

# SIGAR

**Special Inspector General for  
Afghanistan Reconstruction**

**SIGAR 19-04 Inspection Report**

**Afghan National Police Women's Compound  
at the Ministry of Interior: Construction  
Generally Met Requirements, but Use and  
Maintenance Remain Concerns**



OCTOBER  
2018

# SIGAR

## Special Inspector General for Afghanistan Reconstruction

### WHAT SIGAR REVIEWED

On September 15, 2015, the U.S. Army Corps of Engineers (USACE) awarded a \$3 million firm-fixed-price contract to Afghan Construction Companies Umbrella (ACCU) to develop the site and design and build an Afghan National Police (ANP) women's compound within the Ministry of Interior (MOI) headquarters complex in Kabul, Afghanistan. The contract required ACCU to construct multiple facilities, including a barrack, childcare center, conference center, administration building, fitness center, latrine facility, laundry facility, trash collection point, and a perimeter wall with entrance gates.

USACE issued four contract modifications, which increased the contract's value to approximately \$3.1 million. The modifications included building a sunshade canopy for the childcare center, changing the perimeter wall's location, and changing the parking area's surface from asphalt to concrete.

On July 8, 2017, USACE transferred the completed project to the Combined Security Transition Command–Afghanistan (CSTC-A), and on August 24, 2017, CSTC-A transferred the facilities to the MOI. The 1-year warranty for the compound expired on June 18, 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.

October 2018

## Afghan National Police Women's Compound at the Ministry of Interior: Construction Generally Met Requirements, but Use and Maintenance Remain Concerns

### SIGAR 19-04 INSPECTION REPORT

#### WHAT SIGAR FOUND

During site visits conducted in November 2017 and in March and April 2018, SIGAR found that ACCU generally constructed the women's compound according to contract requirements. However, SIGAR also found seven construction deficiencies that USACE did not detect during the construction or the contract's warranty period. Specifically, SIGAR found that ACCU:

1. substituted carbon dioxide fire extinguishers in 17 locations where dry chemical fire extinguishers were required, putting occupants at greater risk if certain types of fires occur;
2. did not install thumb latches on the inside of 47 doors to rooms in the barrack;
3. did not install cable racks in the communication manholes, which provide access to telephone and internet cables;
4. did not tag the cables in the communication manholes;
5. installed temperature and pressure relief valves on water heaters without the required drainpipe;
6. covered the underground water line valves with concrete making them inaccessible; and
7. did not install concrete curbs in shower stalls in the childcare center.

SIGAR also identified four items—some electric heaters; water pipes; a gas stove; and a heating, ventilation, and air conditioning system—that were installed but not operating properly. SIGAR advised USACE of these deficiencies and non-operable items, and USACE directed ACCU to correct them. As of August 28, 2018, ACCU had corrected all seven deficiencies and the four items with operational issues.

SIGAR also found that USACE did not consistently enforce all elements of its three-phase quality control inspection process, reducing its ability to oversee ACCU and enforce contract compliance. ACCU was required to conduct and document meetings to track 41 definable features of work for the preparatory, initial, and follow-up phases of the construction, and send those minutes to USACE. However, USACE could not provide SIGAR any of the initial meeting minutes and provided the preparatory meeting minutes for only 17 of the 41 definable features of work. Therefore, SIGAR could not determine whether these required meetings even occurred. For the follow-up phase, USACE provided SIGAR with copies of ACCU's daily quality control reports for 97 percent of the working days through the project's completion in June 2017. This indicates that ACCU was generally successful in executing the follow-up phase.

Although SIGAR found that the ANP women's compound is being used, some facilities, such as the barrack and conference center, are either not being used at full capacity or are not being used at all. For example, during its site visits, SIGAR observed that the MOI's ANP education directorate was using two rooms in the barrack for office space, leaving the rest of the barrack vacant. SIGAR also found that the conference and fitness centers were not being used. In addition, SIGAR did not observe any activity on the compound supporting male police. Further, SIGAR found the MOI is still trying to decide how to best use the compound's facilities and has not purchased furniture or equipment for some facilities. Lastly, SIGAR found that with a few minor exceptions, the women's compound is being maintained, but the lack of a maintenance contract raises concerns about the compound's maintenance in the long term.

