2 SIGAR OVERSIGHT
SIGAR OVERSIGHT CONTENTS

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SIGAR staff volunteers serve lunch at the U.S. Embassy Kabul after locally employed staff were unable to work on the compound due to COVID-19 precautions. (SIGAR photo)
This quarter, SIGAR issued 11 products. SIGAR work to date has identified approximately $3.3 billion in savings for the U.S. taxpayer.

SIGAR issued one performance-audit report this quarter, reviewing the Department of Defense’s (DOD) $174 million ScanEagle Unmanned Aerial System program, and one evaluation report reviewing the status of SIGAR recommendations made to the United States Agency for International Development (USAID) over the past five years. SIGAR also issued two inspection reports examining the construction of the Afghan National Army and Train Advise Assist Command–Air Joint Air Force Hangar I Complex, and security upgrades at the Ministry of Interior headquarters complex.

SIGAR completed six financial audits of U.S.-funded projects to rebuild Afghanistan that identified $9,141,944 in questioned costs as a result of internal-control deficiencies and noncompliance issues. These financial audits covered a range of topics including the State Department’s Antiterrorism Assistance Program, support for humanitarian mine action and conventional-weapons destruction, and USAID’s Afghanistan Health Sector Resiliency Project.

This quarter, SIGAR’s Office of Special Projects issued one report examining increased costs incurred by U.S. contractors in Afghanistan as a result of inconsistent work visa policies and fees.

During the reporting period, SIGAR criminal investigations resulted in three criminal charges and two guilty pleas. SIGAR initiated three new cases and closed eight, bringing the total number of ongoing investigations to 123.

AUDITS
SIGAR conducts performance and financial audits of programs and projects connected to the reconstruction effort in Afghanistan. This quarter, SIGAR has 18 ongoing performance audits and 38 ongoing financial audits.

Performance Audit Reports Issued
This quarter, SIGAR issued one performance-audit report reviewing DOD’s $174 million ScanEagle Unmanned Aerial System program and one evaluation report reviewing the status of SIGAR recommendations made to the
U.S. Agency for International Development (USAID) in the past five years. A list of completed and ongoing performance audits can be found in Appendix C of this quarterly report.

**Performance Audit 20-44-AR: Afghan National Army**

**DOD Did Not Conduct Required Oversight or Assess the Performance and Sustainability of the $174 million ScanEagle Unmanned Aerial System Program**

In a March 2015 DOD memorandum, the Combined Security Transition Command–Afghanistan (CSTC-A) helped identify an impending capability gap related to the Afghan National Army’s (ANA) ability to conduct intelligence, surveillance, and reconnaissance (ISR) operations that would result from a drawdown of Coalition forces. To increase the ANA’s ISR capabilities, DOD funded the purchase of 16,000 ISR assets, such as night vision devices and surveillance unmanned aerial vehicles, like the ScanEagle Unmanned Aerial System.

SIGAR found that Naval Air Systems Command (NAVAIR)—responsible for overseeing the ScanEagle contracts and ScanEagle manufacturer, Insitu—is unable to determine the extent to which Insitu met the terms of the contracts because NAVAIR did not meet U.S. government requirements for conducting contract oversight. First, NAVAIR did not designate a Contracting Officer’s Representative (COR) for all of the ScanEagle contracts, per DOD guidance. NAVAIR’s Contracting Officer did not perform COR duties for those contracts, as U.S. guidance suggests for firm-fixed-price contracts where a COR is not assigned. Second, NAVAIR did not have an in-country sponsor in Afghanistan responsible for validating contract requirements, as DOD required. Third, NAVAIR could not produce evidence that Insitu completed 122 of the total 403 deliverables required to determine if the contractor met the terms of the contracts. Insitu provided evidence that it completed four of the 122 deliverables that NAVAIR did not have.

DOD did not measure and evaluate ScanEagle program performance. SIGAR found that Naval Air Systems Command (NAVAIR)—responsible for overseeing the ScanEagle contracts and ScanEagle manufacturer, Insitu—is unable to determine the extent to which Insitu met the terms of the contracts because NAVAIR did not meet U.S. government requirements for conducting contract oversight. First, NAVAIR did not designate a Contracting Officer’s Representative (COR) for all of the ScanEagle contracts, per DOD guidance. NAVAIR’s Contracting Officer did not perform COR duties for those contracts, as U.S. guidance suggests for firm-fixed-price contracts where a COR is not assigned. Second, NAVAIR did not have an in-country sponsor in Afghanistan responsible for validating contract requirements, as DOD required. Third, NAVAIR could not produce evidence that Insitu completed 122 of the total 403 deliverables required to determine if the contractor met the terms of the contracts. Insitu provided evidence that it completed four of the 122 deliverables that NAVAIR did not have.

DOD did not measure and evaluate ScanEagle program performance. SIGAR found that Naval Air Systems Command (NAVAIR)—responsible for overseeing the ScanEagle contracts and ScanEagle manufacturer, Insitu—is unable to determine the extent to which Insitu met the terms of the contracts because NAVAIR did not meet U.S. government requirements for conducting contract oversight. First, NAVAIR did not designate a Contracting Officer’s Representative (COR) for all of the ScanEagle contracts, per DOD guidance. NAVAIR’s Contracting Officer did not perform COR duties for those contracts, as U.S. guidance suggests for firm-fixed-price contracts where a COR is not assigned. Second, NAVAIR did not have an in-country sponsor in Afghanistan responsible for validating contract requirements, as DOD required. Third, NAVAIR could not produce evidence that Insitu completed 122 of the total 403 deliverables required to determine if the contractor met the terms of the contracts. Insitu provided evidence that it completed four of the 122 deliverables that NAVAIR did not have.
previous assertions that it used the Compact to measure ScanEagle outcomes, CSTC-A told SIGAR in September 2019 that it no longer uses the Compact. Furthermore, SIGAR found that DOD did not assess the sustainability of the ScanEagle program, or the ANA’s ability to sustain the ISR capabilities it developed and acquired using the ScanEagle systems.

