

SIGAR

**Special Inspector General for
Afghanistan Reconstruction**

SIGAR 20-15 Inspection Report

**Afghan National Police Women's Compound at the
Herat Regional Training Center: Construction
Deficiencies Exist, and the \$3.1 Million Compound
Has No Electricity and Has Never Been Used**



**DECEMBER
2019**



SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

December 19, 2019

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Secretary of Defense

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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 Herat Regional Training Center (RTC). On September 21, 2016, the U.S. Army Corps of Engineers (USACE) awarded a \$3.1 million firm-fixed-price contract to Assist Consultants Inc. (ACI) to design and build a compound to train 100 female students in the ANP. The contract required ACI to construct a three-story multi-purpose building, a dining facility, an outdoor playground, a well house, a pump house, and a wastewater treatment plant, and to connect the compound to the city’s electrical distribution system. USACE issued the notice to proceed on October 23, 2016, and extended the completion date from April 16, 2018, to June 1, 2018, after four modifications.

During our January 2019 site visits, we found that ACI had completed construction of the women’s compound at Herat RTC. However, we also found four construction deficiencies: (1) the compound was not connected to any power source, (2) cable identification tags in electrical manholes and in a handhole were missing,¹ (3) flexible duct connectors for exhaust fans were missing, and (4) a non-durable sniper screen was not installed. These deficiencies primarily resulted from ACI not following the contract requirements or USACE not providing adequate contract enforcement. We notified USACE of the deficiencies so ACI could take corrective action before the warranty expired on May 28, 2019. USACE provided documentation showing that ACI corrected one of the deficiencies by installing a new sniper screen to replace the non-durable one previously installed. However, as of the date of this report, USACE had not provided documentation showing that ACI corrected the remaining three deficiencies. Because the compound did not have electricity, we could not fully inspect the electrical, mechanical, and plumbing systems. As a result, additional deficiencies could also exist.

We also found that project closeout did not follow contract specifications or the Combined Security Transition Command–Afghanistan (CSTC-A) procedures. Specifically, some facilities were not complete and ready for occupancy when USACE transferred the compound to CSTC-A. In addition, USACE completed pre-final inspections after accepting the facilities from ACI and transferring to CSTC-A on May 28, 2019. The pre-final

¹ A handhole is “an enclosure for use in underground systems...sized to allow personnel to reach into, but not enter, for the purpose of installing, operating, or maintaining equipment or wiring or both.” National Electric Code, 2014 Edition, p. 31.



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inspections identified 192 deficiencies. For example, ACI had not finished installing heat pumps in the multi-purpose building. USACE and ACI also started the warranty on some equipment and life safety systems, such as the fire alarm system, before ACI completed or tested them. As a result, these items received less than 1 year of warranty coverage. Although the systems were installed and under warranty at the time of our January 2019 site visits, we could not fully inspect them due to the lack of electricity.

Finally, we found that the ANP women's compound at the Herat RTC has never been occupied. As a result, none of the facilities have been used since CSTC-A transferred them to the ANP in August 2018. Absent additional information regarding the future use of the compound, the value of the \$3.1 million U.S. investment is in question.

We are making one recommendation in this report. We recommend that the CSTC-A Commander notify the Afghan Ministry of Interior of the construction deficiencies we identified at the women's compound in Herat and advise the ministry to take whatever action it deems appropriate to (a) connect the compound to a local electrical power source; (b) install cable identification tags in the manholes and handhole; and (c) install flexible duct connectors on the exhaust fans.

We provided a draft of this report to the Department of Defense for review and comment. CSTC-A and USACE provided written comments, which are reproduced in appendices III and IV, respectively. CSTC-A partially agreed with our recommendation, stating that it would (1) advise the Afghan Ministry of Interior that the compound has not been connected to the local electrical power source; (2) work with the Ministry of Interior to develop and execute a plan to ensure proper usage of the compound; and (3) contact ACI, and potentially the Ministry of Interior, about correcting the deficiencies. Although we made no recommendation to USACE, USACE's comments disputed whether ACI's failure to connect the compound to the local power source constituted a construction deficiency. USACE also raised other concerns, each of which we address later in this report. We consider CSTC-A's proposed actions to be responsive and sufficient to address our recommendation, but will keep the recommendation open until SIGAR receives appropriate documentation to verify that action was taken.

