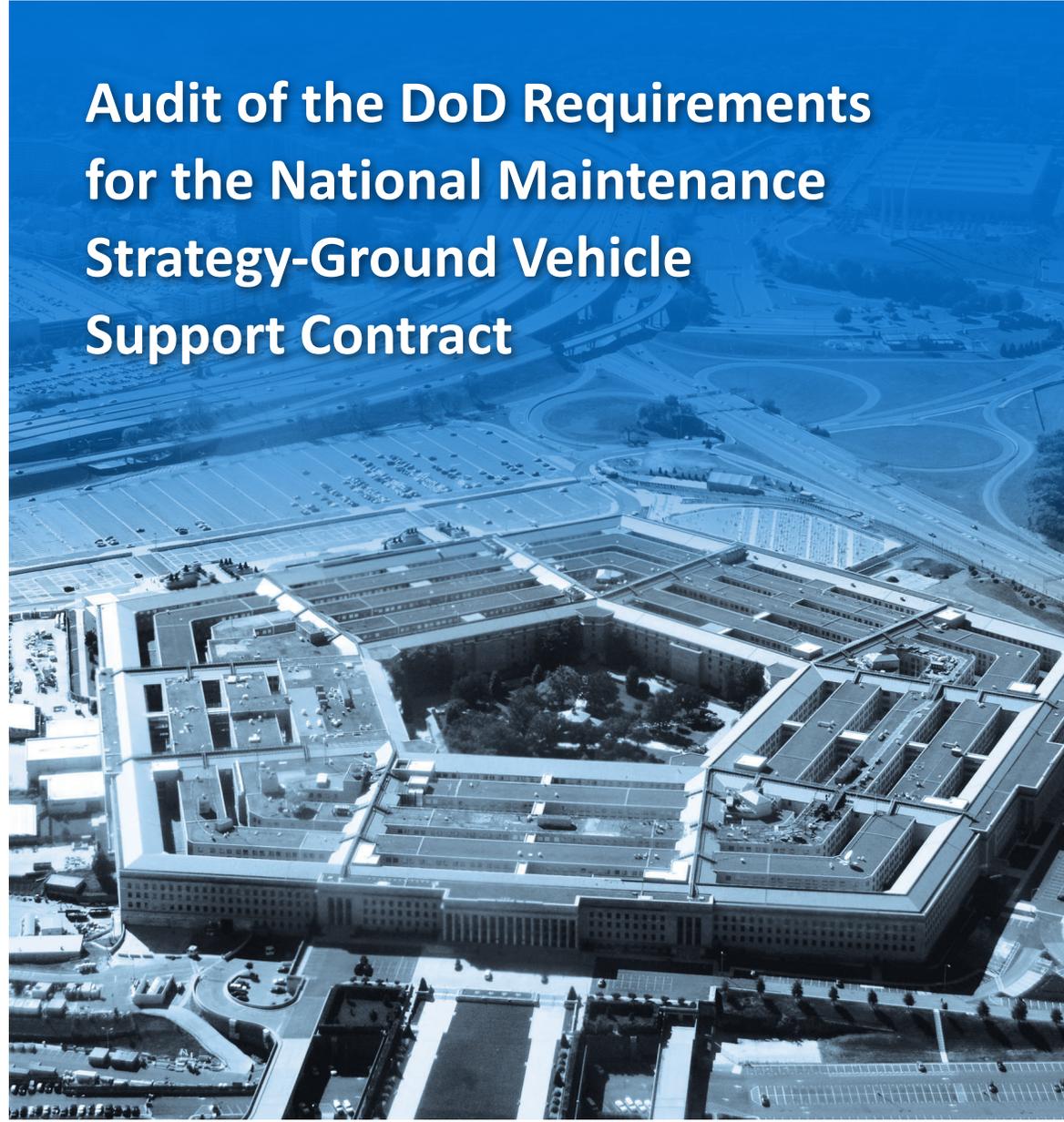




INSPECTOR GENERAL

U.S. Department of Defense

DECEMBER 13, 2019



Audit of the DoD Requirements for the National Maintenance Strategy-Ground Vehicle Support Contract

INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE





Results in Brief

Audit of the DoD Requirements for the National Maintenance Strategy-Ground Vehicle Support Contract

December 13, 2019

Objective

The objective of the audit was to determine whether the DoD developed training, mentoring, and contractor logistics support requirements for the National Maintenance Strategy-Ground Vehicle Support (NMS-GVS) contract that meets the Afghan National Defense and Security Forces (ANDSF) needs for maintaining and sustaining its vehicles.

Background

The NMS-GVS contract is a key aspect of the North Atlantic Treaty Organization Coalition's Resolute Support mission to train, advise, and assist the ANDSF to perform vehicle maintenance and help the ANDSF achieve self-sufficiency. The Combined Security Transition Command-Afghanistan (CSTC-A) developed the requirements for the NMS-GVS contract.

From December 2010 through May 2017, prior to the NMS-GVS contract, the Army procured vehicles, equipment maintenance, and training for the ANDSF using three consolidated Afghanistan-Technical Equipment Maintenance Program (A-TEMP) contracts. Although the A-TEMP contracts increased the ANDSF competency in performing vehicle and equipment maintenance, the ANDSF was not self-sufficient in maintaining its vehicles and equipment and relied heavily on contractor logistics support. In addition, the A-TEMP contracts lacked adequate contract oversight, accurate performance metrics, supervisory development, and ANDSF participation. CSTC-A captured identified deficiencies and combined all of the requirements into one contract based on the lessons learned from the A-TEMP contracts.

Visit us at www.dodig.mil

Background (cont'd)

On May 23, 2017, U.S. Army Contracting Command-Warren (ACC-Warren) awarded the NMS-GVS contract, valued at \$451.9 million, for the base and four option years ending on August 30, 2022. ACC-Warren exercised the NMS-GVS contract base year, which ended on August 30, 2018, and the option year one period of performance, which ended on August 30, 2019.

The NMS-GVS contractor provides logistics support to maintain various classes of military vehicle (such as Mine Resistant Ambush Protected, High Mobility Multipurpose Wheeled Vehicle, and other military vehicles) readiness. The ANDSF continues to train and develop the ability to independently conduct maintenance, quality control, and supply chain management.

To develop ANDSF self-sufficiency, the NMS-GVS contract requires the contractor to train the ANDSF to use specific software systems to track vehicle inventory, maintenance work orders, and vehicle supplies and parts. When CSTC-A officials established the NMS-GVS contract training and mentoring requirements, they gave the contractor flexibility in how it implemented and executed the training provided to the ANDSF. In addition, in the contract, CSTC-A officials established a work split requirement between the contractor and the ANDSF for completing maintenance work orders. For example, for the base year of the contract, CSTC-A established a 50-percent work split for vehicle maintenance and repairs between the contractor and the Afghan National Army. Additionally, CSTC-A established a 95-percent work split for the contractor and a 5-percent work split for the Afghan National Police.

Finding

CSTC-A developed requirements for the NMS-GVS contract that were not measurable and achievable. Specifically, CSTC-A did not:

- develop training and mentoring requirements that measured ANDSF trainees' progression towards advanced levels of maintenance because CSTC-A used



Results in Brief

Audit of the DoD Requirements for the National Maintenance Strategy-Ground Vehicle Support Contract

Finding (cont'd)

contractor-supported vehicle readiness rates to measure the training and mentoring success of the ANDSF rather than ANDSF's work performance;

- develop achievable work split requirements for the ANDSF because CSTC-A established aggressive work splits for the NMS-GVS contract despite the ANDSF's poor performance history and the ANDSF was not prepared to perform its assigned share of the work split; or
- provide the required Core software systems needed for the ANDSF to achieve vehicle accountability and maintain maintenance data when the NMS-GVS contract was awarded because CSTC-A relied on a separate contractor to develop the Core software systems.

As a result, CSTC-A developed requirements to maintain vehicles and train the ANDSF, and the Army awarded contract support valued at \$2.2 billion since 2010 with no significant progress in the ANDSF's ability to independently perform maintenance. The \$2.2 billion in contractor support since 2010 includes the combined contract value of \$1.2 billion from the three A-TEMP contracts and contract value as of September 2019 of \$1 billion from the NMS-GVS contract. Based on the results of the NMS-GVS contract's base year and first 4 months of option year one, the ANDSF will face challenges in becoming self-sufficient unless CSTC-A develops training and mentoring requirements that measure the ANDSF progression levels, establishes a reasonable work split requirement, and provides required software systems. Furthermore, if the ANDSF does not become self-sufficient by August 2022 due to a lack of training success, the DoD may have to continue to pay contractor support to train and perform vehicle maintenance and repairs for the ANDSF after the contract ends.

Recommendations

We recommend that the CSTC-A Commander:

- develop training and mentoring requirements that track and measure ANDSF capabilities throughout the training program;
- document and report the ANDSF's progression towards the three levels of maintenance and separately record the vehicle maintenance and repairs completed by the ANDSF and the contractor;
- semiannually review the training and mentoring metrics for the contract requirements and document the results and modify the NMS-GVS contract training and mentoring requirements if necessary;
- semiannually review and document the ANDSF's ability to meet the agreed-upon work split, then modify the contract requirement based on the work split review results;
- coordinate with the Afghanistan Ministry of Defense and Ministry of Interior to develop agreements (bilateral commitment letters or others) to reinforce ANDSF's trainees attendance for the NMS-GVS training program; and
- develop and implement policies and procedures for planning and executing future service acquisitions to ensure that before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.

Management Comments and Our Response

The Deputy Commanding General agreed with the recommendation to develop training and mentoring requirements, document and report the ANDSF's progression and record vehicle maintenance, and semiannually review the training and mentoring metrics for the contract requirements. CSTC-A stated that these



Results in Brief

Audit of the DoD Requirements for the National Maintenance Strategy-Ground Vehicle Support Contract

Management Comments (cont'd)

recommendations have been in place since the award of the contract. However, comments from the Deputy Commanding General did not address the specifics of the recommendation, and we disagree that actions to address these three recommendations have been in place since the inception of the contract. The Trained Personnel Summary report only demonstrates trainee attendance and the number of trainees that graduated by location. It does not show the individual ANDSF trainee progression from performing routine maintenance to major vehicle repair and maintenance. We request that CSTC-A provide documentation that requirements have been developed in the contract that shows trainee progression through the three levels of vehicle repair and maintenance. Additionally, the Maintenance Reports do not show metrics of the ANDSF progression towards each of the three levels of maintenance. We also request that CSTC-A provide an analysis that shows the metrics of overall ANDSF progression towards higher levels of maintenance. Finally, the ongoing semiannual review is directed to contractor performance, rather than ANDSF progression. We request that CSTC-A include in the ongoing semiannual reviews an assessment of the training and mentoring metrics and provide documentation showing the results of the review and provide documentation of contract modification, if necessary.

The Deputy Commanding General agreed with the recommendation to semiannually review and document the ANDSF's ability to meet the agreed-upon work split, stating that the semiannual review and documentation of the work split already occurs during the review process. Comments from the Deputy Commanding General addressed the specifics of the recommendation; therefore, the recommendation is resolved and closed.

The Deputy Commanding General disagreed with the recommendation to honor the bilateral commitment letters and stated that the bilateral commitment letters do not specifically require the Afghanistan Ministry of Defense and Ministry of Interior to recruit, retain,

and maintain trainees for the NMS-GVS training program. Furthermore, the Office of Secretary Defense (Policy) Director of the Resource Policy and Requirements for Afghanistan stated on behalf of CSTC-A that the language in the bilateral commitment letters refers to U.S. sponsored training that occurs outside of Afghanistan and not for the NMS-GVS program. Based on management comments, we revised the recommendation to clarify the actions needed to reinforce ANDSF trainee attendance throughout the duration of the NMS-GVS training program. Comments from the Deputy Commanding General did not address the specifics of the revised recommendation; therefore, the recommendation is unresolved. We request that the Deputy Commanding General provide comments on the final report that addresses how CSTC-A will reinforce ANDSF trainee attendance. We request CSTC-A provide comments to the final report on the revised recommendation by January 13, 2020.

The Deputy Commanding General agreed with the recommendation to develop and implement policies and procedures for planning and executing future service acquisitions, stating that CSTC-A has multiple process policies to synchronize necessary external resources to ensure the NMS-GVS contractor will have all the resources necessary to meet the requirements of the contract. Comments from the Deputy Commanding General addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation once we receive and review the newly implemented policies.

Please see the Recommendations Table on the next page for the status of recommendations.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Commander of Combined Security Transition Command-Afghanistan	1.a, 1.b, 1.c, 1.e	1.f	1.d

Please provide Management Comments by January 13, 2020.

Note: The following categories are used to describe agency management’s comments to individual recommendations.

- **Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – OIG verified that the agreed upon corrective actions were implemented.



**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

December 13, 2019

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION
AND SUSTAINMENT
COMMANDER, U.S. CENTRAL COMMAND
COMMANDER, U.S. FORCES-AFGHANISTAN
COMMANDER, COMBINED SECURITY TRANSITION
COMMAND-AFGHANISTAN
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: Audit of the DoD Requirements for the National Maintenance Strategy-Ground
Vehicle Support Contract (Report No. DODIG-2020-026)

This final report provides the results of the DoD Office of Inspector General's audit. We previously provided copies of the draft report and requested written comments on the recommendations. We considered management's comments on the draft report when preparing the final report. These comments are included in the report.