CSTC-A and NAVAIR have encountered delays and challenges in developing the ANA’s capability to independently operate and maintain the ScanEagle program due to (1) inadequate training of ANA soldiers, (2) insufficient manning of ANA ScanEagle operations, (3) insufficient fielding of operational ANA ScanEagle sites, and (4) the ANA’s inability to operationalize intelligence obtained through the program. As a result of these delays and challenges, DOD lacks information necessary to track, understand, and improve the return on its $174 million investment in the program, and is poorly positioned to transfer responsibilities to the ANA.

SIGAR made five recommendations in the report. To improve ScanEagle contract oversight, SIGAR recommends that the Secretary of Defense (1) direct NAVAIR personnel managing and overseeing the ScanEagle contracts to ensure the COR on the current contract is performing all required COR duties; and (2) direct NAVAIR, in coordination with appropriate coalition partners, to immediately designate an in-country sponsor and an in-country COR for the current ScanEagle contract. To better understand the performance of the ScanEagle program, and the Afghan government’s ability to sustain the program, SIGAR recommends that the Secretary of Defense (3) direct NAVAIR to immediately share existing Insitu performance reporting information and related contract deliverables with appropriate coalition partners responsible for the current ScanEagle contracts, and agree to a plan with CSTC-A for sharing future contract performance information. To ensure that U.S. investments in training ANA soldiers to perform the
ScanEagle mission are protected, SIGAR recommends that the Secretary of Defense (4) work with the ANA to develop requirements to help ensure that recently certified ANA soldiers will be placed in positions that take advantage of their newly acquired skills. To help ensure that U.S. procurements in ScanEagle equipment are protected and used as intended, SIGAR recommends that the Secretary of Defense (5) direct responsible DOD departments to work with the ANA to establish a system for tracking the location of ScanEagle equipment across Afghanistan.

**Evaluation 20-46-IP: USAID Recommendations Follow-Up**

**U.S. Agency for International Development Implemented More than 80 Percent of Recommendations from SIGAR Audits and Inspections**

This evaluation is a follow-up to SIGAR’s October 2014 report that examined the status of recommendations SIGAR made to USAID in performance audits, financial audits, inspections, evaluations, and alert letters issued between January 2008 and April 2014. This evaluation provides information on the status of SIGAR recommendations made to USAID over the past five years.

Over the five-year period since the 2014 report examining USAID’s implementation of SIGAR recommendations, SIGAR’s Audits and Inspections Directorate made 201 recommendations in 68 reports to USAID. Of the 201, USAID implemented 167 recommendations, 22 remained open, and only 12 were not implemented and closed. About 90% of the 201 recommendations were intended to enhance contract oversight or improve program effectiveness. The recommendations resulted in $66 million in funds put to better use and called for USAID to review and recoup, as appropriate, more than $87 million in questioned program costs. The implementation of SIGAR’s recommendations also helped USAID hold contractors accountable for completing required work and led to improved safety conditions for infrastructure projects.

Office of Management and Budget Circular A-50 requires executive agencies to maintain accurate records of the status of recommendations throughout the entire resolution process, and appoint a top-level audit follow-up official to oversee the implementation of recommendations. SIGAR found that USAID uses a system called the Consolidated Audit and Compliance System to track SIGAR recommendations through their resolution. In addition, USAID appointed a top-level audit follow-up official responsible for overseeing SIGAR recommendations. The Federal Acquisition Streamlining Act requires agencies to take corrective action on audit recommendations, and directs agencies to resolve the recommendations within 12 months after the issuance of a final report. SIGAR found that USAID took less than 12 months to resolve 147 of the 179 closed recommendations, and more than 12 months to implement the other 32 recommendations.
SIGAR also found that USAID guidance differs from the Federal Acquisition Streamlining Act in the length of time allowed for final actions to implement a recommendation. While the act requires that recommendation resolution take no more than 12 months total, USAID’s Automated Directives System (ADS) 595 allows up to six months for a management decision and an additional 12 months for final resolution, for a total of 18 months for a resolution.

SIGAR made one recommendation in the report. To comply with federal law and ensure that recommendations made to USAID are resolved within 12 months, SIGAR recommended that the USAID Administrator update ADS 595 to be in accordance with the 12-month recommendation resolution timeline required by the Federal Acquisition Streamlining Act of 1994.

Financial Audits
SIGAR launched its financial-audit program in 2012, after Congress and the oversight community expressed concerns about oversight gaps and the growing backlog of incurred-cost audits for contracts and grants awarded in support of overseas contingency operations. SIGAR competitively selects independent accounting firms to conduct the financial audits and ensures that the audit work is performed in accordance with U.S. government auditing standards. Financial audits are coordinated with the federal inspector-general community to maximize financial-audit coverage and avoid duplication of effort.

This quarter, SIGAR completed six financial audits of U.S.-funded projects to rebuild Afghanistan, in addition to 38 ongoing financial audits with over $851 million in auditable costs, as shown in Table 2.1. A list of completed and ongoing financial audits can be found in Appendix C of this quarterly report.

SIGAR issues each financial-audit report to the funding agency that made the award(s). The funding agency is responsible for making the final determination on questioned amounts identified in the report’s audit findings. Since the program’s inception, SIGAR’s financial audits have identified more than $440 million in questioned costs and $364,907 in unremitted interest on advanced federal funds or other revenue amounts payable to the government. As of June 30, 2020, funding agencies had disallowed more than $27.5 million in questioned amounts, which are thereby subject to collection. It takes time for funding agencies to carefully consider audit findings and recommendations. As a result, final disallowed-cost determinations remain to be made for several of SIGAR’s issued financial audits. SIGAR’s financial audits also have identified and reported 530 compliance findings and 571 internal-control findings to the auditees and funding agencies.

| TABLE 2.1 |
|---|---|
| **SIGAR’S FINANCIAL AUDIT COVERAGE ($ BILLIONS)** |   |
| 166 completed audits | $8.15 |
| 38 ongoing audits | 0.85 |
| **Total** | **$9.00** |

Note: Numbers have been rounded. Coverage includes auditable costs incurred by implementers through U.S.-funded Afghanistan reconstruction contracts, grants, and cooperative agreements.

Source: SIGAR Audits and Inspections Directorate.