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

ACI	Assist Consultants Inc.
ANP	Afghan National Police
CSTC-A	Combined Security Transition Command–Afghanistan
MOI	Ministry of Interior
RTC	Regional Training Center
USACE	U.S. Army Corps of Engineers

The NATO Resolute Support Mission, through the Combined Security Transition Command–Afghanistan (CSTC-A), provides funds to design and construct facilities for women in the Afghan National Army and Afghan National Police (ANP).² These facilities typically include administration and training facilities, barracks, dining facilities, fitness centers, prayer rooms, and childcare centers. According to CSTC-A officials, such facilities are needed to create an environment where women in the Afghan National Army and ANP can train with minimal interference from individuals who are hostile to women’s participation in these organizations.

On September 21, 2016, the U.S. Army Corps of Engineers (USACE) awarded a \$3.1 million firm-fixed-price contract to Assist Consultants Inc. (ACI), an Afghan company, to design and build a compound at the Herat Regional Training Center (RTC) to train 100 female students for the ANP.³ The contract required ACI to construct a three-story multi-purpose building, a dining facility, an outdoor playground, a well house, a pump house, and a wastewater treatment plant, and to connect the compound to the city’s electrical distribution system. The multi-purpose building’s first floor consists of an entrance lobby, security office, fitness center, administration space, conference room, medical clinic, and daycare for up to 62 children. The second floor consists of barracks with an individual latrine, laundry room, computer room, four classrooms, and a common area with a tea kitchen. The third floor consists of barracks and common latrines.

USACE issued the notice to proceed on October 23, 2016, and the required completion date was April 16, 2018. USACE issued four contract modifications: three administrative modifications and one modification that extended the completion date to June 1, 2018. These modifications did not change the contract value. USACE transferred the project to CSTC-A on May 28, 2018, and the 1-year construction warranty period ended on May 28, 2019. USACE and ACI conducted pre-final inspections from May to July 2018; the final inspection was on August 9, 2018, more than 2 months after the warranty period began. CSTC-A transferred the facilities to the ANP on August 11, 2018.

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

We conducted our work in Kabul and Herat, Afghanistan, from August 2018 through November 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.

ALTHOUGH ACI COMPLETED THE WOMEN’S COMPOUND AT THE HERAT RTC, CONSTRUCTION DEFICIENCIES EXIST, AND USACE AND CSTC-A DID NOT FOLLOW REQUIRED CLOSEOUT PROCEDURES

We visited the ANP women’s compound at the Herat RTC on January 28 and 30, 2019, and found that ACI had completed construction of the compound. For example, we found that the fitness room in the multi-purpose building, well house, and outdoor playground were completed. However, we also found four construction deficiencies, including one that has created a safety hazard:

1. Incomplete electrical connection to the local electrical power source;
2. Missing cable identification tags in electrical manholes and a handhole;

² The U.S. Army Corps of Engineers contracts and other documents we have reviewed cumulatively referred to these individual efforts since 2016 as supporting the Women’s Participation Program. In the July 2019 SIGAR Quarterly Report, CSTC-A reported 14 Women’s Participation Program projects valued at \$146 million.

³ The contract number is W5J9JE-16-C-0035. CSTC-A funded this contract using the Department of Defense’s Afghanistan Security Forces Fund.

3. Missing flexible duct connectors for exhaust fans; and
4. A deficient sniper screen.⁴

These deficiencies primarily resulted from ACI not following contract requirements, or USACE not providing adequate contract enforcement.