This report contains recommendations that are considered unresolved because Combined Security Transition Command-Afghanistan did not agree or did not fully address the recommendations presented in the report.

Therefore, as discussed in the Recommendations, Management Comments, and Our Response section of this report, of the six recommendations, four are unresolved, one is resolved, and one closed. We will track these recommendations until an agreement is reached on the actions to be taken to address the recommendations, and adequate documentation has been submitted showing that the agreed-upon action has been completed. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Therefore, please provide us within 30 days your response concerning specific actions in process or alternative corrective actions proposed on the recommendations. Your response should be sent to followup@dodig.mil if unclassified.

We appreciate the cooperation and assistance received during the audit. If you have any questions, please contact me at [REDACTED].

A handwritten signature in black ink, reading "Richard B. Vasquez".

Richard B. Vasquez
Assistant Inspector General for Audit
Readiness and Global Operations



Contents

Introduction

Objective	1
Background	1
National Maintenance Strategy–Ground Vehicle Support Contract Roles and Responsibilities	7
Review of Internal Controls	10

Finding. CSTC-A Did Not Develop Measureable and Achievable NMS-GVS Requirements	11
CSTC-A Developed Requirements That Were Not Measurable and Achievable	12
NMS-GVS Contract Requirements Does Not Support ANDSF Self-Sufficiency	20
Recommendations, Management Comments, and Our Response	21

Appendix

Scope and Methodology	28
Use of Computer-Processed Data	30
Prior Coverage	30

Management Comments

Combined Security Transition Command-Afghanistan	33
--	----

Acronyms and Abbreviations	44
---	----

Introduction

Objective

The objective of this audit was to determine whether the DoD developed training, mentoring, and contractor logistics support requirements for the National Maintenance Strategy-Ground Vehicle Support (NMS-GVS) contract that meets the Afghan National Defense and Security Forces (ANDSF) needs for maintaining and sustaining its vehicles.¹ See the Appendix for our scope and methodology and prior coverage.

Background

The NMS-GVS contract is one of the key lines of effort of the North Atlantic Treaty Organization (NATO) Coalition Resolute Support mission, which includes a partnership with Train, Advise, Assist Command advisors whose goal is to help the ANDSF achieve self-sufficiency as Coalition forces prepare to leave Afghanistan.² Combined Security Transition Command-Afghanistan (CSTC-A) and Army officials developed the NMS-GVS contract requirements to address prior contract deficiencies related to vehicle maintenance and training, and to reduce the risk of ANDSF operational failure when Coalition forces leave Afghanistan.³

Afghanistan-Technical Equipment Maintenance Program Contracts

From December 2010 through May 2017, prior to the NMS-GVS contract, the Army procured vehicles and equipment maintenance, and training for the ANDSF using three consolidated Afghanistan-Technical Equipment Maintenance Program (A-TEMP) contracts. According to the NMS-GVS acquisition strategy, the A-TEMP contracts increased the ANDSF competency in performing vehicle and equipment maintenance. However, the ANDSF was not self-sufficient in maintaining its vehicles and equipment and relied heavily on contractor logistics support.

According to the NMS-GVS acquisition plan, the A-TEMP contracts lacked Government oversight during the performance phase, which allowed for numerous

¹ The ANDSF is composed of the Afghan National Army under the Ministry of Defense and the Afghan National Police under the Ministry of Interior.

² According to NATO, the Resolute Support mission is to train, advise, and assist the ANDSF. Also according to NATO, Resolute Support will provide training, advice, and assistance in eight key areas: (1) resource management; (2) transparency, accountability, and oversight; (3) rule of law and governance; (4) force development; (5) operational sustainment and logistics; (6) command and control operations; (7) intelligence; and (8) strategic communications. For this report, ANDSF self-sufficiency refers to the ability of the ANDSF to independently perform vehicle maintenance, quality control, and supply chain management.

³ We use "Army officials" throughout this report to refer to the U.S. Army Contracting Command-Warren and U.S. Army Product Manager Allied Tactical Vehicles.

instances of contractor non-compliance. In addition, the NMS-GVS acquisition strategy identified lessons learned from the A-TEMP contracts, including issues such as lack of adequate contract oversight, insufficient performance metrics, lack of ANDSF experience managing its own maintenance, and low ANDSF participation. Additionally, the contract performance metrics did not accurately assess the contractor's performance, vehicle readiness, or ANDSF progress toward meeting self-sufficiency goals. Furthermore, the A-TEMP contracts focused on training at the maintainer level only and did not address the need for development at the management level to supervise supply chain and repair facilities. Finally, these contracts focused on maintaining ANDSF vehicles primarily through contractor support, rather than requiring the ANDSF to learn vehicle maintenance functions, which is vital to the goal of making the ANDSF self-sufficient.

CSTC-A developed the contract requirements to train and mentor the ANDSF in maintenance, sustainment, and supply chain management. CSTC-A, in coordination with U.S. Army Product Manager Allied Tactical Vehicles (PdM ATV) and U.S. Army Contracting Command–Warren (ACC-Warren), executed the NMS-GVS contract to train the ANDSF at both maintainer and management level. Furthermore, CSTC-A included requirements in the NMS-GVS contract for the contractor to develop a training program for the ANDSF to staff and manage vehicle and equipment maintenance positions and achieve higher vehicle readiness rates.

Additionally, CSTC-A developed the contract requirements to provide contractor logistics support. The contract requirement for contractor logistics support provides maintenance and supply chain management capability to supplement vehicle readiness while the ANDSF develops a self-sufficient maintenance and sustainment capability. The contractor logistics support requirement establishes a work split between the contractor and the ANDSF for completion of maintenance work orders. According to the NMS-GVS acquisition strategy, CSTC-A combined all of the requirements into one contract based on the lessons learned from the A-TEMP contracts.

National Maintenance Strategy–Ground Vehicles Support Contract

On May 23, 2017, ACC-Warren awarded the NMS-GVS contract to provide training and mentoring in maintenance, supply chain management, and contractor logistics support to the ANDSF.⁴ At contract award, the NMS-GVS contract was valued at \$451.9 million for the base year and four option years. The base year period of performance was May 2017 to August 2018. The contract type for the training and mentoring and contractor logistics support contract line item numbers is

⁴ Contract number W56HZV-17-C-0117.

cost-plus-incentive-fee.⁵ During the base year and execution of option year one, ACC-Warren issued four modifications, increasing the contract by \$274.1 million to \$726 million.⁶

Training and mentoring is intended to strengthen the ANDSF independent capability for maintenance, sustainment, quality control processes, and supply chain management of ground vehicles. The NMS-GVS contract requires the contractor to develop and provide a training and mentoring program that improves the skills of ANDSF personnel in vehicle maintenance and repairs. The NMS-GVS contractor's training plan outlines the level of skill progression for the ANDSF as Level 1-organizational maintenance, Level 2-regional maintenance, and Level 3-national maintenance.⁷ Progression of ANDSF personnel through the three levels of maintenance skills should demonstrate the individual's ability to conduct the required maintenance actions at each level. According to the NMS-GVS contract, the contractor must train ANDSF personnel responsible for maintaining and sustaining vehicles how to use the following information management systems (collectively referred to in this report as Core software systems).

- **Core Military Maintenance Management:** The ANDSF manual maintenance and electronic system that tracks vehicle and ground equipment maintenance work orders and vehicle readiness.⁸
- **Core Inventory Management System:** The ANDSF manual supply and web-based inventory management system used for the requisitioning, tracking, storing, and warehousing of repair parts.
- **Core Asset Management System:** The ANDSF manual equipment and property accountability system that tracks ANDSF property over multiple classes of supply and gives the ANDSF greater accountability and oversight of its equipment.

⁵ A cost-plus-incentive fee contract is a cost-reimbursement contract in which the Government pays the contractor for incurred costs plus an adjustable performance incentive fee based on cost and performance.

⁶ ACC-Warren issued eight modifications for the NMS-GVS contract, as of December 2018, four modifications increased the cost and the other four modifications were administrative changes to the NMS-GVS contract.

⁷ Level 1 organizational maintenance consists of the ability to conduct preventative maintenance check and services, minor repairs, and limited replacement of Class IX parts requiring no more than 24 hours of service. Level 2 regional maintenance consists of the ability to conduct minor body damage repairs and maintenance repairs that require fewer than 36 hours of service. Level 3 national maintenance consists of the ability to conduct major body damage repairs and more complex maintenance repairs that require more than 36 hours of service.

⁸ Contract modification 7, dated August 23, 2018, changed the name of Core Vehicle Management System to Core Military Maintenance Management.

Contract Requirements for Training and Mentoring

The contractor is responsible for developing and providing training and mentoring on maintenance management, vehicle maintenance, supply chain management, maintenance supply support, warehouse management, and warehouse supply support at the management and maintainer level. Figure 1 shows the contractor training members of the ANDSF.



Training and mentoring for the vehicle maintenance requirements of the NMS-GVS contract includes classroom instruction and on-the-job training. Maintenance management includes planning, organizing, and performing vehicle and ground equipment maintenance, such as oil changes or parts replacements. The contractor is also responsible for providing mobile maintenance training and making scheduled and unscheduled repairs at specified sites within each Afghanistan region. In addition, the NMS-GVS contract training and mentoring requirements provide the contractor flexibility in how it implements and executes the training provided to the ANDSF.⁹

Supply chain management training and mentoring includes classroom instruction and on-the-job training. According to the NMS-GVS contract requirements, supply chain management training and mentoring must include recording vehicle and ground equipment information for accountability, maintenance support, and vehicle readiness into the Core software systems.

⁹ For this report, contractor flexibility refers to a performance-based NMS-GVS contract, which allows the contractor to determine how to implement and execute its training plan.

Warehouse supply training and mentoring includes classroom instruction and on-the-job training. This training includes inventory management for repair parts and distribution at the national and regional levels, property accountability, and the establishment and oversight of warehouse management using the ANDSF supply system. Figure 2 shows members of the ANDSF participating in on-the-job training.

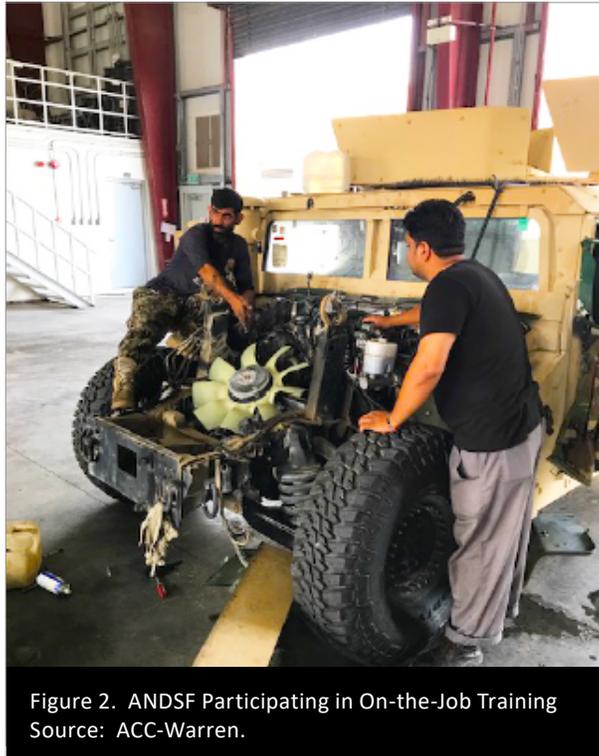


Figure 2. ANDSF Participating in On-the-Job Training
Source: ACC-Warren.

Contract Requirements for Contractor Logistics Support

Under the NMS-GVS contract, contractor logistics support includes vehicle maintenance, quality control, and supply chain management. Contractor logistics support also ensures vehicle readiness while the ANDSF attends training and develops the ability to conduct maintenance, quality control, and supply chain management. To develop ANDSF self-sufficiency, the NMS-GVS contract includes a work split between the contractor and the ANDSF for completion of maintenance work orders. Specifically, for the base year of the NMS-GVS contract, CSTC-A established a 50-percent work split between the contractor and the Afghan National Army and a 5-percent work split for the Afghan National Police and 95-percent for the contractor. The NMS-GVS contract is between the U.S. Government and the contractor with the goal that the ANDSF will complete its share of the work split.

