fire-rated for fire-rated doors creates a safety hazard for dining facility occupants. We found that USACE did not identify this deficiency during the final or warranty inspections.

In response to SIGAR's concerns about fire safety at other U.S.-constructed MOI facilities, on June 22, 2018 CSTC-A sent a letter to the MOI Facilities Directorate advising it of the "potential life, health and safety issues

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<sup>4</sup> The National Fire Protection Association is a global nonprofit organization that seeks to eliminate death, injury, property, and economic loss due to fire, electrical, and related hazards. The International Fire Code establishes minimum regulations for fire prevention and fire protection systems using prescriptive and performance-related provisions.



at buildings occupied by Ministry of Interior personnel.”<sup>5</sup> The letter also states that “certain fire safety standards, such as fire-doors and operational fire extinguishers may not be present in facilities and may impact the ability for personnel to effectively address fire hazards.”<sup>6</sup> CSTC-A encouraged the MOI to review its facilities and consider assigning a primary and alternate fire warden to each facility to identify and resolve fire safety issues. CSTC-A also attached a fire safety checklist to the letter for the MOI to use when reviewing the facilities.<sup>7</sup>

Because the MOI has assumed responsibility for the women’s compound at the RTC in Jalalabad, and the warranty has expired, neither USACE nor CSTC-A appears to have a cost-effective way of requiring the contractor to correct the fire extinguisher and fire door deficiencies.

## THE ANP WOMEN’S COMPOUND IS NOT BEING USED OR MAINTAINED

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During our September and October 2018 site visits, we found that none of the buildings or facilities on the ANP women’s compound at the Jalalabad RTC were being used. Additionally, the compound has never been used since CSTC-A transferred it to the MOI in May 2017.

According to a Resolute Support Command Senior Gender Advisor, around December 2017, the new Afghan Minister of Interior placed a moratorium on training female ANP recruits at this and all ANP women’s training centers outside of Kabul because the MOI does not consider the centers secure. Specific security concerns were not specified by the MOI or identified during our inspection. According to the ANP Commander of the Educational Academy for Women and Resolute Support Senior Gender Adviser, female police are trained under a special program in Turkey. The official also told us that the MOI eventually plans to train all female police in Kabul to help establish a national identity and consistency in police practice, but this plan is still in the discussion phase. It is not clear how the Jalalabad women’s compound might fit into any new training initiative.

Despite our requests, neither the Gender Advisor Office nor the MOI provided us with any written documentation or formal statement indicating the reasons, timing, or other details of this moratorium. As a result, we could not determine how long the training moratorium will last or whether the ANP women’s compound at the Jalalabad RTC will be used for training or any other purpose in the future.

Although the compound is unoccupied, CSTC-A stated that the compound’s maintenance is covered by an on-budget MOI contract.

## CONCLUSION

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Although most buildings and facilities on the ANP women’s compound at the RTC in Jalalabad were constructed according to contract requirements and technical specifications, two fire-related deficiencies in the DFAC have created potential safety hazards. Specifically, GDC did not install the correct number of fire extinguishers or place them in the correct locations in the DFAC. GDC installed noncompliant fire doors in the same building, increasing the risk of injury or death to occupants should a fire occur. Even though the DFAC is not in use, CSTC-A has informed the MOI of the potential hazards associated with these noncompliant items and provided ministry officials with a checklist to identify and address potential safety issues.

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<sup>5</sup> CSTC-A, “Letter to MOI Facilities Directorate Acting Director on Life, Health, and Safety at MOI Facilities,” June 22, 2018, p. 1.

<sup>6</sup> CSTC-A, “Letter to MOI Facilities Directorate,” p. 1.

<sup>7</sup> There are 50 items on the fire safety checklist, such as determining whether portable fire extinguishers are in their designated locations, fully charged, and properly tagged, and whether smoke and fire detectors are free from obstructions.

To date, the buildings and facilities on the women's compound have not been occupied or used. Absent any additional information regarding the future use of the compound, it appears the almost \$6.7 million spent on the construction will not benefit the ANP women, which was the funding's intent.