## WHAT SIGAR RECOMMENDS

To enhance USACE's oversight of reconstruction projects in Afghanistan, SIGAR recommends that the USACE Commanding General and Chief of Engineers:

- 1. Enforce requirements for USACE personnel to adhere to the organization's three-phase quality assurance inspection process, including requiring the contractor to conduct all meetings during the preparatory and initial phases for each of the definable features of work under the contract, and document the minutes of those meetings.**

USACE provided written comments on a draft of this report. In those comments, USACE concurred with the recommendation and stated that the Transatlantic Afghanistan District's project engineers and construction representatives are taking steps to ensure that the three-phase inspection process is fully executed.



**SIGAR**

Office of the Special Inspector General  
for Afghanistan Reconstruction

October 26, 2018

The Honorable James N. Mattis  
Secretary of Defense

General Joseph L. Votel  
Commander, U.S. Central Command

General Austin Scott Miller  
Commander, U.S. Forces–Afghanistan and  
Commander, Resolute Support

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 Ministry of Interior (MOI) headquarters in Kabul, Afghanistan. On September 15, 2015, the U.S. Army Corps of Engineers (USACE) awarded a \$3 million contract to Afghan Construction Companies Umbrella (ACCU) to construct the compound, which includes a barrack, a childcare center, a conference center, an administration building, a fitness center, a latrine facility, a laundry facility, a trash collection point, and a stone veneer perimeter wall with entrance gates. On July 8, 2017, USACE transferred the completed facilities to the Combined Security Transition Command–Afghanistan (CSTC-A), and on August 24, 2017, CSTC-A transferred the facilities to the MOI. The warranty expired in June 2018.

We are making one recommendation in this report. To enhance USACE’s oversight of reconstruction projects in Afghanistan, we recommend that the USACE Commanding General and Chief of Engineers enforce requirements for USACE personnel to adhere to the organization’s three-phase quality assurance inspection process, including requiring the contractor to conduct all meetings during the preparatory and initial phases for each of the definable features of work under the contract, and document the minutes of those meetings.

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 the comments, USACE concurred with the recommendation and stated that the Transatlantic Afghanistan District’s project engineers and construction representatives are taking steps to ensure that the three-phase inspection process is fully executed.

We conducted this work 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

# TABLE OF CONTENTS

|   |    |
|---|----|
| The ANP Women’s Compound Was Generally Built to Contract Requirements, but USACE Did Not Detect Seven Construction Deficiencies or Consistently Enforce Its Quality Control Process ..... | 1  |
| Most Facilities on the Women’s Compound Are Being Used and Maintained, but Future Maintenance Is a Concern .....  | 5  |
| Conclusion.....   | 6  |
| Recommendations .....   | 7  |
| Agency Comments .....   | 7  |
| Appendix I - Scope and Methodology .....  | 8  |
| Appendix II - Comments from the U.S. Army Corps of Engineers .....  | 9  |
| Appendix III - Acknowledgements .....   | 10 |

## TABLES

---

|  |   |
|--|---|
| Table 1 - Construction Deficiencies SIGAR Identified at the ANP Women’s Compound ..... | 2 |
|--|---|

## PHOTOS

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|  |   |
|--|---|
| Photo 1 - Barrack at the ANP Women’s Compound .....        | 2 |
| Photo 2 - Communications Manhole With No Cable Racks ..... | 3 |

## ABBREVIATIONS

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|        |  |
|--------|--|
| ACCU   | Afghan Construction Companies Umbrella           |
| ANP    | Afghan National Police                           |
| CSTC-A | Combined Security Transition Command–Afghanistan |
| MOI    | Ministry of Interior                             |
| USACE  | U.S. Army Corps of Engineers                     |

The NATO Resolute Support Mission's Women's Participation Program provides funds to design and construct Afghan National Army and Afghan National Police (ANP) facilities to support Afghan women in the security forces. These facilities include administration and training facilities, barracks, dining facilities, fitness centers, and childcare centers. The Combined Security Transition Command–Afghanistan (CSTC-A) administers the program's funding and also funds some projects using the Afghanistan Security Forces Fund. According to CSTC-A officials, the program was designed to create an environment where Afghan women in the army and police force can train with minimal interference from individuals who are hostile to women's participation in these organizations. As of May 31, 2018, the Women's Participation Program had funded 13 ANP construction projects valued at \$45.9 million.