On May 9, 2019, we notified USACE of the deficiencies so USACE could direct ACI to take corrective action before the construction warranty expired on May 28, 2019. In a written response, USACE stated that it would direct ACI to take corrective action. USACE gave us photos showing that ACI corrected one of the deficiencies before the warranty expired: ACI installed a new sniper screen to replace the non-durable one previously installed. However, as of the date of this report, USACE has not provided us with any evidence that ACI corrected the remaining three deficiencies. In addition, because the compound did not have electricity, we could not fully inspect the electrical, mechanical, and plumbing systems. As a result, additional deficiencies could exist.

We found that project closeout did not follow the contract's specifications and CSTC-A's procedures. Specifically, some facilities were not complete and ready for occupancy when USACE transferred the facilities to CSTC-A. Further, USACE and ACI did not correctly follow the contract's warranty implementation process.

ACI Did Not Connect the Women's Compound to an Electrical Power Source

During our January 2019 site visits, we found that the women's compound had no power. The construction contract required ACI to connect the ANP women's compound at the Herat RTC to the existing local electrical power source. USACE confirmed the requirement during the design phase and directed ACI to provide design details for the connection. ACI was supposed to make the connection before the June 1, 2018, contract completion date.

During the June 2, 2018, pre-final inspection for the electrical connection, USACE's local national quality assurance personnel issued a deficiency notice because ACI had not yet completed the work. At the August 9, 2018, final inspection, USACE noted that ACI pulled the cable to the nearest city power junction, but stated that the ANP would not allow ACI to make the connection to city power. Because of this, USACE said it released ACI from any further responsibility for the connection. However, in January 2019, the ANP Head of Operations and Maintenance told us that ACI did not make the connection because it never obtained an authorization to do so from Da Afghanistan Breshna Sherkat, the Afghan electrical power company. This conflicting information prevented us from determining why ACI failed to meet its contractual obligation before the contract completion date. Nevertheless, it is clear that ACI did not take steps to complete the work during the warranty period. As of August 2019, we found that the compound was still without electricity.

ACI Did Not Install Cable Identification Tags in the Manholes and Handholes

The contract required ACI to install identification tags for each power cable located in the manholes and handholes throughout the compound. The identification tags provide information necessary to readily identify each cable for maintenance and repairs. While ACI was supposed to install cable identification tags to be clearly visible, we found that ACI did not install the tags in two of the compound's six manholes and one of its five handholes. In August 2019, USACE told us the panel board wiring was labeled, but it did not address the cable identification requirement for the manholes and handholes. Should the women's compound receive power, as intended, the lack of tags to identify the proper cables will make it difficult for maintenance staff to identify and troubleshoot the appropriate cable when an issue occurs.

⁴ A handhole is "an enclosure for use in underground systems... sized to allow personnel to reach into, but not enter, for the purpose of installing, operating, or maintaining equipment or wiring or both." National Electric Code, 2014 Edition, p. 31. The sniper screen is a fabric screen installed on the compound's fence to limit visibility in an area.

ACI Did Not Install Flexible Duct Connectors on the Exhaust Fans

The contract required ACI to install flexible duct connectors where sheet metal exhaust ducts connect to exhaust fans.⁵ However, during our January 2019 site visits, we found that ACI did not install flexible duct connectors for the exhaust fans in the multi-purpose building or the dining facility. In August 2019, USACE told us that ACI had acquired the flexible duct connectors for the exhaust fans and was installing them. As of the date of this report, USACE has not given us evidence that ACI installed the connectors. The connectors' absence could cause the ducts to vibrate and damage the exhaust system, potentially reducing the lifespan of the system.

USACE and CSTC-A Did Not Follow Required Transfer, Acceptance, and Warranty Procedures

The construction contract required USACE to perform the pre-final inspection and verify that the women's compound facilities were complete and ready for occupancy before accepting them from ACI. The contract also required the USACE contracting officer to schedule the final inspection after ACI corrected all deficiencies identified during the pre-final inspection and completed all remaining work. CSTC-A's asset turnover procedures require this process to be completed before USACE and CSTC-A sign the DD Form 1354, "Transfer and Acceptance of DOD Real Property." In addition, the USACE Afghanistan Engineer District's *District-Level Quality Assurance Plan for Construction* states the transfer of construction to the using agency via a signed DD Form 1354 is simultaneous with the acceptance of that construction from the contractor.⁶ Further, CSTC-A's *Asset Recognition and Turnover to Afghan National Defense Security Forces* procedures state that USACE's responsibility as the execution agent is to turn over a completed facility and ensure that deficiencies are corrected before turnover to CSTC-A.⁷