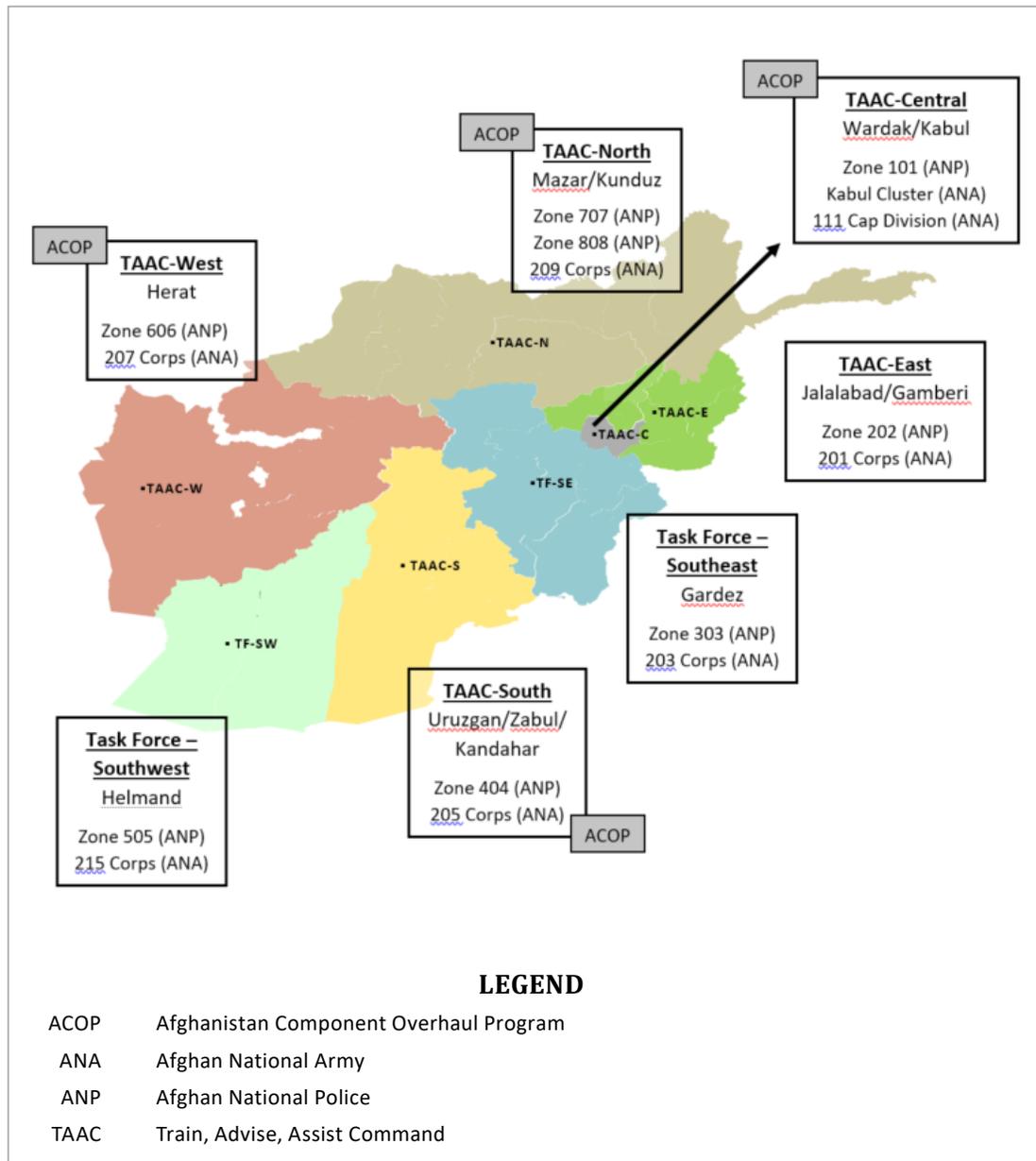
The NMS-GVS contract established standards and acceptable quality levels for work orders, with the contractor's percentage of the work split decreasing and the ANDSF's percentage of the work split increasing each contract year. The contractor is responsible for performing maintenance on the ANDSF vehicle fleets of 80,000 wheeled vehicles and ground equipment.¹⁰ The contractor conducts joint inspections with the ANDSF to determine whether the ANDSF has the capability to perform the repairs or whether the contractor will perform the repairs.

According to the NMS-GVS contract, during joint inspections, the contractor enters vehicles and ground equipment data into the ANDSF manual and Core software systems to maintain accountability and monitor progress of vehicles. The contractor performs regional and national maintenance at equipment maintenance sites and at the central maintenance facility. Maintenance includes scheduled, unscheduled, and deferred maintenance. Additionally, contractor logistics support includes contractor teams of maintenance technicians that travel to ANDSF locations within a region and perform unscheduled maintenance and repairs. The contractor mobile maintenance technicians carry tools, consumables, and repair parts to perform the vehicle repairs.

In addition, the contractor is required to conduct technical inspections and provide overhaul and repair support for repairable items as part of the Afghanistan Component Overhaul Program. Figure 3 illustrates Afghan National Army and Afghan National Police maintenance sites and Afghanistan Component Overhaul Program locations.

¹⁰ Vehicle types that the contractor is required to perform maintenance on include the Mobile Strike Force Vehicle, Mine Resistant Ambush Protected, Mine Resistant Ambush Protected Recovery Vehicle, High Mobility Multipurpose Wheeled Vehicle M1151 and M1152, Fuel Tanker, Medium Tactical Vehicle, Mine Rollers, Wrecker, Remaining Wheeled Vehicles, and Remaining Ground Equipment.

Figure 3. Afghan National Army and Afghan National Police Maintenance Sites



Source: PdM ATV.

National Maintenance Strategy—Ground Vehicle Support Contract Roles and Responsibilities

The Afghanistan Resources Oversight Council, CSTC-A, PdM ATV, and ACC-Warren coordinate to execute the NMS-GVS contract. Each command has a specific responsibility, but they share oversight of the NMS-GVS contract. In addition, U.S. Army Contracting Command-New Jersey (ACC-New Jersey) is solely responsible for the award and administration of the Core software enhancements contract. The NMS-GVS contract requires the contractor to use the Core software systems

and to train ANDSF personnel responsible for maintaining and sustaining vehicles how to use the Core software systems.

Afghanistan Resources Oversight Council

The Afghanistan Resources Oversight Council, within the Office of the Secretary of Defense, provides executive oversight for the Afghanistan Security Forces Fund. The council is co-chaired by the Under Secretary of Defense (Comptroller)/Chief Financial Officer, DoD; the Under Secretary of Defense for Acquisition and Sustainment; and the Under Secretary of Defense for Policy. Senior representatives for the council include personnel from the Joint Staff, U.S. Central Command, and the Office of the Assistant Secretary of the Army (Financial Management and Comptroller). The Afghanistan Resources Oversight Council ensures that the DoD provides the appropriate executive oversight of DoD funds appropriated for training, equipping, and sustaining the security forces and infrastructure in Afghanistan. The council reviews the resourcing policies and practices of the Afghanistan Security Forces Fund and oversees its financial, contracting, and business management processes.

Combined Security Transition Command–Afghanistan

CSTC-A is the requiring activity for the NMS-GVS contract requirements. According to Army Regulation 70-13, the requiring activity is responsible for translating the contract needs into an actionable requirement with measurable outcomes throughout contract performance.¹¹ CSTC-A's mission is to train, advise, and assist within Afghan security institutions to develop resource management capability and provide resources in accordance with the ANDSF requirements. CSTC-A focuses on helping Afghanistan make the ANDSF sustainable, effective, and affordable. CSTC-A is responsible for several essential functions and key capabilities, including establishing and implementing ministerial-level maintenance and establishing and implementing effective repair part management.

U.S. Army Product Manager Allied Tactical Vehicles

PdM ATV is part of the U.S. Army Program Executive Office Combat Support and Combat Service Support. PdM ATV relies on CSTC-A to work with the ANDSF to participate in vehicle maintenance, training, and completing work orders as stated in the NMS-GVS contract. In 2011, PdM ATV began providing life-cycle management of the ANDSF fleet of allied tactical vehicles.¹² PdM ATV supports the ANDSF capability and capacity to be self-sufficient and independently conduct

¹¹ Army Regulation 70-13, "Research, Development, and Acquisition: Management and Oversight of Service Acquisitions," Chapter 2, "Roles and Responsibilities," Subpart 2-2, "Requiring Activities," 2-2(a), "Identify and define the requirement."

¹² Allied tactical vehicles include Mobile Strike Force Vehicles, Light Tactical Vehicles, Medium Tactical Vehicles, Sports Utility Vehicles, and buses for the ANDSF.

security operation missions. PdM ATV works with CSTC-A and ACC-Warren to develop contract requirements, award and execute the NMS-GVS contract, and provide contracting officer's representatives to oversee the NMS-GVS contract.

PdM ATV contracting officer's representatives assist in monitoring the NMS-GVS contract performance. PdM ATV assigned six full-time U.S. Government contracting officer's representatives throughout Afghanistan to provide contract oversight. The contracting officer's representatives evaluate contractor performance in accordance with the quality assurance surveillance plan for the NMS-GVS contract. Oversight includes onsite inspection of parts, training, and maintenance facilities.

U.S. Army Contracting Command–Warren

ACC-Warren is responsible for acquisition support and contracting for the U.S. Army's major weapon systems, systems and equipment supporting other services, and foreign military sales customers. ACC-Warren ensures warfighting readiness for the soldier by purchasing ground combat, tactical vehicles, small arms, supporting services, and associated consumable parts.

The ACC-Warren contracting officer provides acquisition services for the NMS-GVS contract. According to the Federal Acquisition Regulation, the contracting officer has authority to enter into, administer, or terminate contracts, make related determinations and findings, and ensure performance of all necessary actions for effective contracting.¹³ Contracting officers may obligate the U.S. Government only to the extent of the authority delegated to them. The contracting officer for the NMS-GVS contract helps develop, solicit, award, and create modifications to change contract requirements. The contracting officer also delegates surveillance for the NMS-GVS contract to the administrative contracting officer representative and contracting officer's representative.

U.S. Army Contracting Command–New Jersey

ACC-New Jersey is responsible for delivering contracting solutions that support the Army and warfighter readiness. The ACC-New Jersey contracting officer awarded the Core software enhancement contract for the Core Military Maintenance Management System and the Asset Management System.¹⁴ The ACC-New Jersey contracting officer also administers this Core software enhancement contract.

¹³ Federal Acquisition Regulation Part 1, "Federal Acquisition Regulations System," Subpart 1.6, "Career Development, Contracting Authority, and Responsibilities," Subsections 1.602-1, "Authority," and 1.602-2, "Responsibilities."

¹⁴ On December 18, 2017, ACC-New Jersey awarded contract number W15QKN-18-C-0022 for Core software enhancements.

Review of Internal Controls

DoD Instruction 5010.40 requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls.¹⁵

We identified internal control weaknesses in the NMS-GVS contract requirements generation process. Specifically, CSTC-A did not develop measurable training and mentoring requirements, achievable work splits, and Core software systems to measure the ability of the ANDSF to become self-sufficient. We will provide a copy of the report to the senior official responsible for internal controls at CSTC-A.

¹⁵ DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

Finding

CSTC-A Did Not Develop Measureable and Achievable NMS-GVS Requirements

CSTC-A developed requirements for the NMS-GVS contract that were not measurable and achievable. Specifically, CSTC-A did not:

- develop training and mentoring requirements that measured ANDSF trainees' progression towards advanced levels of maintenance because CSTC-A used contractor-supported vehicle readiness rates to measure the training and mentoring success of the ANDSF rather than ANDSF's work performance;
- develop an achievable work split requirement for the ANDSF because CSTC-A established aggressive work splits for the NMS-GVS contract despite the ANDSF's poor performance history and the ANDSF was not prepared to perform its assigned share of the work split; or
- provide the required Core software systems needed for the ANDSF to achieve vehicle accountability and maintain maintenance data when the NMS-GVS contract was awarded because CSTC-A relied on a separate contractor to develop the Core software systems.¹⁶

As a result, CSTC-A developed requirements to maintain vehicles and train the ANDSF, and the Army awarded contract support valued at \$2.2 billion since 2010 with no significant progress in the ANDSF's ability to independently perform maintenance.¹⁷ Based on the results of the base year and first 4 months of option year one, the ANDSF will face challenges in becoming self-sufficient unless CSTC-A develops training and mentoring requirements that measure the ANDSF progression levels, establishes a reasonable work split requirement, and provides required software systems. Furthermore, if the ANDSF does not become self-sufficient by August 2022 due to lack of training success, the DoD may have to continue to pay contractor support to train and perform vehicle maintenance and repairs for the ANDSF after the contract ends.¹⁸

¹⁶ The most advanced level of maintenance for the ANDSF is Level 3 national maintenance. Level 3 national maintenance consists of the ability to conduct major body damage repairs and more complex maintenance repairs that requires more than 36 hours of service.

¹⁷ The \$2.2 billion in contractor support since 2010 includes the combined contract value of \$1.2 billion from the three A-TEMP contracts and contract value of September 2019 of \$1 billion from the NMS-GVS contract.

¹⁸ For this report, ANDSF self-sufficiency refers to the ability of the ANDSF to independently perform vehicle maintenance, quality control, and supply chain management.

CSTC-A Developed Requirements That Were Not Measurable and Achievable

CSTC-A developed requirements for the NMS-GVS contract to provide contractor logistics support while the ANDSF builds an independent vehicle maintenance capability and to train and mentor the ANDSF in maintenance, sustainment, and supply chain management. However, CSTC-A did not develop measurable and achievable requirements to meet ANDSF needs to be able to develop an independent vehicle maintenance capability.