This inspection focuses on the design and construction of the ANP women's compound at the Ministry of Interior (MOI) headquarters complex in Kabul, a project CSTC-A funded. On September 15, 2015, the U.S. Army Corps of Engineers (USACE) awarded a firm-fixed-price contract to Afghan Construction Companies Umbrella (ACCU) for approximately \$3 million to develop the site and design and build the compound.<sup>1</sup> The contract required ACCU to construct multiple facilities, including a barrack, a childcare center, a conference center, an administration building, a fitness center, a latrine facility, a laundry facility, a trash collection point, and a stone veneer perimeter wall with entrance gates. On September 24, 2015, USACE issued a notice-to-proceed to ACCU with a planned completion date of February 6, 2017.

USACE issued four contract modifications, which increased the contract's value to approximately \$3.1 million. The modifications included building a sunshade canopy for the childcare center, changing the perimeter wall's location, and changing the parking area's surface from asphalt to concrete. On July 8, 2017, USACE transferred the completed project to CSTC-A, and on August 24, 2017, CSTC-A transferred the facilities to the MOI. The 1-year warranty for the compound expired on June 18, 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 work in Kabul, Afghanistan, from September 2017 through October 2018, in accordance with the *Quality Standards for Inspection and Evaluation*, published by the Council of the Inspectors General on Integrity and Efficiency. The engineering assessment was conducted by our professional engineers in accordance with the National Society of Professional Engineers' *Code of Ethics for Engineers*. Appendix I contains a detailed description of our scope and methodology.

## THE ANP WOMEN'S COMPOUND WAS GENERALLY BUILT TO CONTRACT REQUIREMENTS, BUT USACE DID NOT DETECT SEVEN CONSTRUCTION DEFICIENCIES OR CONSISTENTLY ENFORCE ITS QUALITY CONTROL PROCESS

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We visited the ANP women's compound on November 15, 2017, five times from March 5 through 17, 2018, and on April 8 and 23, 2018. We found that ACCU generally constructed the facilities in accordance with the contract requirements. For example, photo 1 shows the barrack, which ACCU constructed according to floor plans and with the specified number of rooms. Further, all windows, doors, and heating and cooling units were installed and working properly, with the exception of doors that did not have the required thumb latches on the inside. As another example, we found that the administration building contained the required number of offices, and each office was built as designed. We also found that the heating, cooling, and electrical systems in the buildings were installed and working properly. In addition, the latrine facility contained the required number of toilets and sinks, and the facility had running water. Further, ACCU constructed the stone veneer

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<sup>1</sup> The contract number is W5J9JE-15-C-0025.

**Photo 1 - Barrack at the ANP Women's Compound**



Source: SIGAR, March 5, 2018

perimeter wall with entrance gates according to contract specifications. Lastly, none of the facilities had visible signs of defects in the floors, walls, or ceilings.

Although the construction generally met contract requirements, we found seven construction deficiencies, one involving the substitution of fire extinguishers. These deficiencies have created safety hazards and resulted from ACCU's failure to follow the technical specifications in the contract and, in some cases, the design drawings, as well as from USACE's inadequate oversight.

## **SIGAR Identified Seven Construction Deficiencies, Which USACE Corrected during the Warranty Period**

During our 2017 and 2018 site visits, we found seven construction deficiencies where ACCU did not comply with technical specifications or design drawings in its construction of the ANP women's compound. For example, although required, the doors to rooms in the barrack did not include the thumb latch or any other interior locking mechanism, which places occupants at risk for intrusion. As another example, ACCU did not install the required tags on cables in the communication manholes, which can create a safety hazard for maintenance workers.<sup>2</sup> Table 1 describes each of the seven construction deficiencies.

