Management Advisory: Handling of Equipment With Sensitive Information and Records Retention Requirements Related to the Withdrawal From Afghanistan

AUGUST 11, 2021

Report No. DODIG-2021-111
MEMORANDUM FOR DISTRIBUTION

SUBJECT: Management Advisory: Handling of Equipment With Sensitive Information and Records Retention Requirements Related to the Withdrawal From Afghanistan (Report No. DODIG-2021-111)

We are providing this report for information and use. This management advisory compiles weaknesses identified in nine Government Accountability Office, DoD Office of Inspector General, Special Inspector General for Afghanistan Reconstruction, and Special Inspector General for Iraq Reconstruction reports (issued between 2003 and 2020) related to not properly removing sensitive data from controlled inventory items; and poor recordkeeping, such as the lack of supporting documentation with respect to the disposal and retrograde of equipment and missing personnel records. The Under Secretary of Defense for Acquisition and Sustainment; Under Secretary of Defense for Policy; Commander, U.S. Central Command; Commander, U.S. Army Central; Commander, U.S. Transportation Command; Commander, U.S. Army Materiel Command; Commanding General, U.S. Army Sustainment Command; Director, Joint Staff; Army Deputy Chief of Staff for Logistics, G-4; and the Director, Defense Contract Management Agency should read this report to be aware of current policy, challenges, and opportunities for improvement regarding the sanitization of sensitive information, and the retention of property disposition and personnel records as the DoD departs Afghanistan.

This report contains no recommendations for action. We did not issue a draft report, and no written response is required. If you have any questions, please contact me at [redacted].

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Background

The purpose of this management advisory is to assist U.S. military, civilian, and contractor personnel responsible for the withdrawal of U.S. forces from Afghanistan with:

- proper handling of equipment containing sensitive information and
- satisfying the requirements to retain administrative records.

Properly removing personally identifiable information and protected health information from equipment, including medical equipment, laptops, and cell phones, is critical to prevent disclosure of this information to those without a need to know. In addition, the U.S. military must properly retain all records associated with the decisions to retrograde, dispose of, or transfer excess equipment for future use. Records will allow the commands to determine whether all decisions were properly justified and develop lessons learned based upon those decisions to apply to future contingency operations. Finally, the retention of records of where U.S. military, civilian, and contractor personnel served in Afghanistan is critical in the case of potential exposure to toxins and other elements of war.

Previous reports by the Government Accountability Office (GAO), DoD Office of Inspector General (OIG), Special Inspector General for Afghanistan Reconstruction (SIGAR), and Special Inspector General for Iraq Reconstruction (SIGIR), identified weaknesses with the DoD’s handling and retention of equipment disposition and personnel records. The weaknesses previously reported provide an opportunity to improve record retention by applying lessons learned from past efforts in both Iraq and Afghanistan to the ongoing drawdown. This is the second report the DoD OIG has issued this fiscal year addressing the withdrawal of U.S. forces and equipment from Afghanistan. The first report, issued in December 2020, related to the retrograde of U.S. military equipment from Afghanistan and the lessons learned from five previous DoD OIG audit reports issued between 2013 and 2015. Those five reports identified weaknesses in the areas of property accountability, security, and contractor oversight. This second report can serve as a reference for personnel overseeing property disposition and records retention in Afghanistan and future contingency operations. See the Appendix for a list of the nine reports referenced in this management advisory and the scope and methodology of our review.
Withdrawal of U.S. Forces From Afghanistan

On February 29, 2020, the United States and the Taliban signed a conditional agreement to remove all U.S. forces from Afghanistan by April 2021. According to the agreement, the initial withdrawal involved a reduction of U.S. forces to 8,600 by mid-July 2020. In August 2020, the President announced that the United States would further reduce the number of forces in Afghanistan to approximately 5,000 by November 2020. On April 14, 2021, the President announced that the United States would remove all its forces from Afghanistan by September 11, 2021, the 20th anniversary of the September 11, 2001, terrorist attacks. On July 8, 2021, the President announced that the United States is on track to meet the target date and the military mission in Afghanistan will conclude on August 31, 2021.

