Results in Brief


September 28, 2018

Objective

We conducted this followup evaluation to determine whether U.S. Forces–Afghanistan (USFOR–A) implemented corrective action at Kandahar Airfield (KAF) in response to recommendations made in the DoD Office of Inspector General Report No. DODIG-2013-099, “Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan,” issued on July 18, 2013.

Background

For the 2013 report, we evaluated facilities located at KAF and Bagram Airfield, Afghanistan. For this followup evaluation, we evaluated only facilities at KAF. The 2013 report stated that U.S. Central Command (USCENTCOM) did not comply with Unified Facilities Criteria (UFC) and the National Fire Protection Association standards at KAF. We found hazardous conditions due to a lack of adherence to minimum electrical and fire protection systems standards as evidenced by 413 deficiencies in electrical and fire protection systems. These deficiencies posed a risk to the health and safety of DoD personnel. During our site visit to KAF between October 26, 2017, and November 2, 2017, we reevaluated some of the electrical system and fire protection system deficiencies identified in the 2013 report to determine the correction status. However, this 2017 followup evaluation focused on the programmatic changes required for systemic correction of all of the electrical and fire protection system deficiencies.

Findings

In this followup evaluation, we determined that USFOR–A provided qualified personnel for the oversight and inspection of electrical systems. We also found that USFOR–A developed a process to perform regular inspection and maintenance of electrical systems. In addition, we reevaluated 66 deficiencies from our 2013 report to determine the effectiveness of the USFOR–A processes. We determined that USFOR–A corrected 65 of the 66 reevaluated deficiencies (99 percent). As a result, we determined that USFOR–A implemented the electrical system recommendations, which reduced the risk of loss of life and property that could result from an electrical system deficiency due to fire, shock, or electrocution.

However, we determined that USFOR–A did not provide a Qualified Fire Protection Engineer to perform oversight of fire protection systems, ensure inspection and maintenance of all fire protection systems, and develop a fire protection plan for KAF. The USFOR–A Joint Engineer Directorate was unable to determine why there was not a Qualified Fire Protection Engineer at KAF. We also determined that USFOR–A used contracted services to perform some inspection and maintenance of fire protection systems at KAF. However, USFOR–A did not develop an effective process to ensure regular inspection and maintenance of engineered fire protection systems or any fire protection systems in non-density facilities.

The USFOR–A Plans Director and the KAF Department of Public Works Director told us that KAF was downsizing between 2015 and 2016, which was expected to change KAF’s enduring status and thus, it was not a priority to develop a fire protection plan. However, we determined that KAF is an enduring location and a fire protection plan is required, in accordance with Central Command Regulation 415-1, “Construction in the USCENTCOM Area of Responsibility,” July 18, 2014.

1 Engineered fire protection systems include automated fire suppression and alarm systems that connect the facility fire alarm control panels to a constantly attended location staffed with qualified operators for the receipt and processing of emergency communications. Non-density facilities are the facilities at KAF that are not included in the base operating support contract for regular operations and maintenance support.
Results in Brief

Findings (cont’d)

In addition, we reevaluated 170 fire protection deficiencies from our 2013 report to determine the effectiveness of any changes to the fire protection and maintenance process that were made since our 2013 evaluation. We determined that USFOR–A did not correct 84 of 170 reevaluated fire protection deficiencies (49 percent). Based on these findings, we concluded that USFOR–A did not implement the selected fire protection recommendations from the 2013 report, which increases the risk of loss of life and property due to fire, shock, or electrocution that could result from a fire protection system deficiency.