**Table 1 - Construction Deficiencies SIGAR Identified at the ANP Women's Compound**

| <b>Construction Deficiency</b>   | <b>Description</b>   |
|--|--|
| 1. ACCU substituted carbon dioxide fire extinguishers for dry chemical fire extinguishers. | The contract's technical specifications required ACCU to install 18 fire extinguishers at specified locations within the newly constructed facilities. The technical specifications required, and USACE approved ACCU's submittal for, multi-purpose, dry chemical fire extinguishers to be installed. However, we found that ACCU substituted carbon dioxide extinguishers in 17 locations where dry chemical fire extinguishers were required. Carbon dioxide fire extinguishers are only used to put out electrical fires and fires involving combustible liquids, not other types of fires. The absence of dry chemical fire extinguishers places building occupants at greater risk should another type of fire occur. We also found that one location in the fitness center did not contain a fire extinguisher, which might have been removed after installation. |
| 2. ACCU did not install the thumb latches to lock the barrack doors from the inside.       | Although the door to each room in the barrack locks from the outside, the construction contract also required a thumb latch for an occupant to lock the door from the inside. However, we found that ACCU did not install thumb latches or any other kind of inside locking mechanism on the doors. An occupant's inability to lock the door to her room from the inside increases the risk of intrusion.  |

<sup>2</sup> A communication manhole is a covered hole in the ground that provides access to telephone and internet cables.

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3. ACCU did not install cable racks in the communication manholes.

The contract's technical specifications and design drawings required cables to be supported by galvanized metal cable racks installed on the walls of the communication manholes. These racks were to have a plastic coating over the galvanized metal and be equipped with adjustable hooks and insulators.<sup>a</sup> However, as shown in photo 2, ACCU did not install cable racks, and the cables hang loosely. As a result, the cables may sit in rainwater and be a safety risk for maintenance workers.

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**Photo 2 - Communications Manhole With No Cable Racks**



Source: SIGAR, April 23, 2018

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4. ACCU did not tag the cables in the communication manholes and terminals.<sup>b</sup>

The contract's technical specifications required each cable in each manhole and terminal to be identified by metal tags. The tags should note the cable type, conductor size, circuit number, circuit voltage, cable destination, and phase identification. However, ACCU did not affix any cable tags, potentially resulting in more time needed to identify cables during system maintenance. In addition, the absence of tags can create a safety hazard for maintenance workers.

5. ACCU installed temperature and pressure relief valves on water heaters in two buildings without the required drainpipe.

ACCU installed temperature and pressure relief valves on water heaters in the administration building and fitness center without a drainpipe extending to a floor drain, as required by the design drawings. Without the drainpipe, a maintenance worker could suffer injury from a blast of hot water when water pressure builds up within the heaters.

6. ACCU covered the underground water line valves with concrete, making them inaccessible for maintenance.

The compound's underground water lines have valves, which are needed to shut off the water during maintenance, as the contract required. However, we found that ACCU covered the valves with concrete. Concrete is needed to support the valves, but it should not cover them. As a result, the valves cannot be maintained or easily replaced.

7. ACCU did not construct the concrete curbs in the childcare center's shower stalls.

The as-built drawings indicated that ACCU constructed concrete curbs in the shower rooms of the childcare center. These curbs keep the water from spreading outside of the shower stalls. However, we found that ACCU did not install the shower curbs. As a result, when the showers are used, water may pond on the floor adjacent to the showers, which could be a safety hazard.

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Source: SIGAR engineering analysis

Notes:

<sup>a</sup> Galvanizing is a process of applying a thin coating of zinc over metal to protect it from corrosion. Cable rack insulators are porcelain pieces used to mount and organize the cables in manholes.

<sup>b</sup> A communication terminal is a device at which a signal enters or leaves a network.