In addition to executing the full withdrawal of its forces, the U.S. military must ensure the proper removal of sensitive data from equipment it plans to either retrograde back to the United States or dispose of in theater.

Ensuring Equipment is Free of Sensitive Information

Proper removal of sensitive information, such as personally identifiable information and protected health information, from equipment—including medical equipment, laptops, and cell phones—is critical to prevent disclosure of this information to those without a need to know. Army Regulation 735-5 requires controlled inventory items to be handled in a special manner to ensure their safekeeping and integrity. In addition, the 401st Army Field Support Brigade's standard operating procedures for property accountability require unit personnel to clear controlled inventory items with hard drives and automation of all data before turning the equipment in as excess. The brigade's standard operating procedures further state that if the unit does not properly clear the item, then Redistribution Property Assistance Team personnel cannot accept the equipment. However, a 2014 DoD OIG audit found that the 401st Army Field Support Brigade personnel at the Kandahar Airfield, Afghanistan, Redistribution Property Assistance Team yard did not ensure that controlled inventory items with hard drives were wiped before accepting the equipment from the unit. For example, units did not clear the sensitive data from four navigation systems and a counter radio-controlled improvised explosive device system, which protects our warfighters against roadside bombs. Unless equipment is properly processed by unit personnel before turning it in to Redistribution Property Assistance Team personnel, there is a risk of theft and compromise of sensitive information.

1 “Agreement for Bringing Peace to Afghanistan Between the Islamic Emirate of Afghanistan Which is Not Recognized by the United States as a State and is Known as the Taliban and the United States of America,” February 29, 2020.
In addition to military equipment, the U.S. military medical treatment facilities (MTFs) in Afghanistan have equipment containing sensitive information, which requires special handling. For example, MTFs have diagnostic medical devices, such as electrocardiogram equipment, computerized tomography equipment, and magnetic resonance imaging equipment, that electronically store patient information. These devices capture personally identifiable information and protected health information of U.S. military and civilian personnel. A 2003 DoD OIG audit found that the protection of patient information in MTFs could be improved, and procedures for disposing of medical equipment and maintaining patient information needed clarification. For example, MTF personnel stated that they were not aware of any requirements to remove patient information from medical devices before disposal and were confused over which department was responsible for the sanitation process.

According to Air Force Instruction 41-201, the removal of all protected health information from equipment is required before it is sent for disposal. Furthermore, for medical equipment that is to be turned in to the Defense Logistics Agency (DLA) for disposal, the DLA's Turn-In SmartBook requires that all medical and dental equipment will be assumed to contain personal identifiable information. This requires the equipment to be sanitized in accordance with service procedures and have DD Form 1348-1A, “Issue Release/Receipt Document,” July 1991, completed to verify that there is no personally identifiable information remaining on the equipment.

In June 2021, Defense Health Agency (DHA) officials stated that draft DHA Procedural Instruction 6015 will be implemented to regulate the handling of equipment containing sensitive information. Specifically, the draft DHA Procedural Instruction 6015, once implemented, will become the overarching policy for DoD and will include a requirement for all information contained within storage media, including hard drives, cards, memory chips, and external drives, to be removed using destruction methods approved by DoD regulation and policy. A signed and dated DLA Form 2500, “Certificate of Hard Drive Disposition,” May 2017, will be required to be attached to each machine. The form must include the phrase “cleaned/scrubbed,” and list the method used to clear the data.

As part of the drawdown of its forces, the U.S. military must also determine the disposition of all military and U.S. Government-provided equipment located throughout bases across Afghanistan. After making the disposition decision for individual pieces of equipment, U.S. military and contractor personnel must follow existing guidance for the retention of records.