CSTC-A Did Not Develop Training and Mentoring Requirements to Measure Trainees' Progression

CSTC-A did not develop training and mentoring requirements that measured ANDSF trainees' progression towards advanced levels of maintenance. According to the NMS-GVS contract, the ANDSF uses a three-level maintenance system consisting of Level 1-organizational, Level 2-regional, and Level 3-national maintenance. Additionally, according to Army Regulation 70-13, the requiring activity is responsible for identifying and defining requirements to ensure that it translates the contract needs into an actionable requirement for contract award that can be managed with measurable outcomes throughout contract performance. However, CSTC-A did not define training and mentoring requirements, such as documenting the level of maintenance the ANDSF trainees were able to conduct and did not establish a timeframe in which the ANDSF trainees should reach each level of maintenance. This occurred because CSTC-A used contractor-supported vehicle readiness rates to measure the training and mentoring success of the ANDSF rather than the ANDSF's work performance.

NMS-GVS Contract Did Not Include a Requirement to Document ANDSF Trainees' Progress

CSTC-A did not develop training and mentoring requirements that measured ANDSF trainees' progression towards advanced levels of maintenance. The NMS-GVS contract requirement states that the contractor will provide training and mentoring that includes maintenance management, maintenance, supply chain management, maintenance supply support, warehouse management, and warehouse supply support for management and maintainer positions. Additionally, the NMS-GVS contract requires the contractor to track trainee attendance and the training conducted. However, CSTC-A did not establish a timeframe in which the ANDSF trainees should reach each level of maintenance. Furthermore, CSTC-A did not document the level of maintenance the ANDSF trainees were able to perform, which is needed to measure the ANDSF's success in conducting vehicle maintenance

at all three levels of maintenance. Therefore, CSTC-A does not know if the ANDSF trainees can independently perform vehicle repairs during and at the end of the training program.

CSTC-A Used Contractor Vehicle Readiness Rates to Measure ANDSF Training and Mentoring Success

CSTC-A did not develop training and mentoring requirements that measured the ANDSF trainees' progression toward advanced levels of maintenance because CSTC-A used contractor-supported vehicle readiness rates to measure the training and mentoring success of the ANDSF, rather than the ANDSF work performance. Vehicle readiness rates are an inadequate measure of training and mentoring success because they only show how well the NMS-GVS contractor kept the vehicles in operational status. In addition, vehicle readiness rates are based on the assumption that all vehicles are accounted for and that each vehicle reported is mission capable. Furthermore, vehicle readiness rates do not measure the different levels of maintenance that the trainees can perform. For instance, CSTC-A does not know whether ANDSF trainees can replace windshield wipers or perform engine work. Therefore, the CSTC-A Commander should develop training and mentoring requirements that track and measure ANDSF capabilities throughout the training program. In addition, the CSTC-A Commander should document and report the ANDSF's progression towards the three levels of maintenance and separately record the vehicle maintenance and repairs completed by the ANDSF and the contractor. Furthermore, the CSTC-A Commander should semi-annually review the training and mentoring metrics for the contract requirements and document the results. If necessary, CSTC-A should modify the NMS-GVS contract training and mentoring requirements based on the semi-annual review results of the ANDSF's progression towards the levels of maintenance.

CSTC-A Did Not Develop Achievable Work Split Requirements

CSTC-A did not develop achievable work split requirements for the ANDSF. According to the Federal Acquisition Regulation, requirements for service contracts must be clearly defined and have appropriate performance standards developed to ensure that performance complies with contract terms.¹⁹ In addition, Army Regulation 70-13 states that the requiring activity is responsible for translating the contract needs into an actionable requirement for contract award that can be well-managed.²⁰ CSTC-A developed work split requirements for the contractor with the goal that the ANDSF would perform its share of the work split

¹⁹ Federal Acquisition Regulation Part 37, "Service Contracting," Subpart 37.5, "Management Oversight of Service Contracts," Section 37.503, "Agency-head responsibilities."

²⁰ Army Regulation 70-13, "Research, Development, and Acquisition – Management and Oversight of Service Acquisitions."

percentages. However, CSTC-A established aggressive work splits for the NMS-GVS contract despite the ANDSF's poor performance history and the ANDSF was not prepared to perform its assigned share of the work split.

ANDSF Did Not Meet Work Split Requirements Developed By CSTC-A

CSTC-A did not develop achievable work split requirements for the ANDSF. For the NMS-GVS contract, CSTC-A established an aggressive work split requirement between the contractor and the ANDSF without assessing whether the ANDSF could meet the requirement. According to the NMS-GVS acquisition plan, CSTC-A acknowledged that the goal of the ANDSF being self-sufficient by the end of the NMS-GVS contract in August 2022 was high risk and that the aggressive work split depended entirely on the ANDSF retaining and implementing the training provided by the NMS-GVS contractor. Because of the aggressive work split requirements established by CSTC-A, ANDSF personnel did not meet the work split requirements for the base year period, and the NMS-GVS contractor completed more of the work than outlined in the contract.

The NMS-GVS contract work split for the base year period requires the contractor to complete 50 percent of the work split, with the goal that the Afghan National Army complete the remaining 50 percent. However, during the contract base year from January through August 2018, the Afghan National Army completed 11 percent of the work split rather than the 50 percent work split established in the contract. The contractor completed 89 percent of the vehicle maintenance. In addition, the contract requires the contractor to complete 95 percent of the work split, with the goal that the Afghan National Police only complete the remaining 5 percent. However, during the base year, the Afghan National Police completed less than 1 percent of the work split rather than the 5 percent work split established in the contract.

In April 2018, after realizing that the ANDSF was not meeting the work split outlined in the NMS-GVS contract, CSTC-A completed a capabilities assessment that determined whether the ANDSF was on track to meet the work split in the base year contract and was ready to transition to option year one. According to the capabilities assessment, CSTC-A concluded that the ANDSF was not meeting the established work split, was not ready to transition to the agreed-upon work split for option year one, and needed more time to learn and retain the training and improve in completing vehicle maintenance and repairs.

On June 5, 2018, CSTC-A requested that ACC-Warren modify the NMS-GVS contract to adjust the work split for option years one through four. In accordance with the Justification Review document for the NMS-GVS contract, this change would allow the Afghan National Army and the Afghan National Police additional time to develop a self-sufficient maintenance capability while maintaining adequate vehicle

readiness rates. On August 30, 2018, the contracting officer issued an NMS-GVS contract modification that increased the work split percentages for the contractor and decreased the work split percentages for the ANDSF. Table 1 shows the original and modified work split requirement for the NMS-GVS contract.

Table 1. Original and Modified NMS-GVS Work Split Requirements

Contractor and ANDSF Components	Base Year	Option Year 1	Option Year 2	Option Year 3	Option Year 4
Contractor/ANA Original Work Split	50/50	30/70	20/80	10/90	0/100
Contractor/ANA Modified Work Split	N/A	45/55	30/70	20/80	10/90
Contractor/ANP Original Work Split	95/5	75/25	55/45	35/65	15/85
Contractor/ANP Modified Work Split	N/A	90/10	75/25	55/45	35/65

Legend

ANA Afghan National Army
 ANP Afghan National Police
 N/A Not Applicable

Source: The DoD OIG.

According to CSTC-A, as of December 31, 2018, the Afghan National Army and the Afghan National Police were not meeting the revised work split requirements. The Afghan National Army performed only 24 percent of the work split, which is 31 percent below the revised requirement, and the Afghan National Police fell short of the 10 percent requirement, performing only 7 percent of the work split.

CSTC-A Established Aggressive Work Split Requirements

CSTC-A did not develop achievable work split requirements for the ANDSF because CSTC-A established aggressive work splits for the NMS-GVS contract despite the ANDSF's poor performance history and the ANDSF was not prepared to perform its assigned share of the work split. According to personnel from the Office of the Under Secretary of Defense for Acquisition and Sustainment, the work split requirements were based on the assumption that the ANDSF could perform on a higher level than the current level of work instead of an analysis of the level of work performed by the ANDSF throughout the A-TEMP contracts periods. The A-TEMP contracts period of performance was from December 2010 through May 2017. In addition, CSTC-A and Army officials were unable to provide documentation to support how the original work split percentages were developed.

Furthermore, the NMS-GVS acquisition strategy identified that the ANDSF had prior difficulty completing its expected share of the work split because the ANDSF trainees did not consistently participate in maintenance training. CSTC-A identified during the transition from the A-TEMP contracts to the NMS-GVS contract that the lack of ANDSF participation in the maintenance training affected the ANDSF's ability to meet the maintenance schedules, which required the contractor to constantly train new personnel. In addition, the NMS-GVS acquisition plan also identified historical problems with the ANDSF's lack of participation in maintenance training, which hindered their ability to become self-sufficient. CSTC-A and Army officials acknowledged during interviews that the inability to retain ANDSF trainees and their unwillingness to perform maintenance are some of the major challenges the ANDSF faced in completing its share of the work split requirement.

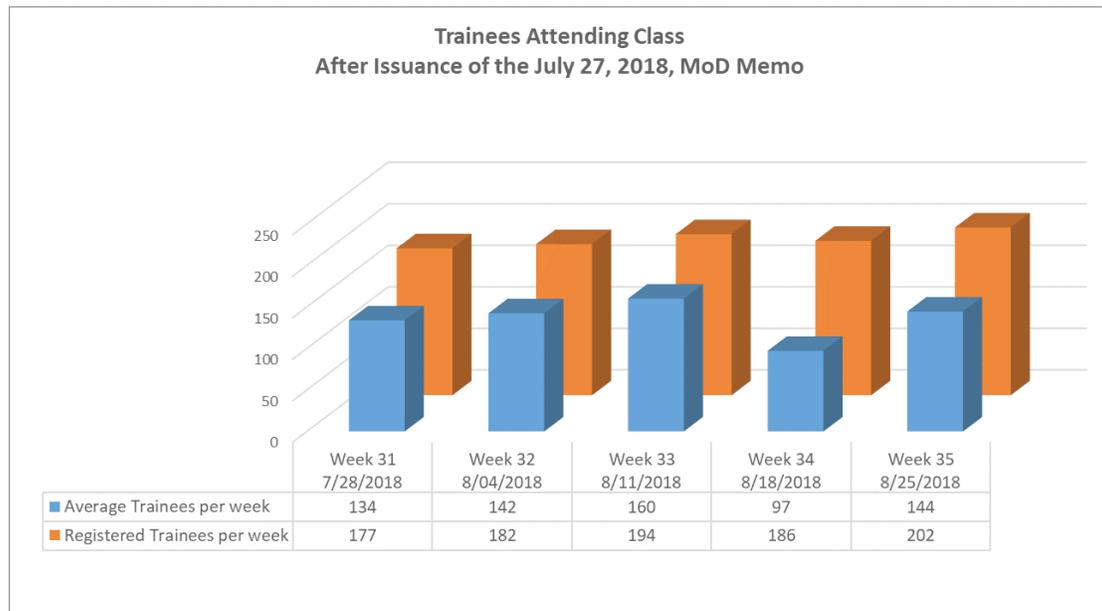
In addition, the capabilities assessment that CSTC-A completed in April 2018 identified that the ANDSF participation in the maintenance training for the base year for both the Afghan National Army and Afghan National Police was below 60 percent. In some cases, ANDSF supervisors randomly reassigned trainees to perform non-maintenance duties—for example, working as drivers and cooks—instead of performing vehicle maintenance. As a result of the reassignments, contractors were performing more of the work split.

The U.S. Government and the Afghan Ministry of Defense and Ministry of Interior signed bilateral commitment letters on May 24, 2018, and July 9, 2018, respectively, to address the lack of ANDSF training participation. Based on our review of the language within the commitment letters, we originally determined that CSTC-A was authorized to administer monetary penalties to the Government of the Islamic Republic of Afghanistan for noncompliance with the commitment letters in order to reinforce ANDSF trainee attendance throughout the duration of the U.S. Government-funded training. We also determined that CSTC-A had not administered any monetary penalties to the Afghan Ministry of Defense and Ministry of Interior for noncompliance of the bilateral commitment letter to recruit, retain, and maintain trainees for U.S. Government-funded training for the NMS-GVS training program. Based on the language of the commitment letters, we also originally determined that the CSTC-A Commanding General may reduce the budget allocation to the Afghan Ministry of Defense and Ministry of Interior by the agreed amount, plus the cost of schooling, travel, per diem, and any other associated cost per person, for each trainee that does not attend a U.S.-sponsored training, education, or seminar event. However, an Office of the Secretary of Defense (Resource Policy and Requirement for Afghanistan) official, speaking on behalf of CSTC-A, stated that the commitment letters and penalties were intended only to apply to U.S.-funded training events that require trainees to leave Afghanistan.

Therefore, the commitment letters are not applicable for the NMS-GVS training program. Also, CSTC-A indicated that these commitment letters described the efforts to ensure that the ANDSF fleets were maintained at optimum levels.