On May 30, 2018, we provided USACE a list of the seven construction deficiencies so USACE could direct ACCU to take corrective action before the warranty ended on June 18, 2018. We also informed USACE that we found four other items that had been installed under the construction contract, but were not operating properly at the time of our site visits. These items were not deficiencies at the time USACE turned the project over to CSTC-A, but they were warranty items. Specifically, we found:

- One electric heater in the administration building and four heaters in the fitness center were not operational;
- The gas stove in the childcare center was not operational;
- The heating, ventilation, and air conditioning system in the fitness center was not operating properly, which caused an air imbalance that made it difficult to open and close the windows and doors; and
- Water pipes in the women's barrack were leaking.

On June 10, 2018, USACE provided us with a written response to the list of deficiencies and stated that it would direct ACCU to take corrective action if the deficiencies were valid. USACE also stated that it would send its local national quality assurance representative to the site to take photos and investigate the deficiencies. On July 20, 2018, USACE provided us with documentation, including photos, confirming that the seven deficiencies were valid and showing that ACCU had taken corrective action to address four of them along with the four items with operational issues. Then, on August 28, 2018, USACE provided us with documentation and photos approving ACCU's material requests and confirming that the contractor had installed those materials to correct the remaining three deficiencies.

## USACE Did Not Enforce All Aspects of Its Quality Control Inspection Process

Although we found that USACE executed many of its quality assurance responsibilities during the project, USACE did not consistently enforce all aspects of its required three-phase quality control inspection process for the ANA women's compound project. USACE incorporated a requirement for ACCU to follow the three-phase inspection process into the contract's technical specifications.<sup>3</sup> This process is designed to help contractors and USACE detect and correct construction deficiencies, such as the seven deficiencies we identified.

USACE's three-phase quality control inspection process required ACCU to identify every definable feature of work in its quality control plan.<sup>4</sup> ACCU created 41 definable features of work as part of its quality control program, including asphalt work, plumbing work, utilities work, and painting. The contractor is supposed to track and document these definable features of work for the three phases of construction: preparatory, initial, and follow-up.<sup>5</sup> As part of this requirement, ACCU was required to send USACE minutes from meetings held during the preparatory and initial phases, and daily status reports for the follow-up phase, and USACE was required to maintain the minutes.

All of the deficiencies we found were for work covered under definable features of work. Specifically, the thumb latch for the inside of the doors to rooms in the barrack was covered under the door hardware definable feature of work, while the connection of temperature and pressure relief valves with drainpipes, the cable racks in communication manholes, the tags for cables in the communication manholes, and the underground

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<sup>3</sup> USACE, Technical Specifications section 01 45 00, "Contractor Quality Control," Contract No. W5J9JE-15-C-0025, awarded to ACCU, September 10, 2015.

<sup>4</sup> A definable feature of work is separate and distinct from other tasks and has separate control requirements. For example, each definable feature of work may involve a particular test or tests, such as tests of concrete compression strength.

<sup>5</sup> The preparatory and initial phase inspection meetings include the contractor's quality control staff, the foreman responsible for the definable feature of work, and a USACE quality assurance representative. The meetings take place before (preparatory phase) and at the beginning (initial phase) of the definable feature of work's construction or installation, and are intended for the participants to review and discuss whether the contractor is prepared to perform the work safely and in accordance with contract requirements. The follow-up phase consists of daily checks to ensure compliance until the construction or installation of the definable feature of work is completed.

water line valves were covered under other definable features of work. USACE provided us preparatory meeting minutes for just 17 of the 41 definable features of work for the project, including the door hardware definable feature of work. However, those meeting minutes did not mention the requirement for thumb latches, and USACE could not provide any of the preparatory meeting minutes for the definable features of work that covered the other six deficiencies. Further, USACE could not provide initial meeting minutes for any of the 41 definable features of work. Therefore, SIGAR could not determine whether these required meetings even occurred. Regarding the follow-up phase, USACE did provide us copies of ACCU's daily quality control reports for 97 percent of the working days from September 25, 2015, the day after the notice to proceed, to the project's completion on June 18, 2017. These daily reports contained documentation of required inspections and tests. This indicates that ACCU was generally successful in executing the follow-up phase. Despite this, ACCU completed the project and USACE accepted it without identifying any of the seven deficiencies we found.