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7 DLA Disposition Services, “Turn-In SmartBook,” 2020.
8 DHA Procedural Instruction 6015, “Property Accountability and Management of General Equipment,” DRAFT. (Note: this Procedural Instruction is still in draft and has not been published per the DHA.)
DoD Requirements to Maintain Records

The DoD has issued multiple policies and procedures for creating a records management program for maintaining administrative records during contingency operations. All DoD organizations, regardless of organizational level, create administrative records when performing common functions that support the organization's mission activities, but do not directly document the performance of mission functions. Administrative records relate to activities such as budget and finance, human resources, medical, equipment and supplies, facilities, public and congressional relations, contracting, and similar administrative housekeeping or facilitative functions common to most agencies.

Chairman of the Joint Chiefs of Staff Instruction 5760.01A

Chairman of the Joint Chiefs of Staff Instruction 5760.01A provides guidance for the creation and preservation of records for combatant commands during contingency and wartime operations. Specifically, the Instruction requires that combatant commands include records management annexes in appropriate operations plans, concept plans, and operational orders specifying how records will be collected and retained.

DoD Instruction 5015.02

DoD Instruction 5015.02 states that the information and intellectual capital contained in DoD records will be managed as national assets. Effective and efficient management of records provides the information foundation for decision making at all levels, mission planning and operations, personnel and veteran services, legal inquiries, business continuity, and preservation of U.S. history. According to the Instruction, records, regardless of media or security classification, will be created, maintained and used, disposed, and preserved to document the transaction of business and mission in wartime and peacetime.

Specifically, DoD Instruction 5015.02 states that records generated as a result of campaigns and contingency operations in the combatant command areas of operation are operational records and must be managed pursuant to the Instruction. Additionally, DoD Component heads are to direct contractors performing DoD program functions to create and maintain records to document the functions performed. Contracts must specify the delivery to the U.S. Government of all the data required for adequate documentation of the contractor-operated program in accordance with the Code of Federal Regulations. Finally, combatant commanders are responsible for operational records to ensure proper management of these records throughout their life cycle, and may task any subordinate unit or command, including Service component commands and theater special operations commands, to fulfill this responsibility.

9 Chairman of the Joint Chiefs of Staff Instruction 5760.01A, “Records Management Policy for the Joint Staff and Combatant Commands,” July 18, 2012.
U.S. Central Command Regulation 25-50

U.S. Central Command (USCENTCOM) Regulation 25-50 prescribes administrative instructions and procedural guidance for records maintenance, disposition, and management of the USCENTCOM Records Management program.\textsuperscript{11} This regulation applies to all Service component commands, Joint Task Forces (JTFs), and all other subordinate functional components or operational forces that are immediately responsive to the Commander of USCENTCOM. The regulation directs Service component commands and JTFs to collect all relevant records, regardless of classification, media, or caveats, and archive them with USCENTCOM quarterly.

According to USCENTCOM Regulation 25-50, the most important records any combatant command or JTF will ever create are contingency records, which document military operations designated by the Secretary of Defense or as a matter of law according to the United States Code.\textsuperscript{12} The end of any contingency operation will result in a cut-off of all records produced by the JTF, and the transfer of all records created by the JTF during the contingency period to USCENTCOM for placement in USCENTCOM Headquarters central records repositories. The regulation contains a list of critical records to ensure that permanent historically significant documents generated during crisis and contingency operations are collected and maintained.

Department of the Army Pamphlet 25-403

Department of the Army Pamphlet 25-403 provides operational procedures and guidelines for recordkeeping within the Army.\textsuperscript{13} The laws and regulations that govern recordkeeping requirements during peacetime or while in garrison also apply to recordkeeping during a contingency operation. However, the nature of a contingency operation makes good recordkeeping even more critical. Without properly documenting contingency operations, the Army risks losing important portions of its history, can lose the ability to formulate lessons learned, and most importantly, can fail to protect the rights and interests of the deployed individual Soldiers and civilians.