At the request of CSTC-A, on July 27, 2018, the Afghan Ministry of Defense issued a memorandum that directed all Afghan National Army commanders and technical officers to provide an adequate number of trainees for NMS-GVS training classes. The memorandum also stated that all Afghan National Army commanders and technical officers must cease using Afghan National Army specially trained mechanics and technical officers in non-maintenance duties. As of August 31, 2018, the ANDSF trainee participation rate did not increase despite the Ministry of Defense memorandum. According to an ACC-Warren Contracting Officer Representative, some trainees continued performing non-maintenance duties. Due to the reassignments, ANDSF trainees still were not consistently attending training, and the low participation rate continued. Figure 4 illustrates the comparison between the number of Afghan National Army trainees attending class and the number registered for class after the issuance of the July 27, 2018, memorandum.

Figure 4. Comparison of Afghan National Army Trainees Attending Class and Trainees Registered for Class



Source: ACC-Warren.

In addition, a Government Accountability Office (GAO) report identified that low literacy rates, poor training attendance, and low retention were challenges for ANDSF when performing maintenance and sustainment.²¹ Although CSTC-A, Army officials, and the GAO report identified lessons learned from the A-TEMP

²¹ GAO report GAO-19-116 “Afghanistan Security – Some Improvements Reported in Afghan Forces’ Capabilities, but Actions Needed to Enhance DoD Oversight of U.S.-Purchased Equipment,” October 2018.

contracts regarding the ability of the ANDSF to retain training and perform vehicle maintenance, CSTC-A did not consider the issues identified, and instead, developed an aggressive work split requirement for the ANDSF. Additionally, CSTC-A has not administered any penalties to address the poor attendance and low retention. CSTC-A indicated that their current approach of not administering penalties to the Ministry of Defense and Ministry of Interior has incentivized them to recruit, retain, and maintain trainees for the NMS-GVS contract. Although we acknowledge that the intent of the commitment letters do not apply to the training and mentoring requirements from the NMS-GVS contract, as indicated above, actions taken by CSTC-A have not resulted in improved ANDSF participation. In addition, the ANDSF trainee participation rate had not increased, requiring CSTC-A to implement new provisions to reinforce ANDSF trainees attendance throughout the duration of the NMS-GVS training program. Therefore, the CSTC-A Commander should semi-annually review and document the ANDSF's ability to meet the agreed-upon work split, then modify the contract requirements based on the work split review results. In addition, the CSTC-A Commander should coordinate with the Afghanistan Ministry of Defense and Ministry of Interior to develop agreements (bilateral commitment letters or others) to reinforce ANDSF's trainee attendance for the NMS-GVS training program and enforce the agreements as necessary.

Required NMS-GVS Contract Systems Were Not Available

CSTC-A did not provide the required Core software systems needed for the ANDSF to achieve vehicle accountability and maintain maintenance data when the NMS-GVS contract was awarded. The NMS-GVS contract requires the contractor to train ANDSF maintenance management personnel to use the Core software systems. However, CSTC-A could not provide two of three Core software systems to the NMS-GVS contractor when the contract was awarded because CSTC-A relied on a separate contractor to develop the Core software systems.

Core Software Systems Requirement

CSTC-A did not provide the required Core software systems needed for the ANDSF to achieve vehicle accountability and maintain maintenance data when the NMS-GVS contract was awarded. On May 23, 2017, ACC-Warren awarded the NMS-GVS contract with a requirement for the contractor to use and train the ANDSF on the Core software systems. According to ACC-Warren contract personnel, the intent was for the NMS-GVS contractor and the ANDSF to have immediate use of all Core software systems. However, CSTC-A relied on the use of the Core software systems knowing that two of the three systems that make up the Core software systems, the Core Military Maintenance Management (Core M3) and Asset Management Systems (Core AMS), were not available for immediate use.

The Core software systems is a web-based tool that is intended to be used to account for repair parts and vehicles and to record the status of maintenance actions. Since the Core M3 and Core AMS systems were not available, it reduced CSTC-A's ability to collect ANDSF vehicle maintenance data, and maintain visibility and accountability of the reported ANDSF vehicles. Due to the unavailability of the Core M3 and Core AMS, the NMS-GVS contractor could not train the ANDSF on these two Core software systems and CSTC-A lacked full oversight and accountability of ANDSF vehicles.

Furthermore, the NMS-GVS contractor is using an alternate software for the base and option year one. Although the alternate software used under the NMS-GVS contract provides visibility for contractor maintenance actions, it does not provide complete information of the ANDSF vehicle readiness and property accountability.

Core Software Systems Unavailable at NMS-GVS Contract Award

CSTC-A did not provide the required Core software systems needed for the ANDSF to achieve vehicle accountability and maintain maintenance data when the NMS-GVS contract was awarded because CSTC-A relied on a separate contractor to develop the Core software systems. Specifically, CSTC-A developed requirements on the NMS-GVS contract that relied on the use of the Core software systems knowing that two of the three systems, Core M3 and Core AMS, were not available for immediate use for the NMS-GVS contract. Due to the unavailability of the Core M3 and Core AMS systems at NMS-GVS contract award, CSTC-A requested that ACC-New Jersey develop the two systems to address the ANDSF needs. ACC-New Jersey awarded the Core software system contract on December 18, 2017.²² However, according to the schedule for implementing the Core software enhancements contract, the Core M3 and Core AMS systems will not be available to the ANDSF until November 2019. To address the unavailability of the Core M3 and Core AMS systems, CSTC-A, in coordination with Army officials, issued a NMS-GVS contract modification on August 23, 2018, for the contractor to use an alternate software. The alternate software was intended to be a temporary solution so the NMS-GVS contractor could document completed vehicle and ground equipment maintenance.

In addition, because the Core M3 and Core AMS systems were not ready for use by the ANDSF, the ACC-New Jersey contracting officer withheld the Core software enhancements contractor's final payment of \$118,000 pending final acceptance by CSTC-A for the Core software enhancements contract. However, future contracts should ensure that all specific resources included in the contract requirements,

²² We use "Core software system contract" throughout this report when referring to the Core software enhancements contract issued by ACC-New Jersey.

such as systems, are available at contract award. Therefore, to ensure that the DoD does not pay for contract requirements that cannot be executed, the CSTC-A Commander should develop and implement policies and procedures for planning and executing future service acquisitions to ensure that before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.

NMS-GVS Contract Requirements Does Not Support ANDSF Self-Sufficiency

CSTC-A developed requirements to maintain vehicles and train the ANDSF, and the Army awarded contract support valued at \$2.2 billion since 2010 with no significant progress in ANDSF's ability to independently perform maintenance. Based on the results of the base year and first 4 months of option year one, the ANDSF will face challenges in becoming self-sufficient unless CSTC-A develops training and mentoring requirements that measure the ANDSF progression levels, establishes a reasonable work split requirement, and provides required software systems. CSTC-A did not put in place measures that would determine if the training and mentoring program was successful. As a result, the DoD does not have assurance that ANDSF personnel will be self-sufficient and fully trained to independently perform the required vehicle maintenance by the end of the contract. Furthermore, if the ANDSF does not become self-sufficient in vehicle maintenance by August 2022 due to lack of training success, the DoD may have to continue to pay for contractor support to train and perform vehicle maintenance and repairs for the ANDSF after the contract ends.

Finally, without the required Core software systems, CSTC-A decision makers and the ANDSF cannot track vehicle readiness and maintenance work orders for vehicles and ground equipment as stated in the NMS-GVS contract. As of December 2018, CSTC-A's poorly developed requirements resulted in an increase of the NMS-GVS total contract value. CSTC-A made assumptions that the contractor logistics support would decline based on the NMS-GVS contract work split requirements. However, poorly developed requirements resulted in four modifications, increasing the contract by \$274.1 million during the base year. Furthermore, if CSTC-A continues to develop requirements that are not clearly defined and achievable, it could result in future contract increases. Finally, CSTC-A decision makers and the ANDSF cannot determine whether the ANDSF is on track to become self-sufficient in vehicle maintenance by August 30, 2022, which is part of the objective of the Resolute Support mission.

Recommendations, Management Comments, and Our Response

Revised and Deleted Recommendations

As a result of management comments, we revised draft Recommendation 1.e to clarify the actions needed to reinforce ANDSF trainee attendance throughout the duration of the U.S. sponsored training. Because of the revisions on draft Recommendation 1.e and management comments, we deleted draft Recommendation 1.f. In addition, we renumbered draft Recommendation 1.g as Recommendation 1.f.

Recommendation 1

We recommend that the Commander of Combined Security Transition Command-Afghanistan:

- a. Develop training and mentoring requirements that track and measure Afghan National Defense and Security Forces' capabilities throughout the training program.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, agreed with the recommendation, stating that any effort to improve ANDSF maintenance operations must include programmatic training and mentoring requirements that improve the ANDSF organic maintenance capabilities over time. The Deputy Commanding General also stated that training and mentoring requirements to track and measure ANDSF capabilities have been in place since award of the contract. The Deputy Commanding General also stated that the NMS-GVS contractor is contractually obligated to provide training and mentoring in the areas of maintenance management, maintenance, supply chain management, maintenance supply support, warehouse management, and warehouse supply support at both the maintenance and management level. In addition, the Deputy Commanding General stated that the NMS-GVS contractor closely tracks the contractual training and mentoring requirements. In the Trained Personnel Summary report, CSTC-A uses the total number of students graduating as an indicator to measure the ANDSF's capabilities and progression towards major vehicle repair and maintenance. The NMS-GVS contractor further tracks and reports on specific training classes, which range from basic mechanic to maintenance management.

Our Response

Comments from the Deputy Commanding General did not address the specifics of the recommendation; therefore, the recommendation is unresolved. We acknowledge that since contract award, the contractor has established a training plan and training and mentoring requirements that include classroom and on-the-job training. Additionally, CSTC-A uses the total number of students graduating from the Trained Personnel Summary report to measure the ANDSF capabilities and progression. However, after reviewing the Trained Personnel Summary report, we determined that the report only demonstrates trainee attendance and the number of trainees that graduated by location and does not show the individual ANDSF trainee progression from performing routine maintenance to major vehicle repair and maintenance. We request that the Deputy Commanding General, responding on behalf of CSTC-A, reconsider his position on the recommendation and provide comments on the final report that defines training and mentoring requirements in the NMS-GVS contract that establish metrics to show individual ANDSF trainees can independently perform vehicle repair and maintenance during and at the end of the training program.

- b. Document and report the Afghan National Defense and Security Forces' progression towards the three levels of maintenance and separately record the vehicle maintenance and repairs completed by the Afghan National Defense and Security Forces and the contractor.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, agreed with the recommendation, stating that any effort to improve ANDSF maintenance operations must include accurate record keeping of maintenance and repairs to improve the ANDSF capabilities over time. The Deputy Commanding General stated that it is important to understand the vehicle repair process when recording vehicle maintenance repairs. The Deputy Commanding General also stated that when Afghan National Army vehicles require repair, they can be fixed at lower levels, from the brigade on down, or brought to a higher level, Corps Support Brigade maintenance site. The Deputy Commanding General further stated that for Afghan National Army vehicles, if a vehicle reaches the Corps Support Brigade and Regional Logistics Center, the NMS-GVS contractor and ANDSF personnel conduct a joint technical inspection and enter the vehicle into the tracking system. In addition, the Deputy Commanding General indicated that the type of repair needed, time needed for the repair, and unit workloads all determine which site will complete the work order. The Deputy Commanding General stated that work orders sent to the ANDSF are then completed at the Corps Support Brigade or Regional Logistics Center, while work orders sent to NMS-GVS contractor are

completed at an Equipment Maintenance Site for Afghan National Army vehicles, or at Regional Maintenance Center for Afghan National Police vehicles. The Deputy Commanding General stated that since contract award, the ANDSF repairs are tracked and recorded in Contract Data Requirement List - A008 "Maintenance Reports" after the Joint Technical inspection occurs. The Deputy Commanding General further stated that the NMS-GVS contractor provides the Maintenance Reports on a monthly basis. The Deputy Commanding General also stated that as of April 19, 2019, Maintenance Reports shows the levels of maintenance conducted by the ANDSF. However, for repairs completed outside of the Joint Technical Inspection, CSTC-A does not have the authority to compel the ANDSF to record its vehicle maintenance and repairs. Lastly, the Deputy Commanding General stated that for the Joint Technical Inspection that the NMS-GVS contractor conducts, the NMS-GVS contractor records every vehicle's maintenance and repairs assigned.

Our Response

Comments from the Deputy Commanding General partially addressed the specifics of the recommendation; therefore, the recommendation is unresolved. We reviewed the Maintenance Reports and agree that the updated reports show the levels of maintenance conducted for each work order completed by the ANDSF and the contractor. However, we disagree that the Maintenance Reports document and report the ANDSF capabilities and progression towards the three levels of maintenance. The Maintenance Reports do not show metrics (for example, percentages) of the ANDSF progression towards higher levels of maintenance. The updated Maintenance Report does not show the overall ANDSF progression in each of the three levels of maintenance throughout the NMS-GVS contract. We request that the Deputy Commanding General, responding on behalf of CSTC-A, reconsider his position on the recommendation and provide comments on how CSTC-A will show overall progression of the ANDSF capabilities through the three levels of maintenance. In addition, we request that CSTC-A provide the DoD OIG with an analysis (using the maintenance reports or other documentation) to show that the ANDSF is collectively progressing towards completing more work at each level of maintenance.