The importance of holding the preparatory and initial meetings and documenting the minutes is best demonstrated by an example of a meeting that led to a positive outcome. On November 8, 2016, USACE and ACCU held a preparatory meeting to discuss a definable feature of work for steel doors, frames, and windows. During the meeting, USACE's quality assurance representative realized and advised ACCU that the fire doors it had purchased were not labeled or certified as required. Although ACCU had already installed some of the non-certified fire doors, it subsequently purchased and installed certified fire doors. USACE's action on the fire-rated doors shows that when properly followed, its three-phase inspection process is effective and provides good quality assurance. Further, USACE's own guidance states that follow-up inspections become more productive when they are preceded by thorough preparatory and initial phases.

## **MOST FACILITIES ON THE WOMEN'S COMPOUND ARE BEING USED AND MAINTAINED, BUT FUTURE MAINTENANCE IS A CONCERN**

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### **Although Most Facilities Are Being Used, Some Are Not Being Fully Used and Some Lack Furniture and Equipment**

During our seven site visits in March and April 2018, we found that most of the facilities on the ANP women's compound were being used, but some of those facilities were only being partially used, and others were not being used at all. For example, we found that the family response unit was using the administration building, and that the latrine facility, laundry facility, trash collection point, and entrance gates were being used. We also found that the childcare center was furnished and being used. In addition, the MOI's ANP education directorate was using two rooms in the barrack for office space, leaving the rest of the barrack vacant. We did not observe any women being housed in the barrack. A senior official with the MOI Gender Directorate stated that the ministry was temporarily using the barrack as office space because the family response unit was using the administration building.

Further, we found that the conference and fitness centers were not being used. According to MOI's Deputy Director for Violence Against Women, the conference and fitness centers were not being used primarily because they lacked furniture and equipment. A senior official with the MOI Gender Directorate stated that, on November 20, 2017, a request was made to the MOI Logistics Directorate to purchase the required furniture and equipment for the compound, but, for the most part, these items still have not been purchased. Camp Resolute Support's senior Gender Advisor Group officials stated that the MOI's procurement process is slow. The officials also stated that they do not believe the MOI is indifferent to supporting the ANP women, but that the ministry has competing priorities for limited funds, there have been five ministers in 5 years, and ministry plans change. This has resulted in a lack of prompt decision-making and procurement delays.

The ANP women's compound was built with the expectation that it would be dedicated solely to women and used to support women's training and operations within the ANP. Senior officials with the Gender Advisor Group told us that the MOI is still deciding how to best use the compound's facilities. They also stated that

although the MOI can bring in female police to train on the compound, training is not its primary purpose. According to these officials, the compound's primary purpose is to serve as a first stop for reporting domestic abuse to a family response unit. The Violence Against Women Office, which falls under the MOI's Criminal Investigation Division, manages the family response unit. A senior official with the MOI Gender Directorate stated that women's rights awareness training will take place on the compound for female police and other MOI female staff to support family response units. At the time of our site visits, we found that the compound was reserved exclusively for activities supporting the family response unit and female police. We did not observe any activity on the compound supporting male police.

## **The Compound's Facilities Are Generally Being Maintained, but the Lack of a Contract Raises Concerns about Future Maintenance**

We found that the ANP women's compound is generally being well maintained. During our site visits, we found that the doors, windows, sinks, and toilets were in good repair and functioning. Lighting and electrical fixtures were working properly, and ACCU fixed the non-operational items we found during our inspection and brought to USACE's attention, such as the gas stove in the childcare center and some electric heaters, during the warranty period. We found a dirty toilet and a broken door handle, but these items were exceptions. In March 2018, Gender Advisor Group officials told us that there had been some maintenance issues at the compound, including dirty floors, the smell of urine, and the lack of basic necessities like toilet paper, paper towels, and hand soap, but we did not observe any of those issues during our site visits.