In a May 28, 2018, letter to ACI, USACE stated that the project was "substantially complete" based on USACE's pre-final inspection completed that day.⁸ USACE also ended ACI's performance period that day because USACE's contracting officer's representative and contracting officer both determined that the required construction was substantially complete. USACE and CSTC-A signed the DD Form 1354 on May 28, 2018, and CSTC-A accepted the project the same day. However, neither USACE's nor ACI's daily reports documented a pre-final inspection on May 28, 2018, as described in USACE's letter. Instead, USACE's and ACI's daily reports for that day documented ongoing construction. Photo 1 shows the multi-purpose building still under construction and not ready for occupancy, even on the following day, May 29, 2018.

Photo 1 - Multi-purpose Building Not Ready for Occupancy



Source: USACE, May 29, 2018

⁵ A flexible duct connector is an air-tight flexible joint that isolates the equipment vibration, and is inserted between the equipment and the ductwork.

⁶ USACE, Afghanistan Engineer District South, *District-Level Quality Assurance Plan for Construction*, updated August 9, 2012, p. 32.

⁷ CSTC-A CJ-ENG, *Standing Operating Procedure for Asset Recognition and Turnover of Afghan National Defense Security Forces*, February 2018, p. 3.

⁸ According to USACE's *Contract Administration Manual for Construction Contracts*, "substantially complete" means that most of the contract items have been completed, the facility and systems are functional, and only minor work or deficiencies remain to complete the contract.

On May 29, 2018, USACE and ACI held a planning meeting for the pre-final inspections. Records show that they conducted 11 pre-final inspections of specific project areas beginning May 30, 2018, and continuing through July 24, 2018, based on when ACI completed the construction work. Together, the 11 pre-final inspections, conducted for 2 months after USACE determined that the facilities were substantially complete, identified 192 construction deficiencies.⁹ The deficiencies recorded by USACE and ACI in pre-final inspection punch lists show that construction was not complete when USACE transferred the facilities to CSTC-A and initiated the warranty period. For example, the pre-final and final inspections show that

- ACI did not finish installing heat pumps on the second and third floors of the multi-purpose building until July 8, 2018.
- ACI did not install the dining facility freezer until July 19, 2018.
- ACI did not finish installing the fire alarm system in the multi-purpose building until August 1, 2018.

Furthermore, ACI's quality control reports, USACE's quality assurance reports, and the local national quality assurance inspector's daily project photos show that none of the compound's facilities were complete and ready for the ANP's occupancy at the time USACE transferred the project to CSTC-A and CSTC-A accepted it, on May 28, 2018. Taken together, this indicates that USACE's May 28, 2018, letter inaccurately documented the date of the pre-final inspections and the compound's actual construction status.

On May 28, 2018, USACE also initiated ACI's 1-year warranty period for the project. The contract referenced Federal Acquisition Regulation clause 52.246-21, "Warranty of Construction (March 1994)," which states that the warranty shall continue for 1 year from the date of final acceptance of the work.¹⁰ The contract's specification section on "Closeout Submittals," section 1.4.3 "Pre-warranty Conference," required ACI to meet with USACE representatives before contract completion to discuss the warranty defect notification and response process. However, ACI did not hold the pre-warranty conference until August 6, 2018, more than 2 months after the warranty period started. Further, USACE and ACI started the warranty period on some equipment before ACI installed it and before some life safety systems were fully installed and tested. According to USACE's and ACI's daily reports, items installed by ACI after the warranty period started included the following:

- dining facility kitchen exhaust hood (see photo 2) (installation finished on July 12, 2018) and dining facility doors (see photo 3) (installation finished on July 18, 2018)
- dining facility fire alarm system (installation finished on July 2, 2018)
- multi-purpose building washers and dryers (installation finished on July 19, 2018)
- multi-purpose building fire alarm panel (installation finished on July 12, 2018)

Photo 2 - Dining Facility Exhaust Hood Under Construction



Source: USACE, June 4, 2018

Photo 3 - Dining Facility Door Installation in Progress



Source: USACE, May 29, 2018

⁹ See appendix II for the number of deficiencies identified during each of the pre-final inspections.