**Questioned amounts:** the sum of potentially unallowable questioned costs and unremitted interest on advanced federal funds or other revenue amounts payable to the government.

**Questioned costs:** costs determined to be potentially unallowable. The two types of questioned costs are (1) ineligible costs (violation of a law, regulation, contract, grant, cooperative agreement, etc. or an unnecessary or unreasonable expenditure of funds); and (2) unsupported costs (those not supported by adequate documentation or proper approvals at the time of an audit).
Financial Audits Issued
The six financial audits completed in this quarter identified $9,141,944 in questioned costs as a result of internal-control deficiencies and noncompliance issues.

Financial Audit 20-39-FA: Department of State’s Antiterrorism Assistance Program in Afghanistan
Audit of Costs Incurred by Alutiiq LLC
State awarded task orders to Alutiiq Technical Services LLC and Alutiiq Professional Training LLC to support State’s Antiterrorism Assistance program and enhance the antiterrorism skills of foreign law enforcement and security officials. The companies are subsidiaries of Alutiiq LLC. The first task order’s period of performance was March 1, 2014, through February 28, 2015. After 10 modifications, State increased funding from $2.4 million to $14.6 million, and extended the end date to August 31, 2016. The second task order’s period of performance was September 1, 2016, through February 28, 2017. After four modifications, State increased its funding from $2.8 million to $5.7 million, and extended the end date to August 31, 2017.

SIGAR’s financial audit, performed by Williams, Adley & Company–DC LLP, reviewed a total of $19,539,320 in costs Alutiiq incurred for both task orders from March 1, 2014, through August 31, 2017. The auditors identified five deficiencies in Alutiiq’s internal controls and four instances of noncompliance with the terms of the task orders. Williams Adley identified $8,765,541 in questioned costs charged to the task orders related to these issues.

Audit of Costs Incurred by Janus Global Operations LLC
On March 3, 2012, the Department of State’s Bureau of Political-Military Affairs, Office of Weapons Removal and Abatement awarded a time and materials task order for $8,780,343 to Sterling Operations Inc. to support humanitarian mine action, conventional-weapons destruction, and technical assistance in Afghanistan. The objective was to remove mines and other unexploded ordnances and provide education about the risk the mines pose throughout the country. After 28 modifications, the task order’s total funding increased to $24,943,314, and the period of performance was extended from March 23, 2013, to September 23, 2017. In April 2016, Sterling changed its name to Janus Global Operations LLC.

SIGAR’s financial audit, performed by Crowe LLP, reviewed $7,679,200 in costs charged to the task order from March 24, 2015, through September 23, 2017. The auditors identified three deficiencies in Janus’ internal controls and three instances of noncompliance with the terms of the task order.
Crowe identified $208,748 in questioned costs charged to the task order related to these issues.

**Financial Audit 20-40-FA: USAID’s Afghanistan Health Sector Resiliency Project**

**Audit of Costs Incurred by Palladium International LLC**

On September 25, 2015, USAID awarded a cost-plus-fixed-fee contract for $37,936,471 to Futures Group International LLC to support the Afghanistan Health Sector Resiliency Project; a later modification to the contract reflected Futures Group International’s change of name to Palladium International LLC. The objective of the project was to help the Afghan government strengthen and reform the Afghan health system to become self-reliant. After 11 modifications, the contract’s total funding decreased to $27,634,654, and the end of the contract’s period of performance changed from September 30, 2019, to September 27, 2020.

SIGAR’s financial audit, performed by Davis Farr LLP, reviewed $8,987,950 in costs charged to the contract from January 1, 2018, through September 30, 2019. The auditors identified four significant deficiencies in Palladium’s internal controls and four instances of noncompliance with the terms of the contract. Davis Farr identified $119,937 in questioned costs charged to the contract related to these issues.

**Financial Audit 20-37-FA: Department of State’s Assistance to the Legal Education Support Program–Afghanistan II**

**Audit of Costs Incurred by the University of Washington**

On March 22, 2017, the Department of State’s Bureau of International Narcotics and Law Enforcement Affairs awarded a three-year, $7,000,000 grant to the University of Washington in support of its Legal Education
Support Program–Afghanistan II. The program’s objectives included building capacity in legal education at public universities throughout Afghanistan by providing opportunities for Afghan faculty members to improve academic methods, develop English language skills, and strengthen legal analysis, research, and writing. The grant was modified once, but the period of performance did not change and ended on March 31, 2020.

SIGAR’s financial audit, performed by Davis Farr LLP, reviewed $4,258,262 in costs charged to the grant from April 1, 2017, through June 30, 2019. The auditors identified four significant deficiencies in the University of Washington’s internal controls and four instances of noncompliance with the terms of the grant. Davis Farr identified $30,931 in questioned costs charged to the grant related to these issues.

Financial Audit 20-41-FA: USAID’s Afghanistan Development Assistance for Legal Access and Transparency Program
Audit of Costs Incurred by Checchi and Company Consulting Inc.
On April 18, 2016, USAID awarded a cost-plus-fixed-fee task order for $43,869,327 to Checchi and Company Consulting Inc. in support of USAID’s Afghanistan Development Assistance for Legal Access and Transparency program. The program’s objective was to improve citizens’ access to justice services based on Afghan law. After 11 modifications, the task order’s total funding increased to $68,163,468, and the period of performance was extended by one year to April 17, 2021.

SIGAR’s financial audit, performed by Davis Farr LLP, reviewed $16,350,571 in costs charged to the contract from October 1, 2017, through June 30, 2019. The auditors identified four significant deficiencies in Checchi’s internal controls and three instances of noncompliance with the terms of the task order. Davis Farr identified $16,787 in questioned costs charged to the task order related to these issues.

Financial Audit 20-42-FA: Department of the Army’s UH-60A Afghanistan Enhanced Phase Maintenance Inspection Program
Audit of Costs Incurred by Support Systems Associates Inc.
On April 12, 2018, Army Contracting Command (ACC)-Redstone awarded a cost-plus-fixed-fee delivery order to Support Systems Associates Inc. (SSAI) to recondition UH-60A helicopters for Afghan security forces under the Afghanistan Enhanced Phase Maintenance Inspection program. After eight modifications, ACC decreased funding from $7,192,780 to $5,321,151 with no change to the final delivery date of February 28, 2019.