Recommendations

In an effort to fully correct programmatic fire protection deficiencies at KAF, we have closed fire protection system recommendations from the 2013 report and replaced them with the recommendations below that provide clarity to address the deficiencies identified during the 2013 and 2017 followup evaluation. We recommend that the USFOR–A Commander:

- ensure Qualified Fire Protection Engineers are available at KAF, as required by UFC 3-600-01, “Fire Protection Engineering for Facilities,” August 8, 2016, Incorporating Change 2 March 25, 2018, and
- ensure inspection, testing, and maintenance of all fire protection systems as required by UFC 3-600-01, and UFC 3-601-02, “Operations and Maintenance: Inspection, Testing, and Maintenance of Fire Protection Systems,” September 8, 2010, and

Management Comments and Our Response

The USFOR–A Joint Engineer (JENG) Director, responding for the USFOR–A Commander, agreed to ensure that a Qualified Fire Protection Engineer is available for the next Forward Engineer Support Team–Afghanistan. However, his plan does not ensure that a Qualified Fire Protection Engineer is available to address the magnitude of fire protection deficiencies that we identified in this evaluation. Therefore, we consider this recommendation unresolved and request additional comments in response to the final report.

In addition, the USFOR–A JENG Director agreed to ensure inspection, testing, and maintenance of all engineered fire protection systems. He further stated that the Logistics Civil Augmentation Program (LOGCAP) contractor would provide these services. However, our evaluation determined that the LOGCAP contract does not contain a requirement for the LOGCAP contractor to provide these services. Therefore, USFOR–A cannot require the LOGCAP contractor to provide these services unless the LOGCAP contract is modified. Further, the USFOR–A JENG Director stated that USFOR–A is performing an assessment of non-density facilities and transitioning facilities to the density list. However, he did not provide a plan for regular inspection and maintenance of non-density facilities during the transition period. Therefore, we consider this recommendation unresolved and request additional comments in response to the final report.

Finally, the USFOR–A JENG Director agreed to develop a fire protection plan as required by Central Command Regulation 451-1. Therefore, the recommendation is resolved, but remains open. We will close this recommendation once we verify that the fire protection plan was developed.

Please see the Recommendation Table on the next page.
**Recommendations Table**

<table>
<thead>
<tr>
<th>Management</th>
<th>Recommendations Unresolved</th>
<th>Recommendations Resolved</th>
<th>Recommendations Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commander, U.S. Forces–Afghanistan</td>
<td>B.1, B.2.a, and B.2.b</td>
<td>B.3</td>
<td>None</td>
</tr>
</tbody>
</table>

Please provide Management Comments by November 30, 2018.

**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.
MEMORANDUM FOR COMMANDER, U.S. CENTRAL COMMAND
COMMANDER, U.S FORCES–AFGHANISTAN
INSPECTOR GENERAL DEPARTMENT OF THE ARMY


We are providing this report for review and comment. We conducted this evaluation in accordance with the “Quality Standards for Inspections and Evaluations,” published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency.

We considered management comments on a draft of this report when preparing the final report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Comments from the USFOR–A Commander partially addressed Recommendations B.1, B.2.a, and B.2.b; therefore, we request that the USFOR–A Commander provide additional comments by November 30, 2018.

Please send a PDF file containing your comments to po-tad@dodig.mil. Copies of your comments must have the actual signature of the authorizing official for your organization. We cannot accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

If you have any questions or would like to meet to discuss the evaluation, please contact Mr. Timothy Lamb, at (703) 604-9150 or timothy.lamb@dodig.mil. We appreciate the cooperation and assistance received during this followup evaluation.

Randolph R. Stone
Deputy Inspector General
Policy and Oversight
# Contents

## Introduction

Objective ........................................................................................................................................................................................................................... 1  
Background ................................................................................................................................................................................................................... 1  

## Finding A. USFOR–A Provided Qualified Personnel and Performed Inspection and Maintenance of Electrical Systems as Recommended

USFOR–A Provided Qualified Personnel for Oversight and Inspection of Electrical Systems .................................................................................................................. 7  
USFOR–A Established Provisions for Regular Inspection and Maintenance of Electrical Systems at KAF .................................................................................................................................................................................... 8  
Conclusion ................................................................................................................................................................................................................... 10  