¹⁰ Federal Acquisition Regulation, 48 CFR § 52.246-21, "Warranty of Construction," March 1994.

ACI installed equipment and completed and tested for life safety systems after USACE and ACI initiated the 1-year warranty. This delay resulted in the items having less than 1 year of warranty coverage, which does not comply with the Federal Acquisition Regulation.¹¹ In addition, although these systems were under warranty at the time of our January 2019 site visits, we could not fully inspect them to determine whether they were operating properly because the compound was not connected to an electrical power source.

THE ANP WOMEN'S COMPOUND HAS NOT BEEN USED, BUT IS BEING MAINTAINED

During our January 2019 site visits, we found that the ANP women's compound at the Herat RTC had never been used since CSTC-A transferred it to the ANP in August 2018. Although the compound is not occupied, CSTC-A told us that an on-budget Afghan Ministry of Interior (MOI) contract covers the compound's maintenance. We found that the compound was still not connected to a local electrical power source, but we did not find any maintenance issues.

As we reported in July 2019, a Resolute Support Mission Senior Gender Advisor told us that in approximately December 2017, the then Afghan Minister of Interior placed a moratorium on training female ANP recruits at all ANP women's training centers outside of Kabul because the MOI did not consider the centers secure.¹² However, the MOI did not identify their specific security concerns. We also reported that according to both the ANP Commander of the Educational Academy for Women and Resolute Support Senior Gender Advisor, Afghanistan's female police are trained under a special program in Turkey. The gender advisor also told us that the MOI planned to train all female police in Kabul to help establish a national identity and consistency in police practice, but as of December 2018, the plan was still in the discussion phase.

Despite our requests during our inspection of the ANP women's compound at the Jalalabad RTC, neither the Gender Advisor Office nor the MOI provided any written documentation or a formal statement indicating the reasons, timing, or other details of the moratorium. In August 2019, the MOI Gender Human Resources Department told us that the women's compound at the Herat RTC will be used for training in the future for purposes including a noncommissioned officer's course and capacity building. However, the department did not give a timeline for when this training will begin.

CONCLUSION

ACI completed the women's compound at the Herat RTC. Although ACI corrected nearly all of the deficiencies that existed when USACE accepted the facility as substantially complete, we found that at least four construction deficiencies are still present. ACI did not connect the compound to the local electrical power source, install identification tags on cables in the manholes and handholes, or install flexible duct connectors on the exhaust fans. In addition, there could be more deficiencies because without power, we could not fully inspect systems requiring electricity.

USACE transferred, and CSTC-A accepted, the facilities before USACE conducted the pre-final inspections and ACI completed all construction work. Finally, USACE started the warranty period for some equipment and systems that had not been installed or tested. These actions violated CSTC-A procedures and the Federal Acquisition Regulation.

The ANP has not used the women's compound at the Herat RTC since CSTC-A transferred the facilities to them, which puts the U.S. investment in this project at risk of waste. Absent any additional information regarding the

¹¹ Federal Acquisition Regulation, 48 CFR § 52.246-21(b), "Warranty of Construction," March 1994.

¹² See SIGAR, *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*, SIGAR 19-48-IP, July 11, 2019.

future use of the compound, it appears the \$3.1 million spent on the construction will not benefit the ANP women, which was the funding's intent.