Records Associated With the Disposition of Excess Equipment From Afghanistan

As of July 5, 2021, the U.S. military had transferred, disposed of, or retrograded nearly 90 percent of the billions of dollars of its equipment previously located across multiple bases in Afghanistan. This included equipment used by the military, along with equipment provided by the U.S. Government to contractors in support of military operations.

Previous Problems With Supporting Documentation

Maintaining equipment records for transfers, disposals, and retrograde for Afghanistan is critical. The GAO and DoD OIG previously issued three reports on problems with supporting documentation with respect to DLA Disposition Services’ disposal and retrograde of equipment.

Lack of Supporting Documentation for Disposal of Equipment

Prior reports by the GAO and DoD OIG have documented the loss of hundreds of millions of dollars worth of equipment because records supporting the disposition of equipment were not maintained. In December 2012, the GAO reported that the DoD was unable to fully document how decisions regarding disposal of U.S. equipment in Afghanistan were made.\(^\text{14}\) For example, the DoD did not consistently document the acquisition cost, fair market values, and estimated transportation costs of retrograded equipment, which are all used to decide whether the equipment will be disposed of or retrograded. The DoD took some actions to address this inconsistency by developing guidance in 2013, directing Military Departments to conduct cost comparisons to help the commands determine whether to retrograde or dispose of equipment. In response to a 2014 inquiry from SIGAR, the DoD reported that the guidance developed in response to the GAO report was effectively implemented in Afghanistan. Additionally, the U.S. Army Audit Agency reviews the documentation and vetting processes periodically in order to ensure consistency and policy compliance.

DoD Manual 4160.21 requires that accounting records for equipment, including disposal turn-in documents, be maintained so that each item can be traced from receipt to final disposition.\(^\text{15}\) For example, when equipment is going to be demilitarized, a disposal turn-in document is required. The disposal turn-in document provides a record of the equipment’s disposition. However, a 2013 DoD OIG audit found that DLA Disposition Services personnel could not appropriately account for 62 of 93 disposal turn-in documents requested.\(^\text{16}\) Specifically, the DoD OIG found that the locations on the disposal turn-in documents were different from the locations recorded, disposal turn-in documents were not entered into the accountability records, and the quantity or the status of the equipment in the accountability records was inaccurate. In addition, the audit team was unable to physically locate some of the equipment in its testing sample. The unaccounted for disposal turn-in documents and missing equipment increased the risk of fraud, theft, and improper release of controlled inventory items in Afghanistan.


Lack of Retrograde Equipment Records

As for retrograde, Army Regulation 710-2 states that all equipment acquired by the Army needs to be accounted for and that property book records for nonexpendable items must provide a complete audit trail for all transactions. However, a 2014 DoD OIG report identified that the Army did not properly account for $424.5 million of equipment deployed to Afghanistan from 2001 through 2013. This lack of accountability left the equipment at increased risk of being lost, destroyed, or abandoned in Afghanistan without the Army’s knowledge. As a result of the report, the Army implemented monthly reconciliations of the theater property book, but ultimately the Army could not account for the equipment that was never established in theater property records.

Task Force Jesup

In 2014, the Army created Task Force Jesup to address an accountability trail of $2.2 billion worth of equipment lost in Afghanistan from 2006 to 2015. This task force searched through records to reconstruct the various property transactions for thousands of missing pieces of equipment ranging from handheld items to mine-resistant, ambush-protected vehicles. For example, if a unit identified any on-base equipment that was missing an accountability record, the unit turned the equipment into the task force, which performed research to re-establish the accountability trail for the equipment. By January 2016, Task Force Jesup had brought to accountability $1.4 billion of previously lost equipment.