SIGAR’s financial audit, performed by Crowe LLP, reviewed $5,176,486 in costs charged to the award from April 12, 2018, through February 28, 2019. The auditors found no significant deficiencies in SSAI’s internal controls or instances of noncompliance with the terms of the delivery order. Accordingly, Crowe identified no questioned costs.
INSPECTIONS

Inspection Reports Issued
SIGAR issued two inspection reports this quarter. A list of completed and ongoing inspections can be found in Appendix C of this quarterly report.

On July 3, 2014, the Taliban fired several rockets at the military section of North Kabul International Airport, hitting a storage hangar for the Afghan National Army (ANA) and Train Advise Assist Command-Air (TAAC-Air) Joint Air Force (JAF) I. The attack resulted in extensive damage to the hangar and an attached building. Repairing the hangar complex was on the Afghan Air Force’s top-10 priorities list because of its importance as an inspection and maintenance facility for ANA aircraft.

On September 20, 2016, the U.S. Army Corps of Engineers (USACE) Transatlantic Afghanistan Engineer District awarded a firm-fixed-price contract for approximately $2.5 million to Assist Consultants Inc. (ACI) to demolish the damaged hangar and build a new one at the same location. The contract also included renovating the attached building and supporting infrastructure. After eight modifications, the contract’s value increased to approximately $2.9 million, and the completion date was extended to June 30, 2019. On July 18, 2019, USACE transferred the complex to the Combined Security Transition Command-Afghanistan (CSTC-A), which requested and funded the project. CSTC-A then transferred it to the Afghan Ministry of Defense (MOD) on September 23, 2019.

SIGAR found that the ANA TAAC-Air JAF I hangar complex construction and renovation work generally met contract requirements and applicable standards. However, ACI finished the project 430 days (about 14 months) later than initially scheduled, and SIGAR noted six deficiencies resulting from ACI’s noncompliance with the contract that raise concerns about the quality of the work at the complex. Among the deficiencies SIGAR identified were non-functional exterior lights and several holes that needed to be patched in the exterior wall of a room on the lower floor. During site visits to the hangar complex, SIGAR observed that ANA staff and contractors were using the complex and it appeared to be clean and in good condition.

However, SIGAR has concerns regarding whether the complex is being operated and maintained to allow it to function as intended. CSTC-A told SIGAR that when it turned the complex over to the Ministry of Defense (MOD) on September 23, 2019, “the MOD was properly notified of their responsibility to properly maintain the facilities that have been officially transferred as well as how to request repairs for issues that are covered by the one-year warranty.” Consequently, since September 2019, when CSTC-A
transferred the project, the MOD should have been responsible for operation and maintenance (O&M), including routine activities necessary to maintain the complex and equipment.

In addition, the ANA did not have O&M manuals in Dari, the language most of the staff read, or fuel in or near the emergency generator used to operate the hangar doors during power outages. USACE still has the opportunity to hold ACI accountable for correcting the deficiencies because USACE is withholding almost $110,393 in payments to ACI, and the warranty expires on the building and hangar in May and June 2020, respectively.

SIGAR made four recommendations in the report. To ensure that the ANA TAAC-Air Joint Air Force Hangar I complex meets all contract requirements and construction standards, SIGAR recommended that the USACE Commanding General and Chief of Engineers: direct ACI to fix the six outstanding deficiencies it was notified to correct during the warranty periods but has not yet corrected; continue to withhold $110,393, consisting of a 10% retainage plus $92,979 still unbilled, until ACI corrects all identified deficiencies; and require ACI to give the ANA O&M manuals for the complex in Dari. To make sure the MOD and the ANA are performing O&M during the warranty period and the emergency generator can be used as intended, SIGAR recommended that the CSTC-A Commander reiterate to MOD and senior ANA officials and require them to acknowledge in writing (a) their responsibility for operating and maintaining the hangar complex during the warranty period, and (b) the importance of storing fuel in or near the emergency generator to operate the hangar doors quickly in case of emergency.

**Inspection Report 20-45-IP: Afghan Ministry of Interior Security Upgrades**

*Project Was Generally Completed According to Contract Requirements, but Construction and Maintenance Problems Exist*

On December 31, 2016, the U.S. Army Corps of Engineers (USACE) awarded Abdulhai Gardezi Construction Firm (ACF) a $2.4 million firm-fixed-price contract to complete security and access upgrades at the Ministry of Interior (MOI) headquarters complex in Kabul. USACE and ACF modified the contract seven times, ultimately increasing the award amount by about $21,500 and extending the completion date to January 21, 2019. USACE conducted a pre-final inspection on July 2, 2018, and determined that the work associated with the parking lot, surrounding concrete barriers, and the road and street lighting improvements were sufficiently complete to allow the Afghan government to start using them on July 10, 2018. The one-year warranty on these items started on July 10, 2018. USACE conducted a final inspection for the remaining contract items—52 Jersey barriers, the ECP building, and six drop-arm checkpoints and guard shacks—on March 5, 2019, and their one-year warranties started that day.
SIGAR inspectors visited the MOI headquarters complex six times in February and May 2020, and found that ACF generally constructed the security upgrades according to the contract requirements. For example, ACF constructed the new ECP building, drop-arm checkpoints, guard shacks, and parking lot as required. However, inspectors found three construction deficiencies that resulted from ACF not complying with contract requirements: a concrete barrier was at risk of falling over; a noncompliant ground cable was installed; and card readers were not installed at turnstiles in the ECP building’s entry and exit points.

SIGAR inspectors also found three potential safety hazards due to insufficient electrical power and inadequate maintenance. First, 85 of the 90 streetlights did not work because the MOI has not taken corrective actions recommended by ACF to make them operational. Second, the ECP building’s exit doors were missing panic bars, and some had unauthorized, noncompliant locks installed from the outside. Third, the MOI damaged the roof on a guard shack while relocating it and has not repaired the damage. In addition, inspectors found that the MOI was not using all of the upgrades. For example, the MOI was not using the ECP building for security screening.