RECOMMENDATION

To protect the U.S. taxpayers' investment in the construction of the women's compound at the Herat RTC, we recommend that the CSTC-A Commander:

- 1. Notify the MOI of the construction deficiencies SIGAR identified at the women's compound in Herat and advise the ministry to take whatever action it deems appropriate to**
 - a. connect the compound to a local electrical power source;**
 - b. install cable identification tags in the manholes and handhole; and**
 - c. install flexible duct connectors on the exhaust fans.**

AGENCY COMMENTS

We provided a draft of this report to the Department of Defense for review and comment. CSTC-A and USACE provided written comments, which are reproduced in appendices III and IV, respectively. CSTC-A partially concurred with our recommendation. Although we made no recommendation to USACE, it provided comments on the reported construction deficiencies.

In its comments, CSTC-A stated that it would (1) advise the MOI that the compound has not been connected to the local electrical power source, (2) work with the MOI to develop and execute a plan to ensure proper usage of the compound, and (3) contact ACI, and potentially the MOI, about correcting the deficiencies. We consider CSTC-A's proposed actions to be responsive and sufficient to address our recommendation, but we will keep the recommendation open until SIGAR receives appropriate documentation to verify that action was taken.

In addition, CSTC-A requested that we remove statements from the report that CSTC-A did not follow required transfer, acceptance, and warranty procedures. However, as stated in this report, USACE did not follow the procedures because it accepted construction of the compound and transferred it to CSTC-A before USACE verified that the compound was complete and ready for occupancy, as the construction contract required. CSTC-A also accepted the project before it was ready for occupancy, which is improper based on CSTC-A's own asset turnover procedures.

Although we made no recommendation to USACE, it provided written comments on the construction deficiencies. USACE stated the fact that the compound was not connected to a local electrical power source was the ANP's fault, not ACI's. According to USACE, ACI provided its best and reasonable effort to connect the power, but the ANP would not allow ACI to make the connection. Further, USACE stated that the ANP had agreed to complete the connection. However, according to the ANP Head of Operations and Maintenance, ACI never obtained an authorization to make the connection from the Afghan electrical power company. This conflicting information prevented us from determining exactly why ACI failed to meet its contractual obligation.

USACE also stated that our draft report inaccurately noted that there are four construction deficiencies. USACE advised that there are two remaining deficiencies because (1) the lack of connection to a local electrical power source was not a deficiency, and (2) ACI installed a new sniper screen to replace the non-durable screen originally installed. We agreed with USACE's assessment of the sniper screen and changed this report to state that there are three remaining construction deficiencies. However, as previously stated, we maintain that ACI's failure to make the final connection to the local electrical power source, per the contract, is a construction deficiency.

USACE made two additional comments regarding our draft report. First, USACE disagreed with our statement that we could not fully inspect the compound because it did not have electricity, and, as a result, additional deficiencies could exist. USACE stated that we could have arranged for temporary power generation equipment to aid in our inspection. However, alternative power was not available during our site visit, and, as a result, we maintain that additional deficiencies could exist. Second, USACE disagreed with our assessment that the lack of cable identification tags creates a safety hazard for maintenance staff. Both the contract and the National Electrical Code required ACI to provide identification tags for cables. During maintenance or cable replacement, it is important for workers to know which cables are live and which cables are dead or disconnected. Identification tags help reduce or eliminate the chance that a worker would diagnose and cut the wrong cable. Nevertheless, we agree that if proper procedures are followed prior to conducting maintenance, even without the required identification tags, the risk of harm to workers is mitigated. Therefore, we removed the reference to a safety concern resulting from the lack of cable identification tags from this report.

APPENDIX I - SCOPE AND METHODOLOGY

This report provides the results of SIGAR's inspection of the Afghan National Police (ANP) women's compound at the Herat Regional Training Center. The objectives of this inspection were to determine whether the (1) construction was completed in accordance with contract requirements and applicable construction standards, and (2) 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, the Ministry of Interior Gender Human Resources Department, and ANP officials concerning the project's construction, use, and maintenance; and
- made site visits to the women's compound on January 28 and 30, 2019.