- c. Semiannually review the training and mentoring metrics for the contract requirements and document the results and, if necessary, modify the National Maintenance Strategy-Ground Vehicle Support contract training and mentoring requirements based on the semi-annual review results of the Afghan National Defense and Security Forces' progression towards the levels of maintenance.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, agreed with the recommendation, stating that any effort to improve ANDSF maintenance operations must include CSTC-A's ability to review and modify the NMS-GVS contract. The Deputy Commanding General stated that this ability to modify the NMS-GVS contract enables adjustments based on changes within the operational environment. The Deputy Commanding General stated that since contract award, CSTC-A has conducted semiannual Contract Management Reviews (CMR) for the NMS-GVS contract that help CSTC-A optimize efforts towards operational readiness and provide the most effective and efficient contractor support, while developing strategies to provide a sustainable capacity for the Government of the Islamic Republic of Afghanistan. The Deputy Commanding General also stated that CSTC-A conducted several CMRs since the award of the contract, with the most recent CMRs occurring in November 2018 and May 2019 in which CSTC-A determined that it did not find it necessary to modify the training and mentoring requirement. The Deputy Commanding General stated that during the CMRs, CSTC-A deliberately and extensively reviews contract performance, spending, and recommended modifications. The Deputy Commanding General also stated that aside from CSTC-A-led CMRs, an Army official conducts a monthly Program Management Review, which allows ACC-Warren and CSTC-A the opportunity to review the NMS-GVS contractor's performance to ensure they are meeting the NMS-GVS contract requirements. Lastly, the Deputy Commanding General stated that this review allows CSTC-A to modify the current NMS-GVS contract or any follow-on contracts if the requirements have changed.

Our Response

Comments from the Deputy Commanding General partially addressed the specifics of the recommendation; therefore, the recommendation is unresolved. We agree that since contract award, CSTC-A has performed semiannual CMRs that review the NMS-GVS contractor's performance to ensure the contractor is meeting the training and mentoring NMS-GVS contract requirements. Although the CMRs are taking place, we disagree that the CMRs provided by CSTC-A include a review of the training results to show ANDSF progression towards the three levels of vehicle maintenance. After reviewing the CMRs, we noted that the CMRs are geared towards the contractor's performance instead of ANDSF's ability to perform the different levels of vehicle repairs and maintenance. We request that the Deputy Commanding General, responding on behalf of CSTC-A, reconsider his position on the recommendation and provide additional comments on the final report that addresses CSTC-A's plan to review ANDSF progression towards the three levels of vehicle maintenance. In addition, we request that CSTC-A include

in the ongoing semiannual reviews an assessment of the training and mentoring metrics (as described in our response for Recommendation 1.b) that demonstrate the effectiveness of the NMS-GVS training program and provide the DoD OIG documentation showing the results of the review. Further, CSTC-A should provide documentation of contract modification, if necessary, based on the reviews.

- d. Semiannually review and document the Afghan National Defense and Security Forces' ability to meet the agreed-upon work split, then modify the contract requirements based on the work split review results.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, agreed with the recommendation, stating that any effort to improve ANDSF maintenance operations must include CSTC-A's ability to review and modify the NMS-GVS contract, specifically adjusting the work split requirements in order to meet changes within the operational environment. The Deputy Commanding General stated that since contract award, CSTC-A has conducted semiannual CMRs that discuss metrics, progress, contract requirements, and previous results and the ANDSF's ability to meet the work split. CSTC-A modified the requirements for work split after the base year. The Deputy Commanding General stated that the fact that CSTC-A modified the NMS-GVS contract requirements for work split after the base year shows CSTC-A is already responding to reviews of the work split results.

Our Response

Comments from the Deputy Commanding General addressed the specifics of the recommendation; therefore, the recommendation is closed. We acknowledge that since contract award, CSTC-A has performed semiannual CMRs to continuously review the contractor and ANDSF work split performance. Furthermore, the CMRs state that CSTC-A acknowledges the challenges for the ANDSF taking on the increased work split for each option year.

- e. Coordinate with the Afghanistan Ministry of Defense and Ministry of Interior to develop agreements (bilateral commitment letters or others) to reinforce Afghan National Defense and Security Forces' trainee attendance for the National Maintenance Strategy-Ground Vehicle Support training program.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, disagreed with draft Recommendation 1.e. regarding CSTC-A coordinating with the Afghanistan Ministry of Defense and Ministry of Interior to honor the existing bilateral commitment letters. The Deputy Commanding General stated that the bilateral commitment letters from May 24, 2018, and July 9, 2018, describe the efforts to ensure ANDSF fleets are maintained at optimum levels, but do not require the Afghanistan Ministry of Defense nor the Ministry of Interior to recruit, retain, and maintain trainees for the NMS-GVS training program. The Deputy Commanding General also stated that CSTC-A officials believe the current approach of positive coordination with the Ministry of Defense and Ministry of Interior reliable partners has incentivized them to recruit, retain, and maintain trainees for the NMS-GVS contract, which has resulted in the positive improvements in the ANDSF's capabilities. The Deputy Commanding General further stated that CSTC-A officials do not believe penalties will increase ANDSF readiness and in fact would decrease the positive achievements established with our Afghan partners. In response to our request for further clarification, the Office of the Secretary of Defense (Policy) Director of the Resource Policy and Requirements for Afghanistan stated on behalf of CSTC-A that the language in the specific section of both bilateral commitment letters were intended to apply to U.S.-funded training events that require trainees to leave Afghanistan. Therefore, these bilateral commitment letters are not applicable for U.S.-funded training events within Afghanistan, which includes the NMS-GVS training program. Furthermore, Office of Secretary Defense (Policy) Director of the Resource Policy and Requirements for Afghanistan stated that CSTC-A's disagreement with draft Recommendation 1.e stands since the Afghan trainees are not sent to the United States for training.

Our Response

Comments from the Deputy Commanding General partially addressed the recommendation; therefore, the recommendation is unresolved. Based on comments from the Deputy Commanding General, the existing bilateral commitment letters do not include requirements for the Ministry of Defense and Ministry of Interior to recruit, retain, and maintain trainees for the NMS-GVS training program and that enforcement of penalties do not improve the participation in training by the ANDSF. However, U.S. Government funds are being expended on the NMS-GVS training program and actions taken by CSTC-A have not resulted in improved ANDSF participation and the ANDSF trainee participation rate had not increased. Therefore, CSTC-A should implement new provisions to reinforce trainee attendance of the NMS-GVS training program. We request that the Deputy Commanding General, responding on behalf of CSTC-A, reconsider his position

on the recommendation and provide additional comments on the final that address how CSTC-A will reinforce ANDSF trainee attendance. In addition, we request documentation to show that CSTC-A has coordinated with the Ministry of Defense and Ministry of Interior to develop an agreement (bilateral commitment or other) to reinforce ANDSF trainee attendance throughout the duration of the NMS-GVS training program.

- f. Develop and implement policies and procedures for planning and executing future service acquisitions to ensure that, before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.**

CSTC-A Comments

The CSTC-A Deputy Commanding General, responding for the CSTC-A Commander, agreed with the recommendation, stating that the responsibility to ensure stated resources are available for contractors before awarding contracts for this contract is between the requiring activity, CSTC-A, and the contracting office, ACC-Warren. The Deputy Commanding General stated that two of three automated systems that make up the Core software systems, the Core M3 and the Core Property Book Module, were not available for immediate use when the NMS-GVS contract began. However, the Commanding General stated that the immediate need for ANDSF vehicle maintenance outweighed waiting for the additional automated systems. In addition, the Commanding General stated that Core M3 and Core Property Book Module are already online, provided to the NMS-GVS contractor and the ANDSF, and will be operational in FY 2020 for incorporation into the ANDSF maintenance strategy. The Commanding General further stated that CSTC-A has developed and implemented multiple process and policies to synchronize necessary external resources to ensure the NMS-GVS contractor will have all the resources necessary to meet the requirements of the contract. However, the Commanding General stated that certain conditions may warrant contract execution before the availability of a supplementary requirement and if justification supports, then the CSTC-A Commander reserves the right to permit contract award.

Our Response

Comments from the Deputy Commanding General addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation once we receive and review the newly implemented policies for planning and executing future service acquisitions to ensure that, before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.

Appendix

Scope and Methodology

We conducted this performance audit from June 2018 through December 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Criteria and Guidance Reviewed

We obtained and reviewed the criteria listed below to determine the contract officer's roles and responsibilities in making decisions regarding the contract requirements and the requiring activities' need to develop clearly defined contract requirements.²³

- Federal Acquisition Regulation Subpart 1.6, "Career Development, Contracting Authority, and Responsibilities," May 29, 2014
- Federal Acquisition Regulation Subsection 1.602-1, "Authority," May 29, 2014
- Federal Acquisition Regulation Subsection 1.602-2, "Responsibilities," May 29, 2014
- Federal Acquisition Regulation Subpart 37.5, "Management Oversight of Service Contracts," May 29, 2014
- Federal Acquisition Regulation Subsection 37.503, "Agency-head responsibilities," May 19, 2006
- Army Regulation 70-13, "Research, Development, and Acquisition: Management and Oversight of Service Acquisitions," July 30, 2010

Site Visits and Interviews

We interviewed Afghanistan Resources Oversight Council officials to obtain an understanding of the Office of Under Secretary of Defense for Policy's role in identifying the lessons learned from the A-TEMP contracts and implementing them into the development of the NMS-GVS contract.

We conducted site visits in September 2018 to ACC-Warren to understand the process for administering the NMS-GVS contract. While there, we interviewed the contracting officer and contract specialists to identify their roles and responsibilities for the requirements generation process, contract execution, and

²³ Requiring activities refer to CSTC-A in coordination with Army officials.

contract oversight of the NMS-GVS contract. During the site visit to ACC-Warren, we also met with PdM ATV personnel, including the contracting officer's representatives and administrative contract officer located throughout Afghanistan, to understand their roles and responsibilities regarding the oversight of the contractor's performance and execution of the NMS-GVS contract.

We interviewed CSTC-A representatives to identify CSTC-A's roles and responsibilities for developing the NMS-GVS contract requirements. Specifically, we assessed whether CSTC-A's NMS-GVS contract requirements implemented the lessons learned from the A-TEMP contracts. In addition, we held meetings with CSTC-A to understand the way forward for the NMS-GVS contract in helping the ANDSF become self-sufficient.

We interviewed personnel at CSTC-A and ACC-Warren who identified that the NMS-GVS contract requirements for the Core software systems were not available. The Core software system contract was awarded on December 18, 2017, as a separate contract to meet NMS-GVS contract requirements for the Core Vehicle Management System and Asset Management systems. We visited the contract administration office in November 2018 at ACC-New Jersey. While there, we met with the contracting officer and contract specialists to understand the development and implementation schedule for the Core software enhancements throughout the Afghan National Army and Afghan National Police sites.

Review of Documentation

We reviewed the three contracts under the A-TEMP—W52P1J-11-C-0014, W52P1J-11-C-0015, and W56HZV-15-C-0108—and prior reports issued by the Special Inspector General for Afghanistan Reconstruction and the DoD Office of Inspector General to identify the major shortfalls and historical issues within the program. We accessed the Electronic Data Access module within the Procurement Integrated Enterprise Environment software system to download contract documentation for these three A-TEMP contracts. Specifically, we reviewed the base contract, modifications and task orders for the three A-TEMP contracts to identify the purpose, scope, contract value and obligated amounts. We compared the contract values obtained in the Electronic Data Access module with the contract documents provided by PdM ATV. We confirmed that the contract amounts in the Electronic Data Access module matched the amounts in the contracts provided by PdM ATV. We also compared the major shortfalls of the A-TEMP contracts that were identified in the performance work statement of the NMS-GVS contract and determined whether CSTC-A, in coordination with PdM ATV and ACC-Warren, incorporated the lessons learned from the A-TEMP contracts and prior reports into the development of the NMS-GVS contract requirements. We accessed the Army's Paperless Contract File system to download the contract files for NMS-GVS contract W56HZV-17-C-0117. Specifically, we reviewed the pre-solicitation, solicitation, and

post-award documentation for the NMS-GVS contract to identify the process for developing the NMS-GVS contract requirements and the modifications that changed the purpose, scope, and value of the NMS-GVS contract.

To assess the NMS-GVS contract for training and mentoring and contractor logistics support requirements, we reviewed the following contract documents.

- NMS-GVS Acquisition Strategy
- NMS-GVS Acquisition Plans (June 10, 2016, and July 6, 2018)
- NMS-GVS Capabilities Assessment
- Contract Officer’s Representative Trip Reports
- Ministry of Interior Bilateral Commitment Letter
- Ministry of Defense Bilateral Commitment Letter
- NMS-GVS Contract Data Requirements List A008 (Maintenance Reports)
- NMS-GVS Contract Data Requirements List A002 (Weekly Reports)

We accessed the Army’s Paperless Contract File system to download the contract files for Core Systems contract W15QKN-18-C-0022. Specifically, we reviewed the pre-solicitation, solicitation, and post-award documentation for the Core systems contract to identify when requirements development began, when the contract was awarded, and when the contract would be completed. To assess the Core systems contract requirements, we reviewed the following contract documents.