USFOR–A Did Not Ensure There Were Qualified Fire Protection Resources at KAF ........................................................................................................................................................................................................ 12  
USFOR–A Did Not Ensure Routine Inspection and Maintenance of Fire Protection Systems at KAF ........................................................................................................................................................................................................ 13  
USFOR–A Did Not Implement a Fire Protection Plan ........................................................................................................................................................................................................ 15  
Conclusion ................................................................................................................................................................................................................... 16  
Recommendations, Management Comments, and Our Response ........................................................................................................................................................................................................ 17  

## Appendix

Scope and Methodology .............................................................................................................................................................................. 21  
Use of Computer-Processed Data ........................................................................................................................................................................ 21  
Use of Technical Assistance ........................................................................................................................................................................................................ 21  
Prior Coverage ................................................................................................................................................................................................................... 21  

## Management Comments

U.S. Forces–Afghanistan ........................................................................................................................................................................................................ 24  

## Acronyms and Abbreviations


Introduction

Objective

We conducted this followup evaluation to determine whether United States Forces Afghanistan (USFOR–A), on behalf of U.S. Central Command (USCENTCOM), implemented corrective actions at Kandahar Airfield (KAF) in response to the DoD Office of Inspector General (DoD OIG) Report No. DODIG-2013-099, "Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan," issued on July 18, 2013. We conducted this evaluation in support of overseas contingency operation FREEDOM’S SENTINEL. See the Appendix for our scope, methodology, and prior coverage.

Background

Kandahar Airfield, Afghanistan

KAF is a U.S. military installation located in the Kandahar province in southern Afghanistan, 10 miles southeast of Kandahar City (Figure 1). Its purpose is to support U.S. military operations in Afghanistan.

Figure 1. Map of Afghanistan

Source: www.bing.com image.
Electrical and Fire Protection Systems Evaluation

The DoD OIG regards the health and safety of DoD personnel as a priority. We have performed evaluations of U. S. military–occupied facilities in Southwest Asia, Asia, Africa, the Middle East, and the United States where we evaluated electrical and fire protection systems to verify compliance with DoD health and safety policies and standards.

USFOR–A

USFOR–A is a subordinate unified command of USCENTCOM that requires logistical and sustainment services for deployed forces in Afghanistan including base support services for electrical and fire protection systems. USFOR–A uses contracts for the inspection and maintenance of electrical systems and some of the fire protection systems at KAF. For this evaluation, we used the DoD policies and standards that were included in the Logistics Civil Augmentation Program (LOGCAP) contract and Task Force Protect Our Warfighter and Electrical Resources (TF POWER) contract.

LOGCAP Contract

LOGCAP is an Army program, established in 1992, which uses contractors to provide logistical and sustainment services to deployed forces. The LOGCAP contract, W52P1J-07-D-007, Task Order 0004, hereafter referred to as the “LOGCAP contract,” provides base life support services for U.S. and coalition forces at KAF. The services provided in this LOGCAP contract include the inspection and maintenance of electrical and some fire protection systems. Specifically, the LOGCAP contractor is required to provide operations and maintenance services and establish a preventive maintenance program to maximize the life expectancy of base camp facilities on the “density list.” The LOGCAP contract performance criteria include the National Fire Protection Association (NFPA) standards, Unified Facilities Criteria (UFC), and Army Regulation (AR)-420-1, “Army Facilities Management,” April 2, 2009.

TF POWER

TF POWER is an entity composed of both Government and contract personnel who report to USFOR–A Joint Engineer (JENG) Directorate. Contract W912DY-18-F-0025 refers to the contract portion of the entity and is hereafter referred to as the “TF POWER contract.” The TF POWER contract augments the LOGCAP contract and
requires that TF POWER personnel inspect and repair electrical hazards affecting life, health, and safety for low voltage electrical power systems throughout Afghanistan. Further, the TF POWER entity provides:

- electrical safety inspection and repair of U.S. military occupied facilities located in the Combined Joint Operations Area–Afghanistan,
- Authority Having Jurisdiction oversight, and
- policies and guidance on electrical safety issues in order to prevent fires, electrical shocks, and deaths in Afghanistan.4