However, after the August 2021 withdrawal of all U.S. forces from Afghanistan, the U.S. military will be physically unable to search for lost equipment on its various bases throughout Afghanistan. Instead, it will have to rely solely upon its paper and electronic records to search for equipment lost in Afghanistan. Therefore, it is imperative that all commands and units responsible for property accountability, especially for the disposition of excess military equipment, retain their records within a property accountability system. Task Force Jesup found some success from reviewing records within various automated property accountability systems.

Once the U.S. military fully withdraws from Afghanistan, its accountability mission will not end. The DoD and U.S. taxpayers will want to know the final disposition of all military equipment that transited into and out of Afghanistan. When Mosul fell to the Islamic State of Iraq and Syria (ISIS) in 2015, many media reports questioned whether ISIS subsequently obtained U.S.-funded equipment from the retreating Iraqi Security Forces. The lack of complete accountability records of equipment turned over to the Iraqi Security Forces made it impossible for the DoD to know for certain. The commands responsible for U.S.-funded equipment...

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equipment must maintain these records to ensure full accountability of equipment transferred to the Afghan National Defense and Security Forces, disposed of, or retrograded out of Afghanistan.

**Previous Efforts to Maintain Personnel Records in a Contingency Environment**

Poor recordkeeping from previous contingency operations resulted in missing personnel records, which left U.S. military and civilians in a precarious spot concerning benefits such as benefits that may be available to provide services to personnel exposed to toxins or suffering from Post-Traumatic Stress Disorder (PTSD) as the result of deployment to a contingency environment. Missing records during Operation Desert Storm resulted in the Army spending millions of dollars for record reconstruction. This record reconstruction was to identify unit and individual locations at specific times during the conflict. The information was used to adjudicate claims by deployed Soldiers and to try to determine the cause of the Gulf War Syndrome. In order to prevent a similar situation upon the withdrawal from Afghanistan, the DoD needs to ensure that personnel records are maintained so that U.S. military and civilians are able to access benefits that may result from exposure to toxins such as burn pits or experiencing events linked to PTSD.

**Burn Pit and Other Toxins Exposure**

A burn pit is an area that is devoted to open-air combustion of trash. The use of burn pits was a common waste disposal practice at military sites outside the United States, such as Iraq and Afghanistan. Smoke from these pits contained substances that may have short-term and long-term health effects, especially for those who were exposed for long periods or those more prone to illness, such as individuals with pre-existing asthma or other lung or heart conditions.

The Army Center of Military History declared Operation Desert Storm as a “records disaster.” The Army did not collect or preserve any records. From 1993 through 1994, U.S. military personnel became sick with what is now referred to as the Gulf War Syndrome; however, there were no records at the time to validate their claims.

Poor recordkeeping continued during Operation Iraqi Freedom. A 2006 SIGIR report documented that the U.S. Government experienced shortcomings in accounting for personnel deployed to Iraq, especially civilians and contractors. For example, there was a lack of effective control procedures at many entry and exit points in Iraq. DoD military, civilian, and contract personnel often arrived and departed with no systemic tracking of their whereabouts or activities, or in some cases, with no knowledge of their presence in country.

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In addition, the Army lost a large portion of its field records. Not only does the Army not have a complete history of what happened in the early years of the Iraq conflict, Soldiers had difficulty proving that they were even there. Without the field records, the Army, Soldiers, and the Department of Veterans Affairs experienced increased challenges in documenting what occurred and determining proper benefits. The poor recordkeeping has continued. For example, a March 2020 DoD OIG report determined that U.S. and Coalition personnel may have been exposed to potential long-term health effects from burn pit smoke at Camp Taji, Iraq. 21 This report also documented that the Army did not accurately record the camp population on a daily basis. As a result, the Army may not be able to identify all personnel exposed to the toxins, and U.S. military personnel may not be able to access potential benefits and available resources if they are diagnosed with medical conditions related to burn pit exposure.