We did not rely on computer-processed data in conducting this inspection. However, we considered compliance with laws and indicators of fraud, other illegal acts, and abuse, 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 January 2019. We developed a standardized engineering evaluation checklist covering items required by the contract. 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 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 Herat, Afghanistan, from August 2018 through November 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 - PRE-FINAL INSPECTION DEFICIENCIES

The U.S. Army Corps of Engineers (USACE) and Assist Consultants Inc. (ACI) conducted 11 pre-final inspections beginning May 30, 2018, and continuing through July 24, 2018. The 11 pre-final inspections identified 192 construction deficiencies. Table 1 lists the number of deficiencies identified during each pre-final inspection.

Table 1 - Deficiencies Identified During Pre-Final Inspections

Pre-Final Inspection	Date of Inspection	Number of Deficiencies
Site water and sewer system	May 30, 2018	20
Electrical and communication utilities	May 31, 2018	25
Connection to city power	June 2, 2018	1
Waste water treatment plant and lift station	June 3, 2018	6
Waste water treatment plant laboratory	June 3, 2018	7
Third floor multi-purpose building	June 4, 2018	28
Pump house and well house	June 10, 2018	17
Second floor multi-purpose building	June 19, 2018	30
First floor multi-purpose building	June 30, 2018	33
Dining facility	July 24, 2018	21
Playground area	July 24, 2018	4
Total Deficiencies		192

Source: USACE quality assurance and quality control reports

APPENDIX III - COMMENTS FROM THE COMBINED SECURITY TRANSITION COMMAND-AFGHANISTAN



UNCLASSIFIED

HEADQUARTERS RESOLUTE SUPPORT
COMBINED SECURITY TRANSITION COMMAND-AFGHANISTAN
KABUL, AFGHANISTAN
APO, AE 09320

CSTC-A

13 November 2019

MEMORANDUM THRU

United States Forces – Afghanistan DCDR-S, APO AE 09356
United States Central Command (CCIG), MacDill Air Force Base, FL 33621

FOR Special Inspector General for Afghanistan Reconstruction (SIGAR), 2530 Crystal Drive, Arlington, VA 22202-3940

SUBJECT: SIGAR I-056 Draft Inspection Report for "Afghan National Police Women's Compound at the Herat Regional Training Center."

1. (U) The purpose of this memorandum is to provide a response to the review of the draft inspection report SIGAR I-056 "Afghan National Police Women's Compound at the Herat Regional Training Center."
2. (U) CSTC-A appreciates the opportunity to respond to this draft inspection report on Afghan National Police Women's Compound at the Herat Regional Training Center and the opportunity to provide feedback.
 - a. (U) CSTC-A requests the statements regarding CSTC-A not following project closeout or transfer, acceptance and warranty procedures be removed from page 2, page 3 and page 6. In accordance with project closeout procedures, CSTC-A was not required to attend the final inspection and, according to the project turnover memo provided to CSTC-A, there were no outstanding punch items remaining when the facility was turned over to CSTC-A and then turned over to GIRoA.
 - b. (U) CSTC-A partially agrees with SIGAR's Recommendation and will advise the MoI that the compound has not been connected to the local electrical power source. In addition, CSTC-A continues to work with the MoI to develop and execute a plan to ensure the proper usage of the compound as intended.
 - c. (U) USACE has contacted ACI about the remaining two items identified in SIGAR's recommendation. If ACI has not corrected the missing identification tags in the two manholes and one handhole identified by SIGAR and installed flexible duct connectors for exhaust fans in the multi-purpose building and the dining facility prior to the compound being occupied, CSTC-A will notify the MoI of the potential issue.

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CSTC-A

SUBJECT: SIGAR I-056 Draft Inspection Report for "Afghan National Police Women's Compound at the Herat Regional Training Center."

3. (U) Point of contact is Ms. Katherine Bootie, External Audit Liaison Manger, Katherine.e.bootie.civ@mail.mil, DSN 318-449-9935.