- NMS-GVS Contract Data Requirements List A011 (Contractor Technical Training Plan)
- NMS-GVS Contract Data Requirements List A018 (Post Training Report)

Use of Computer-Processed Data

We did not use computer-processed data to perform this audit.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO), the DoD Office of Inspector General (DoD OIG), and Special Inspector General for Afghanistan Reconstruction (SIGAR) issued five reports discussing ground vehicles in Afghanistan. Unrestricted GAO reports can be accessed at <http://www.gao.gov>. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/reports.html/>. Unrestricted SIGAR reports can be accessed at <https://www.sigar.mil/>.

GAO

Report No. GAO-19-116, "Some Improvements Reported in Afghan Forces' Capabilities, but Actions Needed to Enhance DOD Oversight of U.S.-Purchased Equipment," October 2018

The report addressed what has been reported about ANDSF capabilities and capability gaps and the extent to which the DoD has information about the ANDSF ability to operate and maintain U.S.-purchased equipment. The GAO noted that while the DoD is conducting assessments, the assessments do not accurately evaluate the tactical abilities of the ANDSF, such as the capacity to operate and maintain equipment. Over time, the ANDSF has improved their capabilities but still relies on Coalition forces and contractors to fill critical capability gaps, such as those in vehicle maintenance.

DoD OIG

Report No. DODIG-2018-090, "Summary Report on U.S. Direct Funding Provided to Afghanistan," March 21, 2018

The report addressed the systemic challenges associated with CSTC-A's oversight of U.S.-direct funding provided to the Government of the Islamic Republic of Afghanistan identified in seven previous DoD OIG oversight reports. The DoD OIG found that CSTC-A officials did not enforce noncompliance penalties included in bilateral financial commitment letters due to potential impacts on the operational readiness of the ANDSF. Additionally, CSTC-A officials stated that they could not oversee all bilateral financial commitment letter requirements because of inadequate staffing and security concerns.

Report No. DODIG-2015-107, "Challenges Exist for Asset Accountability and Maintenance and Sustainment of Vehicles Within the Afghan National Security Forces," April 17, 2015

The report addressed whether CSTC-A and the Government of the Islamic Republic of Afghanistan's Ministries of Defense and Interior have controls in place to manage asset accountability for vehicles. The DoD OIG found that the ANDSF could not forecast maintenance and replacement requirements or identify vehicles that were not mission capable. The ANDSF had to rely extensively on contractors to maintain vehicles because the ANDSF lacked a system to track supplies necessary to perform the maintenance.

SIGAR

Report No. 16-49, "Afghan National Army: DoD Has Taken Steps to Remedy Poor Management of Vehicle Maintenance Program," July 2016

The report addressed whether the Afghanistan-Technical Equipment Maintenance Program contract and program were designed to promote the accurate assessment of Afghan vehicle maintenance needs, contractor performance, and cost containment. The SIGAR found that CSTC-A made inaccurate assumptions about the capacity of the Afghan National Army to manage the supply chain and conduct maintenance, underestimated the cost of spare parts, and established performance metrics that did not accurately assess contractor performance or progress towards contract goals.

Report No. 14-85, "Afghan Mobile Strike Force Vehicles: Contractor Met Requirements, but Long-Term Operation and Maintenance Remain a Concern," July 2014

The report addressed the extent to which a contractor met its contractual obligations to produce, deliver, train, and provide field support for the Afghan National Army-Mobile Strike Force Vehicles. The report evaluated the effectiveness of U.S. Government oversight and the capacity of the Afghan National Army to operate and maintain its Mobile Strike Force Vehicles. The SIGAR report found that the contractor could not consistently provide training and maintenance services to the Afghan National Army due to security issues and the limited logistics system. The Afghan National Army could not track spare part orders, which caused a delay in maintenance services being performed.

Management Comments

Combined Security Transition Command-Afghanistan

UNCLASSIFIED



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

DCOS/SA CSTC-A

26 September 2019

SUBJECT: Summary of the CSTC-A responses to the seven DoDIG recommendations for Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support (NMS-GVS) Contract."

1. BLUF: CSTC-A concurred with recommendations 1. a, 1. c – d, and 1. g, partially concurred with 1. b, and non-concurred with recommendations 1. e – f.
2. DoDIG Recommendations:
 - a. Recommendation 1. a: Develop training and mentoring requirements that track and measure Afghan National Defense and Security Forces' capabilities throughout the training program.
 - b. Recommendation 1. b: Document and report the Afghan National Defense and Security Forces' progression towards the three levels of maintenance and separately record the vehicle maintenance and repairs completed by the Afghan National Defense and Security Forces and the contractor.
 - c. Recommendation 1. c: Semi-annually review the training and mentoring metrics for the contract requirements and document results and, if necessary, modify the National Maintenance Strategy-Ground Vehicle Support contract training and mentoring requirements based on the semi-annual review results of the Afghan National Defense and Security Forces' progression towards the levels of maintenance.
 - d. Recommendation 1. d: Semi-annually review and document the Afghan National Defense and Security Forces' ability to meet the agreed-upon work split, then modify the contract requirements based on the work split review results.
 - e. Recommendation 1. e: Coordinate with the Afghanistan Ministry of Defense and the Ministry of Interior to honor the bilateral commitment letters to recruit, train, and maintain trainees for the National Maintenance Strategy-Ground Vehicle Support training program.
 - f. Recommendation 1. f: Enforce monetary penalties on the Afghanistan Ministry of

Prepared by: [REDACTED]

Phone: [REDACTED]

E-Mail: [REDACTED]

Current as: 21 September 2019

Approved by: [REDACTED]

UNCLASSIFIED

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

Defense and the Ministry of Interior for noncompliance with the bilateral commitment letters.

g. Recommendation 1. g: Develop and implement policies and procedures for planning and executing future service acquisitions to ensure that, before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.

3. CSTC-A Response:

Recommendation	Response	Reason
1.a	Concur	Recommend closing DoDIG recommendation. CSTC-A performed from contract inception.
1.b	Partially Concur	Recommend closing DoDIG recommendation. CSTC-A performed from contract inception. CSTC-A cannot provide ANDSF documentation of vehicle repairs outside the confines of the contract.
1.c	Concur	Recommend closing DoDIG recommendation. CSTC-A performed from contract inception.
1.d	Concur	Recommend closing DoDIG recommendation. CSTC-A performed from contract inception.
1.e	Non-concur	Recommend closing DoDIG recommendation. Facts do not support recommendation; no such commitment documented in the bilateral commitment letters.
1.f	Non-concur	Recommend closing DoDIG recommendation. Facts do not support recommendation.
1.g	Concur	Recommend closing DoDIG recommendation. CSTC-A developed and implemented multiple process policies to ensure the availability of required external resources for the contractor to meet the terms of the contract.

Prepared by: [REDACTED]
 Phone: [REDACTED]
 E-Mail: [REDACTED]

Current as: 21 September 2019
 Approved by: [REDACTED]

Combined Security Transition Command-Afghanistan (cont'd)



UNCLASSIFIED

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

DCOS/SA CSTC-A

26 September 2019

MEMORANDUM THRU

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

FOR Department of Defense Inspector General, 4800 Mark Center Drive, Alexandria,
VA 22350-1500

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, *"Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."*

1. The purpose of this memorandum is to provide the Combined Security Transition Command – Afghanistan (CSTC-A) response to the DoDIG's draft report for Project Number D2018-D000RG-0170.000, *"Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support (NMS-GVS) Contract."* In addition to responses for each recommendation, CSTC-A provides the following background on the NMS-GVS contract.

a. NMS-GVS contract is multi-faceted, with provisions on training, mentoring, and contractor logistics support aimed at growing the ANDSF vehicle maintenance capabilities. The NMS-GVS contract is a key element in CSTC-A efforts to create a sustainable, effective, and affordable ANDSF.

b. The NMS-GVS contract increased operational readiness across the Afghan National Defense Security Forces (ANDSF) by increasing the capacity of the ANDSF to conduct maintenance and repair operations and by providing effective contracted logistics support. Since the beginning of the NMS-GVS contract through mid-September 2019, about 107,000 vehicles have been repaired, increasing the operational readiness for the Afghan National Army (ANA) from 50 to 62 percent. In addition, the Afghan National Police (ANP) remained approximately 100 percent.

c. Under training by the NMS-GVS contractor, PAE, the ANDSF developed their own organic vehicle recovery capability that could take vehicles to repair sites for maintenance. Starting in May and through mid-September 2019, the ANDSF's organic vehicle recovery personnel recovered over 1,700 vehicles, which is about 27 percent of the total recoveries. In addition, the NMS-GVS contract has seen weekly increases in the number of ANDSF recoveries. During some weeks, the ANDSF recoveries exceeds

UNCLASSIFIED

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

that of the NMS-GVS contractor. This expanding effort and capacity building demonstrates ANDSF commitment to self-sufficiency and is reflective of notable progress.

d. The Afghan Component Overhaul Program (ACOP) is a NMS-GVS element that rebuilds vehicle components (such as starters, transmission, alternators, etc.) instead of purchasing new components. Since starting operations in November 2017, this program has rebuilt over 25,000 components, which resulted in about \$125 million in total cost savings and should result in further cost avoidance for the ANDSF.

e. Over the course of the NMS-GVS contract, from 2016, when CSTC-A developed the contract requirements, to 2019, when the first option year ended, several factors drove the need for contract modifications. These contract modifications led to an increase in cost. As of the writing of this response, the estimated contract value for the NMS-GVS contract through Option Year 1 was \$573.5 million.¹

f. Additional factors outside the NMS-GVS contract's control also arose over the course of the contract. For example, hostile combat operations often prevented the ANDSF from filling available training slots. At other times, trained ANDSF personnel were re-tasked to handle higher priority missions, leaving the trained individual unable to conduct vehicle maintenance and repair. Finally, as with ANDSF personnel at-large, trained vehicle maintenance personnel were lost to attrition. The ANDSF maintains an average attrition rate of 2.2 percent per month. Over the course of year, this accumulates to an attrition rate of about 25 percent each year, contributing to less than desirable effectiveness.

g. Despite these challenges, the NMS-GVS contract is realizing improvements. For example, with work split metrics, the DoDIG report, which conducted fieldwork for approximately three days around 20 October 2018, and only considered eight months from January 2018 to August 2018, states the Afghan National Army averaged 11 percent and the Afghan National Police averaged 1 percent of the work split.

i. However, recent analysis shows they are notably higher. Using the second quarter FY 19 DoDIG data call (Enclosure 1), the Afghan National Army averaged 47 percent and the Afghan National Police (ANP) averaged 17 percent of the work split from December 2018 to March 2019.

¹ The DoDIG report states, "CSTC-A paid approximately \$2.8 billion in contractor support to maintain vehicles and train the ANDSF...;" however, the report's footnote 17 indicates \$2.8 billion is not purely reflective of the NMS-GVS contract. Instead, footnote 17 clarifies the \$2.8 billion is in reference to the summation of five other consolidated contracts and the NMS-GVS contract through Option Year 1. As the only subject and scope of the report is the audit of the NMS-GVS contract, \$573.5 million is the most appropriate amount to consider for the report.

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

ii. As CSTC-A continues executing the NMS-GVS contract, it looks forward to additional positive gains.

2. Recommendation 1.a: CSTC-A concurs, provides the following details, and respectfully requests closure of this recommendation.

Recommendation 1.a: Develop training and mentoring requirements that track and measure Afghan National Defense and Security Forces' capabilities throughout the training program.

a. CSTC-A appreciates the hard work of the DoDIG audit team and concurs that any effort to improve ANDSF maintenance operations must include programmatic training and mentoring requirements that improve the ANDSF organic maintenance capabilities over time.

b. Develop training and mentoring requirements. At the inception of the contract, CSTC-A developed training and mentoring requirements to track and measure ANDSF capabilities (Enclosure 2, reference NMS-GVS contract Sections C.2., General Requirements, and C.3. Performance Requirements). The NMS-GVS contractor, PAE, is contractually obligated to provide training and mentoring in the following areas: maintenance management, maintenance, supply chain management, maintenance supply support, warehouse management, and warehouse supply support at both the maintenance and management level. By contract, training and mentoring efforts must include training classes and over the shoulder mentoring by experienced personnel.

c. Requirements must track and measure ANDSF capabilities throughout the training program. PAE closely tracks the contractual training and mentoring requirements. PAE tracks weekly trained personnel and reports to CSTC-A (Enclosure 3). PAE further tracks and reports on specific training classes, which range from basic mechanics to maintenance management (Enclosure 4). CSTC-A periodically analyzes PAE's weekly reports to measure ANDSF capabilities throughout the training program.

d. Response to recommendation. As shown in the referenced enclosures, because the established training and mentoring requirements are tracked throughout the training program and CSTC-A evaluates the capabilities of the ANDSF, CSTC-A believes the recommendation has been answered and respectfully requests closure of Recommendation 1.a.

3. Recommendation 1.b: CSTC-A partially concurs, provides the following details, and respectfully requests closure of this recommendation.