SIGAR made two recommendations in the report. To protect U.S. taxpayers’ investment in the security upgrades at the MOI headquarters complex, SIGAR recommended that the CSTC-A Commander: (1) notify the MOI about the three construction deficiencies—the concrete barrier at risk of falling over, noncompliant ground cable, and uninstalled card readers—so the MOI is aware of them and can take whatever action it deems appropriate; and (2) notify the MOI of the three operational and maintenance problems—nonworking streetlights, missing panic bars and unauthorized exterior padlocks on ECP building exit doors, and damage to a guard shack.
shack roof—so the MOI can take whatever action it deems appropriate to correct them.

**Status of SIGAR Recommendations**

The Inspector General Act of 1978, as amended, requires SIGAR to report on the status of its recommendations. This quarter, SIGAR closed 19 recommendations contained in 11 performance-audit, inspection, and financial-audit reports.

From 2009 through March 2020, SIGAR issued 384 audits, alert letters, and inspection reports, and made 1,074 recommendations to recover funds, improve agency oversight, and increase program effectiveness.

SIGAR has closed 936 of these recommendations, about 87%. Closing a recommendation generally indicates SIGAR’s assessment that the audited agency either has implemented the recommendation or has otherwise appropriately addressed the issue. In some cases where the agency has failed to act, SIGAR will close the recommendation as “Not Implemented;” this quarter, SIGAR closed one recommendation in this manner. In some cases, these recommendations will be the subject of follow-up audit or inspection work.

SIGAR is also required to report on any significant recommendations from prior reports on which corrective action has not been completed. This quarter, SIGAR continued to monitor agency actions on 138 open recommendations. Eighty-one of these recommendations have been open for more than 12 months because the agency involved has not yet produced a corrective-action plan that SIGAR believes would resolve the identified problem, or has otherwise failed to appropriately respond to the recommendation(s).

For a complete list of open recommendations, see www.sigar.mil.

**SPECIAL PROJECTS**

SIGAR’s Office of Special Projects was created to quickly obtain and access information necessary to fulfill SIGAR’s oversight mandates; examine emerging issues; and deliver prompt, actionable reports to federal agencies and the Congress. Special Projects reports and letters focus on providing timely, credible, and useful information to Congress and the public on all facets of Afghanistan reconstruction. The directorate comprises a team of analysts supported by investigators, lawyers, subject-matter experts, and other specialists who can quickly and jointly apply their expertise to emerging problems and questions.

This quarter, SIGAR’s Office of Special Projects issued one review report. A list of completed Special Projects can be found in Appendix C of this quarterly report.
**Review 20-47-SP: Inconsistent Afghan Visa Policies Increased the Cost to Deploy Contractors to Afghanistan**

The Afghan president issued a presidential decree on December 31, 2014, providing guidance for implementing visa requirements. The decree specifies that all U.S. and NATO contractor employees may acquire a one-year multiple-entry visa and do not need a work permit. However, this procedure is being applied only to DOD contractors. U.S. Agency for International Development (USAID) contractors informed SIGAR that they have been unable to get a one-year multiple-entry visa and instead must obtain short-term visas and then obtain a work permit in Afghanistan before the Afghan government will issue them a one-year multiple-entry visa. SIGAR also found that the amount the Afghan government charges to renew visas varies among Afghan embassies abroad and the Ministry of Interior in Afghanistan.

SIGAR attempted to determine the amount contractors billed the U.S. government to acquire one-year, multiple-entry visas and visa renewals by reviewing 2018 invoices for 11 contracts (four DOD and seven USAID) issued to nine contractors that sent employees to Afghanistan in 2018. However, the invoices did not have enough detail to determine the amount the U.S. government was charged. Therefore, to estimate the amount it cost the U.S. government to reimburse contractor employees for acquiring visas, SIGAR issued a questionnaire and used the average prices provided by the responding contractors.

Data from the four DOD contractors that deployed 4,859 employees to Afghanistan in 2018 showed that the U.S. government reimbursed them an average of $692 per deployed employee; the five USAID contractors that deployed 298 employees to Afghanistan in 2018 reported that they were charged an average of $931 per deployed employee. In 2018, DOD and
USAID deployed 22,231 contractors to Afghanistan who needed Afghan visas. If the guidance from the presidential decree and the Afghan Embassy in Washington DC’s website had been followed, then the most these visas should have cost was $8 million total if all 22,231 employees were issued an initial one-year multiple-entry visa, at $360 each, according to Ministry of Foreign Affairs guidance. However, using the averages provided by the nine contractors, SIGAR estimates that visas and work permits could have cost the U.S. government more than $15.5 million in 2018. In other words, U.S. contractors were likely charged nearly double the legitimate cost for visas to work in Afghanistan.

SIGAR recommended the Department of State coordinate with the Afghan government to standardize visa policies so that all U.S.-funded contractors involved with reconstruction of Afghanistan are treated equally, as stipulated in the Presidential decree that states that all U.S. contractors can acquire a one-year multi-entry visa and are not required to obtain a work permit.

SIGAR provided a draft of this report to State, DOD, and USAID. USAID agreed with SIGAR’s findings, and expressed their appreciation for SIGAR highlighting the Afghan government’s inconsistent procedures for issuing initial one-year multiple entry visas and the subsequent one-year visa renewals. CSTC-A agreed that the elimination of inconsistency in both fees and duration of visas for contractors would be beneficial. State did not concur with our recommendation saying that adding such an initiative to their diplomatic agenda right now would detract from other high-priority objectives they are pursuing to reach a peace agreement. State added that they could give future consideration to explore with the Afghan government the possibility of applying visa terms similar to those that apply to DOD contractors to State and USAID contractors.

LESSONS LEARNED
SIGAR’s Lessons Learned Program was created to identify lessons and make recommendations to Congress and executive agencies on ways to improve current and future reconstruction efforts. To date, the program has issued seven reports. Four reports are currently in development on U.S. government support to elections, monitoring and evaluation of reconstruction contracting, efforts to advance and empower women and girls, and a report on police and corrections. Issued lessons-learned reports and their companion interactive versions are posted on SIGAR’s website, www.sigar.mil.
INVESTIGATIONS
During the reporting period, SIGAR’s criminal investigations resulted in three criminal charges and two guilty pleas. SIGAR initiated three new cases and closed eight, bringing the total number of ongoing investigations to 123.