USACE stated that since the project has been completed and transferred to the Afghan government, the MOI is responsible for planning for the compound's maintenance through its facilities directorate and a maintenance contract. Although we found that the facilities directorate is maintaining the women's compound, there is no maintenance contract in place. However, a senior CSTC-A official stated that there are plans to award two maintenance contracts, which the official said could be in place by the end of 2018. One will be a CSTC-A-managed follow-up contract to the current national maintenance contract that supports the MOI headquarters compound, and the other will be awarded by the MOI. Current plans indicate that the MOI will have responsibility for the ANP women's compound under its maintenance contract. CSTC-A emphasized that it is important to transfer greater responsibility to the MOI as part of the capacity-building mission. However, CSTC-A acknowledges that there is a higher risk of failure when the MOI takes on responsibility through its own contracts, but accepting measured risk is necessary as the Afghanistan government matures.

## **CONCLUSION**

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Overall, the ANP women's compound at the MOI headquarters is well built and complies with contract requirements. Although we identified seven construction deficiencies and four items that were installed but not working properly, it was encouraging that USACE took immediate action and directed ACCU to correct all of these items during the warranty period. However, during the construction and warranty period, USACE did not consistently enforce its three-phase quality assurance inspection process with ACCU or document most of the required preparatory and initial meeting minutes for the project's definable features of work, if those meetings even occurred. If USACE had followed its three-phase process and required ACCU to document meetings as required, USACE might have identified the deficiencies that we found.

Although the ANP women's compound is used, it is not being used to capacity. Some key facilities, such as the barrack and conference center, are either only partially being used or not being used at all. In addition, it has been over a year since CSTC-A transferred the compound to the Afghan government, but the MOI is still trying to decide how to best use the compound's facilities and has not purchased furniture or equipment for some facilities. With a few minor exceptions, the women's compound is being maintained, but the lack of a maintenance contract raises concerns about the compound's maintenance in the long term, particularly when

the MOI starts to use the facilities more. Unless the ministry addresses these challenges, the \$3.1 million U.S. investment in the compound could be at risk.

## RECOMMENDATIONS

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To enhance USACE's oversight of reconstruction projects in Afghanistan, we recommend that the USACE Commanding General and Chief of Engineers:

- 1. Enforce requirements for USACE personnel to adhere to the organization's three-phase quality assurance inspection process, including requiring the contractor to conduct all meetings during the preparatory and initial phases for each of the definable features of work under the contract, and document the minutes of those meetings.**

## AGENCY COMMENTS

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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.

USACE concurred with our recommendation and stated that the Transatlantic Afghanistan District's project engineers and construction representatives are taking steps to ensure that the three-phase inspection process is fully executed. In its comments, USACE stated that personnel with full knowledge of the technical area being addressed will conduct and document technical inspections to ensure that effective quality assurance oversight can be verified and demonstrated. USACE also stated that all USACE resident offices in Afghanistan have provided training sessions to local national quality assurance personnel covering three-phase inspections to ensure that there is strict compliance with the three-phase quality inspection process. USACE further stated that it is recruiting Afghan engineers to establish an Afghan Quality Assurance Team whose responsibilities will include attending three-phase inspections for critical definable features of work on all projects. This recommendation will remain open until USACE provides documentation to support the actions it has taken.

## 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 located at the Afghan Ministry of Interior (MOI) headquarters in Kabul, Afghanistan. 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, quality assurance and quality control reports, and other relevant project documentation;
- visited the site on November 15, 2017, five times from March 5 through 17, 2018, and again on April 8 and 23, 2018; and
- interviewed officials from the U.S. Army Corps of Engineers, Combined Security Transition Command–Afghanistan, the Camp Resolute Support Gender Advisor Team, the MOI's Afghan Violation Against Women Group, the MOI Facility Department, and the MOI Gender Directorate regarding facility construction, use, and maintenance.

We did not rely on computer-processed data in conducting this inspection. However, we considered the impact of compliance with laws and fraud risk.