**Post-Traumatic Stress Disorder**

PTSD is a psychiatric disorder that results from the experience or witnessing of traumatic or life-threatening events, which can impair the person's daily life; this includes depression, substance abuse, sleep behavior, and an impairment to function in social or family life. According to the National Institutes of Health, about 30 percent of the men and women who spent time in war zones experienced PTSD.22

In many cases, U.S. military personnel attempt to seek treatment for PTSD several years after returning from combat zones. In order to determine the eligibility of U.S. military personnel for Veterans Affairs PTSD disability benefits, Veterans Affairs officials need accurate records of whether those individuals served in combat zones. As previously mentioned, poor recordkeeping from previous contingency operations, including Operations Desert Storm and Iraqi Freedom, resulted in U.S. military personnel having difficulty proving that they served in either operation.

**Conclusion**

The lessons from past oversight of contingency operations should be used to ensure better controls during the ongoing withdrawal from Afghanistan. Insufficient practices related to the handling of equipment containing sensitive information, identified in past oversight work, increased the risk of theft or compromise of the information maintained on that equipment. Responsible personnel did not ensure that controlled inventory items with hard drives were wiped before accepting the equipment from the unit. For example, units did not clear the sensitive data from four navigation systems and a counter radio-controlled improvised explosive device system.

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Poor recordkeeping in past contingency operations resulted in the loss of billions of dollars in equipment and challenges with determining Veterans Affairs benefits for U.S. military personnel. The proper retention of records associated with the U.S. military effort in Afghanistan is critical. For example, maintaining control of all associated documentation will decrease the risk of equipment loss, facilitate equipment re-use, and keep sensitive equipment, including weapons and vehicles, out of the hands of our enemies. In addition, commands will have the ability to review all available documentation associated with the disposition of equipment to determine whether all decisions were properly justified and develop lessons learned based upon those decisions to apply to future contingency operations. Records are also critical to help the DoD determine the short-term and long-term effects of exposure to toxins on U.S. military, civilian, and contractor personnel and ensure that U.S. military personnel and civilians suffering from PTSD after returning from a combat zone are able to access benefits and receive the proper treatment.

Previous reports by the GAO, DoD OIG, SIGAR, and SIGIR identified weaknesses with the DoD's handling and retention of records. The weaknesses previously reported provide an opportunity to improve records retention by applying lessons learned from past efforts in both Iraq and Afghanistan. DoD and Service-level guidance provides procedures for the retention of all records from Afghanistan. This management advisory can serve as a reference for personnel overseeing records retention in Afghanistan and future contingency operations.
Appendix

Scope and Methodology

We reviewed DoD, DHA, combatant command, Department of the Army, and Department of the Air Force criteria applicable to records retention and proper handling of equipment containing sensitive information. In addition, we analyzed nine reports issued by the GAO, DoD OIG, SIGAR, and SIGIR between 2003 and 2020 that reviewed the handling of sensitive information as it relates to the disposition process and records retention. From these reports, we identified weaknesses related to the proper handling of sensitive information from medical equipment and administrative requirements to retain equipment and personnel records. Using these weaknesses, we highlighted applicable criteria and lessons learned for personnel overseeing and conducting disposition activities in Afghanistan and future contingency operations. The nine GAO, DoD OIG, SIGAR, and SIGIR reports we reviewed are listed below.

**GAO**


**DoD OIG**


**SIGAR**


**SIGIR**

## Acronyms and Abbreviations

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<td>DHA</td>
<td>Defense Health Agency</td>
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<td>Defense Logistics Agency</td>
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<td>GAO</td>
<td>Government Accountability Office</td>
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<td>ISIS</td>
<td>Islamic State of Iraq and Syria</td>
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<td>JTF</td>
<td>Joint Task Force</td>
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<td>MTF</td>
<td>U.S. Military Medical Treatment Facility</td>
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<td>PTSD</td>
<td>Post-Traumatic Stress Disorder</td>
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<td>SIGAR</td>
<td>Special Inspector General for Afghanistan</td>
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