Because the MOI has assumed responsibility for the women's compound at the RTC in Jalalabad, and the warranty has expired, we are not making any recommendations in this report.

## AGENCY COMMENTS

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We provided a draft of this report to Department of Defense for review and comment. USACE provided written comments, which are reproduced in appendix II. In addition, CSTC-A provided technical comments, which we incorporated into this report as appropriate.

USACE generally agreed with the report and acknowledged the deficiencies we identified. Regarding the missing fire extinguishers, USACE noted the time difference between project turnover and our inspection, and stated that the MOI may have removed the fire extinguishers that GDC installed or moved them to other locations. We disagree. During our inspection of the DFAC, we did not find any evidence that GDC installed wall brackets to hold the fire extinguishers, which indicates that GDC never installed them. Nonetheless, USACE maintains that GDC installed five of the six required fire extinguishers. In its comments, USACE stated that even though the warranty has lapsed, GDC has agreed to install the one missing fire extinguisher.

USACE also stated that it has made positive adjustments to its processes by centralizing the "design review of reach back [Transatlantic Middle East] District products" to ensure that current designs fully comply with published standards for host nation facilities. USACE further stated that it implemented a training program for project engineers, quality assurance representatives, and local national quality assurance personnel entailing a comprehensive review of fire door assemblies.

## APPENDIX I - SCOPE AND METHODOLOGY

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This report provides the results of SIGAR's inspection of the Afghan National Police (ANP) women's compound at the regional training center in Jalalabad. The objectives of this inspection were to determine whether (1) the construction was completed in accordance with contract requirements and applicable construction standards, and (2) the facilities are being used and maintained. Specifically, we

- reviewed contract documents, design submittals, and other relevant project documentation;
- interviewed Combined Security Transition Command–Afghanistan, U.S. Army Corps of Engineers, Gender Advisor Group, and ANP officials concerning the project's construction, use, and maintenance; and
- conducted site visits on September 25, 26, and 27, and October 7, 2018.

We did not rely on computer-processed data in conducting this inspection. However, we considered compliance with laws and indicators of fraud, abuse, or other illegal acts, and their potential impact.

In December 2014, SIGAR entered into a cooperative agreement with Afghan civil society partners. Under this agreement, our Afghan partners conduct specific inspections, evaluations, and other analyses. In this regard, Afghan engineers inspected the ANP women's compound facilities in September and October 2018. We developed a standardized engineering evaluation checklist covering items required by the contract and other design and specification documents. Our checklist required our partners to analyze the contract documents, scope of work, technical specifications, and design drawings.

We compared the information provided by our Afghan civil society partners to accepted engineering practices, relevant standards, regulations, laws, and codes for quality and accuracy. In addition, as part of our monitoring and quality control process, we

- met with our Afghan partner engineers to ensure that the approach and planning for the inspection were consistent with the objectives of our inspection and the terms of our cooperative agreement;
- attended periodic meetings with our partners, and conducted our normal entrance and exit conferences with agency officials;
- discussed significant inspection issues with our partners;
- monitored our partners' progress in meeting milestones and revised contract delivery dates as needed; and
- conducted oversight of our partners in accordance with SIGAR's policies and procedures to ensure that their work resulted in impartial, credible, and reliable information.

We conducted our inspection work in Kabul and Jalalabad, Afghanistan, from April 2018 through July 2019. This work was conducted in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. Our professional engineers conducted the engineering assessment in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our inspection objectives. We conducted this inspection under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended.

## APPENDIX II - COMMENTS FROM THE U.S. ARMY CORPS OF ENGINEERS

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DEPARTMENT OF THE ARMY  
UNITED STATES ARMY CORPS OF ENGINEERS  
TRANSATLANTIC DIVISION  
201 PRINCE FREDERICK DRIVE  
WINCHESTER, VIRGINIA 22602-4373

18 JUN 2019

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report (Project Code SIGAR-I-054), Afghan National Police Women's Compound at the Jalalabad Regional Training Center: Construction Generally Met Contract Requirements, but Fire-related Deficiencies Pose Safety Hazards and the Almost \$6.7 Million Facility Has Never Been Used

Mr. John F. Sopko  
Special Inspector General for Afghanistan Reconstruction  
1550 Crystal Drive, Suite 900  
Arlington, VA 22202

Dear Mr. Sopko:

The purpose of this letter is to provide the U.S. Army Corps of Engineers (USACE) response to the subject report.