To date, SIGAR investigations have resulted in a cumulative total of 151 criminal convictions. Criminal fines, restitutions, forfeitures, civil settlements, and U.S. government cost savings and recoveries total over $1.6 billion.

Former Employees of U.S. Government Contractor Plead Guilty to Conspiracy
During the reporting period, in the U.S. District Court, District of Columbia, two individuals pleaded guilty to one-count criminal informations charging conspiracy to commit offenses against the United States. The individuals were employed by a U.S. government contractor to recruit candidates for positions as language interpreters working with the U.S. military. They circumvented procedures designed to ensure candidates met minimum proficiency standards, which resulted in unqualified language interpreters being hired and later deployed alongside U.S. combat forces in Afghanistan. To carry out this scheme, they conspired with others to commit wire fraud and major fraud against the United States. Both obtained financial bonuses from their employer based on the number of candidates hired through their efforts.

Additionally, on March 12, 2020, in the U.S. District Court, District of Columbia, Kenneth O. Coates pleaded guilty to one count of major fraud against the United States, in connection to the conspiracy. To date, four co-conspirators have pleaded guilty as a result of the SIGAR-led investigation.

Suspensions and Debarments
This quarter, SIGAR’s suspension and debarment program referred six individuals and 12 companies for debarment based on evidence developed as part of investigations conducted by SIGAR in Afghanistan and the United States. These referrals bring the total number of individuals and companies referred by SIGAR since 2008 to 1006—encompassing 551 individuals and 455 companies to date.

As of June 30, 2020, SIGAR’s efforts to utilize suspension and debarment to address fraud, corruption and poor performance in Afghanistan have resulted in a total of 141 suspensions and 570 finalized debarments/special entity designations of individuals and companies engaged in U.S.-funded reconstruction projects. An additional 28 individuals and companies have entered into administrative compliance agreements with the U.S. government in lieu of exclusion from contracting since the initiation of the program. During the third quarter of 2020, SIGAR’s referrals resulted
SIGAR mourns the loss and honors the life of SIGAR Prosecutor (SIGPRO) and Associate General Counsel Daniel Butler, who passed away on May 14, 2020.

Dan began his career at the Department of Justice (DOJ) as an attorney in the Special Litigation Section of the Civil Rights Division (1981–84), transitioning to the Criminal Section of the Civil Rights Division (1984–89), the Public Integrity Section of the Criminal Division (1989–1999), the U.S. Attorney’s Office for the District of Columbia as an Assistant United States Attorney (1999–2012), and to the Fraud Section, where he had served since 2012 as a Trial Attorney detailed from SIGAR.

As a public servant, Dan’s investigations and prosecutions crossed many disciplines and subject matters, from civil rights cases, to fraud and bribery offenses, to prosecutions involving perjury and obstruction of the United States Congress. He prosecuted a number of important white-collar criminal cases on behalf of the United States.

Doost Case: Loans to a Marble Mine

At SIGAR, Dan was known as an exceptional prosecutor and an outstanding tactician, dedicated to ensuring justice was served. Among the many cases he prosecuted was the one in which Azam “Adam” Doost was indicted for fraud and convicted of 20 counts, including major fraud, wire fraud, false statements, and money laundering, after Doost fraudulently obtained a $15.8 million loan from the U.S. Overseas Private Investment Corporation to modernize a marble mine in Herat Province.

As the SIGPRO on the Doost investigation and the lead prosecutor at trial, Dan overcame several uncommon evidentiary issues: (1) despite the U.S. having no Mutual Legal Assistance Treaty with Afghanistan, Dan obtained certified Afghan bank records for use at trial—the first time in any SIGAR investigation that such were admitted as evidence in U.S. courts; and (2) Dan led a U.S. prosecution team to Italy to obtain video testimony from witnesses through an international treaty process involving perjury and obstruction of the United States Congress. Doost was sentenced to 54 months in prison followed by 36 months of supervised release, and was ordered to pay almost $9 million each in forfeiture and restitution.

For his work on the Doost case, Dan and his team received SIGAR’s Group On-The-Spot award in 2018 and Dan himself received three SIGAR Special Act Awards 2018, 2019, and 2020.

HA Yard Case: Bribes to U.S. Military Personnel

In another notable case, the Humanitarian Aid Yard (HA Yard) at Bagram Air Field was the focus of an International Contract Corruption Task Force investigation based on allegations that Afghan contractors were paying bribes to U.S. military personnel in return for preference in awarding government contracts. The HA Yard functioned as a storage/distribution facility for large quantities of clothing, food, school supplies, and other humanitarian aid items. The HA Yard used U.S. government funds to purchase supplies from local Afghan vendors that were then provided to displaced Afghans as part of the Commander’s Emergency Response Program.

As the SIGPRO, Dan was an integral part of the investigative team and often coordinated the efforts of numerous agents from multiple agencies in both Afghanistan and the United States. He monitored their progress, offered guidance when requested, and provided court orders to secure evidence. Dan led the prosecution efforts of eight subjects in jurisdictions throughout the country from New York to Florida to California and cities in between. In doing so, he dealt with eight different U.S. Attorney offices and separate defense counsel in each location. Dan conducted proffer sessions, attended many court hearings, and negotiated with defense attorneys. His efforts resulted in guilty pleas by eight subjects to various charges including bribery, conspiracy, and money laundering, as well as the forfeiture of approximately $500,000 in cash and goods. Dan and his team received the Group Special Act Award in 2015 for their work on the case and Dan received the Special Act Award in 2016 for his exceptional contributions and exemplary performance working on complex financial fraud matters relating to the case.

Morgan Case: Bribes in Return for Stolen Fuel

In 2012, a SIGAR investigation was initiated based on information that U.S. Army Specialist Sheldon Morgan, a fuel specialist deployed to Forward Operating Base (FOB) Fenty from 2010 to 2011, had received $10,000 in bribes from an Afghan contractor in return for stolen fuel. Morgan confessed to the scheme to SIGAR and FBI investigators in December 2015 in Fairbanks, Alaska.