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 at the MOI headquarters during seven site visits in March and April 2018.<sup>6</sup> We developed a standardized engineering evaluation checklist covering items required by the contract and design/specification documents. Our checklist required our partners to analyze the contract documents, scope of work, technical specifications, and design drawings.

We compared the information our Afghan civil society partners provided 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 the Afghan 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;
- referred any potential fraud or illegal acts to SIGAR's Investigations Directorate, as appropriate;
- monitored our partners' progress in meeting milestones and revised contract delivery dates as needed; and
- conducted oversight of them 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, Afghanistan, from September 2017 through October 2018. 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. The engineering assessment was conducted by our professional engineers 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.

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<sup>6</sup> We conducted the first site visit on November 15, 2017, without our Afghan partners.

## 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

16 OCT 2018

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report (Project Code SIGAR-I-049), Afghan National Police Women's Compound at the Ministry of Interior: Construction Generally Met Requirements, but Use and Maintenance Remain Concerns

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

Dear Mr. Sopko:

The U.S. Army Corps of Engineers (USACE) concurs with your recommendation in subject report.

Recommendation 1: Enforce requirements for USACE personnel to adhere to the organization's three-phase quality assurance inspection process, including requiring the contractor to conduct all meetings during the preparatory and initial phases for each of the definable features of work under the contract, and document the minutes of those meetings.

USACE Response to Recommendation 1: Concur. Transatlantic Afghanistan District project engineers and construction representatives are taking steps to ensure that the three-phase inspection process is fully executed. Technical inspections will be conducted by personnel with full knowledge of the technical area being addressed and documented to ensure effective quality assurance oversight can be verified and demonstrated. All USACE resident offices in Afghanistan have provided training sessions to Local National Quality Assurance personnel covering three-phase inspections to ensure strict compliance with the three-phase quality inspection process. Furthermore, USACE is recruiting Afghan engineers to establish an Afghan-Quality Assurance Team whose responsibilities include attending three-phase inspections for critical definable features of work on all projects.

My point of contact for this response is Mr. George Sullivan, Transatlantic Division Internal Review Auditor. He may be reached by e-mail at [George.a.sullivan@usace.army.mil](mailto:George.a.sullivan@usace.army.mil) or by telephone at 202-761-4573.

Sincerely,

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

MARK C. QUANDER  
Colonel (P), EN  
Commanding

## APPENDIX III - ACKNOWLEDGEMENTS

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Steven Haughton, Senior Inspection Manager

William Shimp, Inspector-in-Charge

Javed Khairandish, Engineer

Wilhelmina Pierce, Professional Engineer

Abdul Rahim Rashidi, Program Analyst

This inspection was conducted  
under project code SIGAR I-049.

## SIGAR's Mission

The mission of the Special Inspector General for Afghanistan Reconstruction (SIGAR) is to enhance oversight of programs for the reconstruction of Afghanistan by conducting independent and objective audits, inspections, and investigations on the use of taxpayer dollars and related funds. SIGAR works to provide accurate and balanced information, evaluations, analysis, and recommendations to help the U.S. Congress, U.S. agencies, and other decision-makers to make informed oversight, policy, and funding decisions to:

- improve effectiveness of the overall reconstruction strategy and its component programs;
- improve management and accountability over funds administered by U.S. and Afghan agencies and their contractors;
- improve contracting and contract management processes;
- prevent fraud, waste, and abuse; and
- advance U.S. interests in reconstructing Afghanistan.

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- Phone Afghanistan: +93 (0) 700-10-7300
- Phone DSN Afghanistan: 318-237-3912 ext. 7303
- Phone International: +1-866-329-8893
- Phone DSN International: 312-664-0378
- U.S. fax: +1-703-601-4065

## Public Affairs

Public Affairs Officer

- Phone: 703-545-5974
- Email: [sigar.pentagon.ccr.mbx.public-affairs@mail.mil](mailto:sigar.pentagon.ccr.mbx.public-affairs@mail.mil)
- Mail: SIGAR Public Affairs  
2530 Crystal Drive  
Arlington, VA 22202