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

Recommendation 1.b: Document and report the Afghan National Defense and Security Forces' progression towards the three levels of maintenance and separately record the vehicle maintenance and repairs completed by the Afghan National Defense and Security Forces and the contractor.

a. CSTC-A appreciates the hard work of the DoDIG audit team and concurs that any effort to improve ANDSF maintenance operations must include accurate record keeping of maintenance and repairs in order to improve the ANDSF capabilities over time.

b. Document and report the ANDSF's progression towards the three levels of maintenance. With respect to recording vehicle maintenance and repairs, it is important to understand the vehicle repair process. When an ANA vehicle requires repair, it can be fixed at lower levels, from the brigade on down, or brought to a higher level Corps Support Brigade (CSB) maintenance site. When an ANP vehicle requires repair, it can be fixed at a lower level Provincial Headquarters (PHQ), or brought to a higher level Regional Logistics Center (RLC). If a vehicle reaches the CSB and RLC, PAE and ANDSF personnel conduct a joint technical inspection and enter the vehicle into the tracking system. Once a vehicle is entered in the tracking system, it receives a work order. The type of repair needed, timeliness needed for the repair, and unit workloads, all determine which site will complete the work order. Work orders sent to the ANDSF are then completed at the CSB or RLC, while work orders sent to PAE will be completed at an Equipment Maintenance Site (EMS) for ANA vehicles, or at Regional Maintenance Center (RMC) for ANP vehicles.

c. Enclosure 5 provides an example of how vehicle repairs are tracked once a vehicle has gone through the joint inspection process. As shown in Enclosure 5, this includes reporting on the level of maintenance. PAE compiles and reports this data to CSTC-A monthly.

d. Separately record the vehicle maintenance and repairs completed by the ANDSF. As discussed in 3.c, the ANDSF repairs are recorded after the Joint Technical inspection occurs. However, for repairs completed outside of the Joint Technical Inspection, CSTC-A does not have the authority to compel the ANDSF to record its vehicle maintenance and repairs. While CSTC-A trains, advises, and assists the ANDSF in building their vehicle maintenance capabilities, to include record-keeping. CSTC-A cannot provide ANDSF documentation of vehicle repairs completed outside the confines of the NMS-GVS contract.

e. Separately record the vehicle maintenance and repairs completed by the contractor. As part of the Joint Technical Inspection that the contractor conducts, PAE records every vehicle's maintenance and repairs assigned. Since the inception of the contract, PAE has compiled and reported this information to CSTC-A.

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

f. Response to recommendation. As shown in the referenced enclosure, because the contractor, PAE, reports detailed vehicle maintenance and repair work, to include maintenance level progression of the ANDSF to CSTC-A, we believe the recommendation has been answered and respectfully requests closure of Recommendation 1.b. CSTC-A cannot provide ANDSF documentation of vehicle repairs completed outside the confines of the NMS-GVS contract.

4. Recommendation 1.c: CSTC-A concurs, provides the following details, and respectively requests closure of this recommendation.

Recommendation 1.c: Semi-annually review the training and mentoring metrics for the contract requirements and document results and, if necessary, modify the National Maintenance Strategy-Ground Vehicle Support contract training and mentoring requirements based on the semi-annual review results of the Afghan National Defense and Security Forces' progression towards the levels of maintenance.

a. CSTC-A appreciates the hard work of the DoDIG audit team and concurs that any effort to improve ANDSF maintenance operations must include CSTC-A's ability to review and modify the NMS-GVS contract. This ability to modify the NMS-GVS contract enables adjustments based on changes within the operational environment.

b. Semi-annually review the training and mentoring metrics for the contract requirements and document results. CSTC-A conducts semi-annual Contract Management Reviews (CMR) for the NMS-GVS contract. The CMR is designed to help CSTC-A optimize efforts towards operational readiness and provide the most effective and efficient contractor support, while developing strategies to provide a sustainable capacity for the Government of the Islamic Republic of Afghanistan (GIROA). CSTC-A conducted several CMRs since the inception of the contract. The most recent CMRs for the NMS-GVS contract occurred in November 2018 and May 2019.

c. Aside from CSTC-A-led CMRs, an ACC-Warren Contracting Officer conducts a monthly Program Management Review (PMR), which consists of reviewing contractor surveillance by the CSTC-A Contracting Officer's Representative.

d. Notably, these forums provide the ACC-Warren Contracting Officer and CSTC-A the opportunity to review PAE's performance to ensure they are meeting the requirements of the contract, for example the training and mentoring operations.

e. If necessary, modify the National Maintenance Strategy-Ground Vehicle Support contract training and mentoring requirements based on the semi-annual review results. The CMR deliberately and extensively reviews contract performance, spending, and recommended modifications. This review allows CSTC-A to modify current or follow-on

5

UNCLASSIFIED

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

contracts if the requirements have changed. At the NMS-GVS CMRs, CSTC-A did not find it necessary to modify the training and mentoring requirements. However, the CMR process provides a mechanism for CSTC-A to do so if it determines modifications are required.

f. Response to recommendation. Because frequent reviews, including semi-annual reviews on training and mentoring requirements, have been conducted since the inception of the contract and those reviews can lead to contract modification processes, CSTC-A believes the recommendation has been answered and respectfully requests closure of Recommendation 1.c.

5. Recommendation 1.d: CSTC-A concurs, provides the following details, and respectfully requests closure of this recommendation.

Recommendation 1.d: Semi-annually review and document the Afghan National Defense and Security Forces' ability to meet the agreed-upon work split, then modify the contract requirements based on the work split review results.

a. CSTC-A appreciates the hard work of the DoDIG audit team and concurs that any effort to improve ANDSF maintenance operations must include CSTC-A's ability to review and modify the NMS-GVS contract, specifically adjusting the work split requirements in order to meet changes within the operational environment.

b. Semi-annually review and document the Afghan National Defense and Security Forces' ability to meet the work split. CSTC-A conducts a semi-annual review of the ANDSF's ability to meet the agreed-upon work split. This semi-annual review occurs during the CMR process discussed in paragraph 4.b. Among discussions on metrics, progress, and contract requirements, the NMS-GVS contract's CMR also discusses previous results and the ANDSF's ability to meet the work split.

c. Modify the contract requirements based on the work split review results. CSTC-A modified the requirements for work split after the base year (Enclosure 6). The fact that CSTC-A modified the NMS-GVS contract requirements for work split after the base year shows CSTC-A is already responding to reviews of the work split results.

d. Response to recommendation. As CSTC-A conducts semi-annual reviews of the ANDSF's ability to meet the agreed-upon work split, and modified the contract requirements based on the review results, CSTC-A believes the recommendation has been answered and respectfully requests closure of Recommendation 1.d.

6. Recommendation 1.e: CSTC-A non-concurs, provides the following details, and respectfully requests closure of this recommendation.

6

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

Recommendation 1.e: Coordinate with the Afghanistan Ministry of Defense and the Ministry of Interior to honor the bilateral commitment letters to recruit, train, and maintain trainees for the National Maintenance Strategy-Ground Vehicle Support training program.

a. Coordinate with the Afghanistan Ministry of Defense and the Ministry of Interior to honor the bilateral commitment letters. Even though the bilateral commitment letters do not specifically require the Afghanistan Ministry of Defense (MOD) (Enclosure 7) nor the Ministry of Interior (MOI) (Enclosure 8) to recruit, retain, and maintain trainees for the NMS-GVS training program, they both describe the efforts to ensure ANDSF fleets are maintained at optimum levels. CSTC-A believes the current approach of positive coordination with MOD and MOI reliable partners has incentivized them to recruit, retain, and maintain trainees for the NMS-GVS contract, which has resulted in the positive improvements in the ANDSF's capabilities discussed earlier in this response.

b. Response to recommendation. We do not believe penalties will increase ANDSF readiness and would, in fact, decrease the positive achievements we have established with our Afghan partners. Also, because the bilateral commitment letters do not specifically require the Afghanistan MOD or MOI to recruit, retain, and maintain trainees for the NMS-GVS training program, CSTC-A believes the recommendation has been answered and respectfully requests closure of Recommendation 1.e.

7. Recommendation 1.f: CSTC-A non-concurs, provides the following details, and respectfully requests closure of this recommendation.

Recommendation 1.f: Enforce monetary penalties on the Afghanistan Ministry of Defense and the Ministry of Interior for noncompliance with the bilateral commitment letters.

a. Enforce penalties on the MOD and the MOI for noncompliance with the bilateral commitment letters. As mentioned in paragraph 6.a., the bilateral commitment letters do not require the Afghanistan Ministry of Defense (MOD) nor the Ministry of Interior (MOI) to recruit, retain, and maintain trainees for the NMS-GVS training program. As such, there are no provisions from which to enforce penalties for NMS-GVS training shortfalls. In addition, the current CSTC-A approach of positive coordination with MOD and MOI, reliable partners, has incentivized them and led to the positive improvements in the ANDSF's capabilities discussed earlier in this response.

b. Response to recommendation. CSTC-A believes the recommendation is not warranted and respectfully requests closure of Recommendation 1.f.

7

UNCLASSIFIED

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

8. Recommendation 1.g: CSTC-A concurs with this recommendation. Based on changes to policies, CSTC-A respectfully requests closure of this recommendation.

Recommendation 1.g: Develop and implement policies and procedures for planning and executing future service acquisitions to ensure that, before awarding contracts, stated resources are available for the contractors to be able to meet contract requirements.

a. Develop and implement policies/procedures for future acquisitions to ensure resources are available for contractors to meet contract requirements. The responsibility to ensure stated resources are available for contractors before awarding contracts is a shared responsibility. For this contract, it is between the requiring activity, CSTC-A, and the contracting office, ACC-Warren. Two of three automated systems that make up the Core software systems, the Core Military Maintenance Management (Core M3) and the Core Property Book Module (Core PBM), were not available for immediate use when the NMS-GVS contract began. However, the immediate need for ANDSF vehicle maintenance outweighed waiting for the additional automated systems. Core M3 and Core PBM are already online, provided to PAE and the ANDSF, and will be operational in FY 20 for incorporation into the ANDSF maintenance strategy.

b. Response to recommendation. CSTC-A concurs with the recommendation. CSTC-A has developed and implemented multiple process policies to synchronize necessary external resources to ensure the contractor will have all the resources necessary to meet the requirements of the contract. However, certain conditions may warrant contract execution before the availability of a supplementary requirement and if justification supports, then the CSTC-A Commander reserves the right to permit contract award.

9. We appreciate DoD IG's audit to determine whether the DoD developed training, mentoring, and contractor logistics support requirements for the National Maintenance Strategy-Ground Vehicle Support (NMS-GVS) contract. The observations and insights ensure we are best equipped to meet the ANDSF's needs when building capacity to repair and maintain ANDSF vehicles.

2

Combined Security Transition Command-Afghanistan (cont'd)

UNCLASSIFIED

CSTC-A

SUBJECT: Response to Draft Report for DoDIG Project Number D2018-D000RG-0170.000, "Audit of the DoD Requirements for the Afghan National Defense Security Forces National Maintenance Strategy – Ground Vehicle Support Contract."

10. Point of Contact is [REDACTED] CSTC-A, Kabul, Afghanistan, [REDACTED]

Encl

1. DoDIG Second Quarter 2019 Data Call
2. NMS-GVS Base Contract, 23 May 2017
3. Training Statistics Report, 31 July 2019
4. Post Training Report, 23 August 2019
5. Maintenance Report, 28 August 2019
6. NMS-GVS Contract Modification P00008, 30 August 2018
7. MOD Bilateral Commitment Letter, 20 May 2018
8. MOI Bilateral Commitment Letter, 9 July 2018


ROBERT L. MARION
Major General, U.S. Army
DCG, CSTC-A

9

UNCLASSIFIED

Acronyms and Abbreviations

ACC	U.S. Army Contracting Command
ANDSF	Afghan National Defense and Security Forces
A-TEMP	Afghanistan-Technical Equipment Maintenance Program
CSTC-A	Combined Security Transition Command-Afghanistan
CMR	Contract Management Review
NATO	North Atlantic Treaty Organization
NMS-GVS	National Maintenance Strategy-Ground Vehicle Support
PdM ATV	Product Manager Allied Tactical Vehicles

Whistleblower Protection

U.S. DEPARTMENT OF DEFENSE

Whistleblower Protection safeguards DoD employees against retaliation for protected disclosures that expose possible waste, fraud, and abuse in government programs. For more information, please visit the Whistleblower webpage at <http://www.dodig.mil/Components/Administrative-Investigations/Whistleblower-Reprisal-Investigations/Whistleblower-Reprisal/> or contact the Whistleblower Protection Coordinator at Whistleblowerprotectioncoordinator@dodig.mil

For more information about DoD OIG reports or activities, please contact us:

Congressional Liaison

703.604.8324

Media Contact

public.affairs@dodig.mil; 703.604.8324

DoD OIG Mailing Lists

www.dodig.mil/Mailing-Lists/

Twitter

www.twitter.com/DoD_IG

DoD Hotline

www.dodig.mil/hotline



DEPARTMENT OF DEFENSE | OFFICE OF INSPECTOR GENERAL

4800 Mark Center Drive
Alexandria, Virginia 22350-1500
www.dodig.mil
DoD Hotline 1.800.424.9098