Dan initiated prosecution of this case immediately upon Morgan’s confession and quickly obtained a guilty plea. In typically conscientious fashion, Dan took it upon himself to twice travel to Fairbanks to ensure this matter was properly adjudicated with minimal impact on the local U.S. Attorney’s office. While traveling to the plea hearing, weather threatened to delay him. Instead of asking for a continuance, he spent more than 20 hours in flight in order to be able to represent the United States, obtained a guilty plea, and departed Fairbanks in less than two days’ time. In July 2016, Morgan entered into a plea agreement in U.S. District Court, Fairbanks, to one count of conspiracy to
commit offenses against the United States, namely bribery, in violation of 18 U.S.C. § 201(b), and to defraud the United States of money and property, namely fuel, in violation of 18 U.S.C. § 371. Morgan was sentenced to four months’ incarceration.

**Casellas Case: Theft of Equipment and Fraudulent Payments**

In 2013–2014, International Contract Corruption Task Force (ICCTF) agents investigated Army Staff Sergeant Luis Casellas for the theft of computers, portable radios, tools, and other military equipment at FOB Wolverine in Afghanistan. They found that Casellas smuggled illegal proceeds from the sale of the stolen equipment back to the U.S. concealed in packages sent through the U.S. Postal Service and United Parcel Service. The investigation also uncovered false representations to the Army that led to the payment of over $97,000 in fraudulent Overseas Housing Allowance payments.

As the SIGPRO, Dan skillfully guided Afghanistan-based agents in obtaining search warrants on a military base, which led to evidence seizures at FOB Wolverine based on warrants issued by a Military Magistrate Judge. Dan then prosecuted the case in U.S. District Court, San Juan, Puerto Rico.

Over the course of many long trips to San Juan, Dan led a methodical presentation of evidence and witnesses to the grand jury, resulting in an indictment charging Casellas with theft of government property, bulk currency smuggling, smuggling, making a false statement, and wire fraud. Dan overcame all defense motions filed with the court leading to a guilty plea to the bulk-cash and theft-of-government-property charges. Casellas was subsequently sentenced to 21 months’ incarceration, three years of supervised release, 104 hours of community service, and a $400 special court assessment.

**Miller Case: Bribes from Road Construction Contractors**

Another case Dan spearheaded involved the investigation of Mark Miller, a U.S. Army Corps of Engineers contracting officer stationed at Camp Clark in Khost Province. Miller oversaw contract awards and approved contract changes that allowed companies to significantly increase the amount they were paid for a particular job. The ICCTF found that Miller received $300,000 in bribes by Afghan road construction contractors through intermediaries. Investigations in Afghanistan and the United States showed that Miller received numerous bribes and sent the money to multiple relatives for safekeeping until he returned home to Springfield, IL. Several subjects were identified who were located in Afghanistan, Australia, South Africa, and the United States, requiring investigation in all of those locations.

ICCTF agents relied heavily on Dan during the investigation because of his experience in dealing with foreign investigations in countries with and without cooperation treaties with the United States. Dan wrote assistance requests and worked with government agencies to get approvals for foreign witnesses to testify in U.S. courts. As a result of negotiations with defense counsel wherein Dan made an exhaustive presentation of the evidence, Miller pled guilty in U.S. District Court, Springfield, to taking bribes and was sentenced to over eight years in prison and debarred from federal contracts for 15 years.

**Professional Awards from SIGAR and CIGIE**

For his work on several other cases, Dan received SIGAR’s Special Act award in 2017, as well as three Team IG Awards for Excellence in 2017 and 2019. He was also part of a team of by 21 special agents, investigators, and attorneys who received a 2017 Council of the Inspectors General on Integrity and Efficiency (CIGIE) Award for Excellence–Investigation for the investigation of the theft of 700,000 gallons of fuel in Afghanistan, resulting in over $5 million of court-ordered restitution and civil monetary settlement.

**Devoted Husband and Father**

Dan was a devoted husband to his wife Kitty, and a loving father to sons Jeff and Sam. A consummate gentleman and friend, he was also an accomplished athlete. He represented the United States as a swimmer in the Paralympic Games in Barcelona (1992), Atlanta (1996), and Sydney (2000). He won three gold medals (including the gold medal in the 1996 Atlanta Games for the men’s 50-meter butterfly) and one bronze medal.
in five finalized debarments. Fourteen individuals and seven companies are currently in proposed debarment status, awaiting final adjudication of debarment referrals by agency suspension and debarment officials.

Suspensions and debarments are an important tool for ensuring that agencies award contracts only to responsible entities. SIGAR’s program addresses three challenges posed by U.S. policy and the contingency contracting environment in Afghanistan: the need to act quickly, the limited U.S. jurisdiction over Afghan nationals and Afghan companies, and the vetting challenges inherent in the use of multiple tiers of subcontractors. SIGAR continues to look for ways to enhance the government’s responses to these challenges through the innovative use of information resources and investigative assets in both Afghanistan and the United States.

SIGAR makes referrals for suspensions and debarments based on completed investigations that SIGAR conducts or participates in. In most cases, SIGAR’s referrals occur in the absence of acceptance of an allegation for criminal prosecution or remedial action by a contracting office and are therefore the primary remedy to address contractor misconduct.

In making referrals to agencies, SIGAR provides the basis for a suspension or debarment decision by the agency as well as all of the supporting documentation needed for an agency to defend that decision should it be challenged by the contractor at issue. Based on the evolving nature of the contracting environment in Afghanistan and the available evidence of contractor misconduct and/or poor performance, on occasion SIGAR has found it necessary to refer individuals or companies on multiple occasions for consideration by agency suspension and debarment officials.

OTHER SIGAR OVERSIGHT ACTIVITIES

Inspector General John Sopko Gives Virtual Remarks at Czech Republic National Security Conference
On June 25, 2020, Inspector General John Sopko gave virtual remarks entitled “Joint International Involvement in Afghanistan’s Reconstruction and its Relevance for the Future” at the Czech Republic National Security Conference. IG Sopko focused on international reconstruction efforts in Afghanistan and discussed the benefits to having strong international allies in the reconstruction effort to share knowledge and expertise. He emphasized that continued international support and oversight will lead to improved chances of success in Afghanistan.