USACE generally agrees with the inspection comments and acknowledges the deficiencies noted in the report. Although there are no recommendations, USACE provides additional discussion regarding the deficiency involving missing fire extinguishers in the dining facility and changes to our quality assurance processes after the conclusion of the inspection. Additional details are provided in the enclosure.

My point of contact for this response is Ms. Erin K. Connolly, TAD Internal Review Auditor (Interim). She may be reached by e-mail at [erin.k.connolly@usace.army.mil](mailto:erin.k.connolly@usace.army.mil) or by telephone at 540-665-5348.

Sincerely,

A handwritten signature in black ink that reads "M.C. Quander".

MARK C. QUANDER  
Colonel(P), U.S. Army  
Commanding

Enclosure





DEPARTMENT OF THE ARMY  
UNITED STATES ARMY CORPS OF ENGINEERS  
TRANSATLANTIC AFGHANISTAN DISTRICT  
BAGRAM AIRFIELD  
APO AE 09354-1053

CETAA-IR

11 JUN 2019

MEMORANDUM FOR Commander, United States Army Corps of Engineers (USACE)  
Transatlantic Division (TAD), Winchester, VA 22602

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report, I-054 Afghan National Police Women's Compound at the Jalalabad Regional Training Center

1. This is the Transatlantic Afghanistan District's (TAA) response to the subject SIGAR Draft Report. TAA concurs with the draft report's conclusion that most buildings and facilities on the ANP women's compound at the RTC in Jalalabad were constructed according to contract requirements and technical specifications.

2. We generally agree with the inspection comments and acknowledge the deficiencies noted in this report. Although there are no recommendations contained in the report, there are observations related to one deficiency described in the report that requires addressing by TAA. The missing fire extinguishers in the dining facility (DFAC) discussion follows:

a. USACE would like to point out the time period elapsed between project turnover and the SIGAR inspection. Construction was completed 25 May 2017. CSTC-A transferred the facilities to the Afghan Ministry of Interior (MOI) 26 May 2017. SIGAR conducted site visits 25 September 2018 and 7 October 2018, sixteen months after turnover. During this time, the MOI may have removed or moved locations of the fire extinguishers installed by the contractor, Gurbat Daryabi Construction (GDC). GDC installed five of the six required extinguishers. Based on SIGAR's preliminary deficiency findings, USACE contacted GDC regarding the one missing fire extinguisher. Even though the warranty period had elapsed, GDC agreed to install the missing fire extinguisher.

b. USACE has made positive adjustments to its processes by centralizing design review of reach back District products at the Transatlantic Middle East District (TAM) to ensure that current designs fully comply with published standards for host nation facilities. In addition, USACE implemented a training program for our Project Engineers, Quality Assurance Representatives and Local National Quality Assurance personnel entailing a comprehensive review of fire door assemblies. We have seen improvement in resolving this finding and believe this will continue with current and future projects.

CETAA-IR

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report, I-054 Afghan National Police Women's Compound at the Jalalabad Regional Training Center

3. USACE appreciates the opportunity to comment on this draft inspection report report for the "Inspection of ANP Women's Compound at Regional Training Center in Jalalabad.

4. My point of contact for this response is Ms. Melissa D. Blackburn, Internal Review Auditor. She may be reached by e-mail at [Melissa.D.Blackburn@usace.army.mil](mailto:Melissa.D.Blackburn@usace.army.mil), or by telephone at 540-662-4900.

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## APPENDIX III - ACKNOWLEDGMENTS

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Zeer Hasibullah, Program Analyst

Javed Khairandish, Engineer

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This inspection was conducted  
under project code SIGAR-I-054.

## SIGAR's Mission

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