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KENNETH W. LETCHER
COL (OF-5), U.S. Army
CSTC-A Director of Staff

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



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

SUBJECT: Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report, I-056 Afghan National Police (ANP) Women's Compound at the Herat Regional Training Center Report

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 SIGAR Draft Report, Afghan National Police Women's Compound at the Herat Regional Training Center: Construction Deficiencies Exist, and the \$3.1 Million Compound Has No Electricity and Has Never Been Used. This report contains one recommendation for the Combined Security Transition Command – Afghanistan (CSTC-A) Commander.

Although there are no recommendations for USACE contained in the report, there are observations related to the reported deficiencies described in the report which requires addressing by USACE.

1. Assist Consultants Inc. (ACI) did not connect the ANP Women's Compound to an electrical power source. Although provided with documentation confirming that the ANP prohibited the contractor from connecting the power to the existing commercial power grid, SIGAR continues to consider this a construction deficiency, rather than an activity prohibited by the ANP. Due to this prohibition, USACE instructed the contractor to pull the cabling to the nearest junction for the city power and leave without final terminations. This documentation was provided to SIGAR and documented in the turnover documents.

The contractor provided their best and reasonable effort to connect the power, and should not be expected to work indefinitely until the ANP allows them to make final connection to city power. As evidenced by signatures in the turnover documents, the ANP agreed to complete the action to connect to city power, but didn't follow through. The lack of a connection to city power is an incomplete action on the part of the ANP, and not a construction deficiency on the part of the contractor or USACE.

2. The Draft Report contains inaccurate or misleading statements
 - a. Page 2: SIGAR states that "USACE has not provided us with any evidence that ACI corrected the remaining four deficiencies." USACE contends that four is an inaccurate number. The number of deficiencies should be two. The electrical connection should not be considered a construction deficiency, and the sniper screen deficiency was remediated when the contractor installed new sniper screens. SIGAR acknowledged this correction in the draft report. The two remaining deficiencies are: (1) missing cable identification tags in 2 of 6 manholes and 1 of 5 handholes and (2) missing flexible duct connectors for exhaust fans. The contractor stated they were waiting on installation instructions from the manufacturer and would install the duct connectors once the instructions are received. USACE is working with the contractor and ACI, to correct these deficiencies.
 - b. Page 2: SIGAR states "In addition, because the compound did not have electricity, we could not fully inspect the electrical, mechanical and plumbing systems. As a result, additional deficiencies could exist." USACE objects to the inclusion of this statement. SIGAR was provided with project documentation prior to their site inspection, which included the fact there was no connection to an electrical power source. SIGAR could have inspected the aforementioned systems had they arranged for temporary power generation equipment to be present at the time of their inspection.
 - c. Page 2: USACE does not agree with SIGAR's statement, "the lack of tags to identify the proper cables will be a safety hazard for maintenance staff". Electrical cables are tagged for identification inside electrical manholes as a convenience for facility engineers. Tags allow for fast identification of cable routes and facilitate planning for future work on the electrical system. The system would be checked for tie breakers and cross connections to ensure that no cable could be energized either directly or by induction from adjacent circuits. The lack of cable tags was therefore unintended, and does not inherently pose a health and safety risk, as any such work would involve tracing the complete circuit from the electrical panel, through the service network, and back to the system return at the breaker.

USACE appreciates the opportunity to provide feedback in this reporting process.

Response to Special Inspector General for Afghanistan Reconstruction (SIGAR) Draft Report, I-056 ANP
Women's Compound at the Herat Regional Training Center Report

The proponent for this letter is Ms. Erin K. Connolly, TAD Internal Review
Auditor, at erin.k.connolly@usace.army.mil or 540-665-5348.

Sincerely,

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CHRISTOPHER G. BECK
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APPENDIX V – ACKNOWLEDGEMENTS

Steven Haughton, Senior Inspection Manager

Charles DeCarlo, Inspector-in-Charge

Madeline Krahn, Program Analyst

Mohammad Edrees Dawarie, Program Analyst

Wilhelmina Pierce, General Engineer

Shahanshah Shirzay, Engineer

This inspection was conducted
under project code SIGAR-I-056.

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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