Inspector General Sopko Gives Keynote for IWA-UNAMA Webinar
On June 24, 2020, Inspector General John Sopko gave the keynote speech for a public webinar hosted jointly by Integrity Watch Afghanistan and the UN Assistance Mission in Afghanistan. The title of the event was “The State
of Corruption in Afghanistan and the Role of Independent Institutions." IG Sopko spoke about the prevalence of corruption in Afghanistan, and its effects on the Afghan public, security, and international investment. Mr. Sopko also highlighted SIGAR's congressionally requested assessments of the Afghan government's anti-corruption strategy.

**Inspector General Sopko Delivers Annual Bruce J. Klatsky Endowed Lecture in Human Rights at Case Western Reserve Law School**

On June 23, 2020, Inspector General John Sopko gave a virtual speech to his alma mater, Case Western Reserve Law School in Cleveland, Ohio. IG Sopko graduated from Case Western Reserve Law School 43 years ago, and shared remarks titled, “Corruption: A Threat to the Rule of Law and Sustainable Peace in Afghanistan.” IG Sopko spoke about SIGAR and its oversight mission, and highlighted the greatest threat to the U.S. mission in Afghanistan: corruption.

IG Sopko described how systemic and criminal corruption impact the Afghan people, the judicial system, the economy, education, and healthcare. He also discussed SIGAR's work on its congressionally mandated assessments of the Afghan government's anticorruption strategy. IG Sopko explained that unless the issue of corruption is addressed, any peace will not be sustainable in Afghanistan.

**Inspector General Sopko Discusses Anti-Corruption Efforts in Afghanistan on the American Bar Association’s National Security Law Today Podcast**

On June 18 and June 25, 2020, the ABA National Security Law Today podcast aired “Inspectors General: Anti-Corruption in Afghanistan,” a two-part
series interviewing Inspector General John Sopko. IG Sopko discussed how endemic corruption in Afghanistan continues to undermine U.S. reconstruction efforts. The first episode explores SIGAR’s central role in fighting waste, fraud, and abuse, the weaknesses in the rule of law in Afghanistan, and the illicit narcotic economy and its effects on the overall Afghan economy. The second episode discusses findings from SIGAR’s 2019 High Risk List, specific cases of corruption in Afghanistan such as the prevalence of “ghost soldiers” and stolen fuel supplies, and SIGAR’s impact on legislation and reform. The series can be found on the ABA website: https://www.americanbar.org/groups/law_national_security/nslt/

Inspector General Sopko Gives Virtual Remarks at Diplomatic and Consular Officers, Retired (DACOR) Event
On May 15, 2020, Inspector General Sopko addressed the Diplomatic and Consular Officers, Retired (DACOR) in an event titled, “The Real Lessons from America’s 18-Year Reconstruction Effort in Afghanistan.” IG Sopko’s virtual remarks focused on the political, economic, security, and health crisis facing Afghanistan, their impact on the future of Afghanistan, and how SIGAR’s Lessons Learned Program has been at the forefront of examining these issues and identifying waste, fraud, and abuse of taxpayer funds for Afghan reconstruction.

IG Sopko explained the tenuous state of the Afghan security situation because of ongoing clashes with the Taliban and the Afghan security forces, and how that affects intra-Afghan negotiations and the U.S.-Taliban peace agreement. IG Sopko also provided an update on the COVID-19 pandemic in Afghanistan, and how it is straining the already-lagging Afghan economy and health infrastructure.

Inspector General Sopko Briefs Members of House Oversight and Reform Subcommittee on National Security
On April 29, 2020, Inspector General Sopko and SIGAR’s Director of Research and Analysis Deborah Scroggins remotely briefed Chairman Stephen Lynch (D-MA), Ranking Member Glenn Grothman (R-WI), and other members of the House Oversight and Reform Committee’s National Security Subcommittee. The briefing focused on SIGAR’s April 2020 Quarterly Report and covered a multitude of topics including the conditions of the U.S.-Taliban peace deal, COVID-19 case tracking among U.S. personnel in Afghanistan, and methods being used to track “ghost” soldiers and police officers on the Afghan Security Forces payroll. Ranking Member Grothman questioned IG Sopko about opium production and counternarcotics efforts in Afghanistan. Other topics included oversight access and the protection of women’s rights.
SIGAR OVERSIGHT ACTIVITIES

SIGAR BUDGET
SIGAR is funded through September 30, 2020, under the Further Consolidated Appropriations Act, 2020, H.R. 1865, which provides SIGAR full funding in the amount of $54.9 million. The budget supports SIGAR’s oversight activities and products by funding SIGAR’s Audits and Inspections, Investigations, Management and Support, and Research and Analysis Directorates, as well as its Office of Special Projects, and the Lessons Learned Program.

SIGAR STAFF
SIGAR’s staff count has remained steady since the last report to Congress, with 189 employees on board at the end of the quarter. Fifteen SIGAR employees are assigned at the U.S. Embassy Kabul, and one employee is assigned to Bagram Air Base in Bagram, Afghanistan. Because of the COVID-19 pandemic, 13 of SIGAR’s employees normally deployed to Afghanistan have left the country and returned to the United States on Authorized Departure. Return to Afghanistan of employees on Authorized Departure will occur when the Embassy in Kabul determines that conditions are safe for employees to return. Two SIGAR staff members have remained in Kabul this quarter during the pandemic.

SIGAR also employed seven Afghan nationals in its Kabul office to support the Forward Operations, Investigations, and Audits Directorates. Due to the COVID-19 pandemic and travel restrictions imposed by Departments of Defense and State, SIGAR was not able to supplement its resident staff this quarter with personnel on short-term temporary duty in Afghanistan.
“We need to see a comprehensive agreement which ends violence; safeguards the human rights of all Afghans, including women; upholds the rule of law; and eliminates terrorist safe havens once and for all.”

—NATO Secretary General Jens Stoltenberg