According to the “Task Force POWER Electrical Safety Operations Manual,” March 18, 2013, TF POWER is the overarching authority on electrical issues for DoD facilities in Afghanistan. Further, the manual states that TF POWER’s inspection and repair program eliminates existing electrical life, health, and safety issues as well as ensures new-construction meets applicable electric codes. The manual also states that TF POWER will provide oversight of all electrical systems at KAF, including the facilities on the density list maintained under the LOGCAP contract. Finally, the manual states, TF POWER provides electrical inspection and repairs for “non-density” facilities because the bulk of life, health, and safety deficiencies exist in these unmaintained facilities.5


**DoD OIG Audit Found that Government Oversight of the LOGCAP Contract Was Not Effective**

The DoD OIG conducted a separate audit and issued Report No. DODIG-2018-119, “DoD Oversight of Logistics Civil Augmentation Program in Afghanistan Invoice Review and Payment,” May 11, 2018. The objective of this audit was to determine whether the DoD adequately monitored contractor performance for services provided under the LOGCAP contract.

The Army Materiel Command is responsible for ensuring that the LOGCAP contract meets the sustainment requirements of USFOR–A. The Army Contracting Command–Afghanistan (ACC–A) is a subordinate command of the Army Materiel Command that provides contract administration services for the LOGCAP contract. The Procuring Contracting Officer delegated contract administration tasks, such

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4 Authority Having Jurisdiction is the title for an organization, office, or individual responsible for enforcing the requirements of a code or standard, or approving equipment materials, an installation, or procedure.

5 Non-density facilities are the facilities that are not identified on the LOGCAP density list. Any facility maintained by LOGCAP is termed, “density,” and can be inspected by TF POWER. However, inspection of density facilities is not standard.
as quality assurance oversight, cost monitoring, and property administration to the ACC–A. The ACC–A trains the Contracting Officer’s Representatives (CORs) performing contract oversight in Afghanistan and ensures that the CORs are performing their duties. The majority of CORs for the LOGCAP contract come from two support activities, the Area Support Group-Afghanistan and the Resolute Support Sustainment Brigade.

In Report No. DODIG-2018-119, the DoD OIG determined that the ACC–A did not monitor all contract requirements. Specifically, CORs did not determine whether the contractors were fulfilling LOGCAP contract requirements to meet DoD Fire and Emergency Services Program standards. Because of this recent DoD OIG audit, we did not perform additional tests to determine whether CORs provided effective oversight of the LOGCAP contract.

**Summary of the Prior Evaluation**

In July 2013, the DoD OIG issued Report No. DODIG-2013-099, which identified deficiencies in the inspection and maintenance of electrical and fire protection systems at KAF and Bagram Airfield. The 2013 report included recommendations for both KAF and Bagram Airfield. However, this followup evaluation focused on the deficiencies at KAF. In the 2013 report, we found that electrical and fire protection systems deficiencies posed a risk to the health and safety of DoD personnel.

We selected the following recommendations from Report No. DODIG-2013-099 for this followup evaluation at KAF because implementing these recommendations required programmatic change, which could result in the correction of all electrical system and fire protection system deficiencies in the USFOR–A area of responsibility to include KAF.

**Electrical Standards (ES) Recommendations**

- **ES3.** We recommend that USFOR–A review the government oversight and inspection requirements for electrical systems and ensure that sufficient qualified resources are available and deployed to meet the requirements through the USFOR–A area of responsibility.
- **ES4.** We recommend that provision be made for regular inspection and maintenance of electrical systems.

**Fire Protection Systems (FPS) Recommendations**

- **FPS3.** We recommend that USFOR–A review the government oversight and inspection requirements for fire protection systems and ensure that sufficient qualified resources are available and deployed to meet the requirements through the USFOR–A area of responsibility.
• FPS4. We recommend that provision be made for regular inspection and maintenance of fire protection systems.

• FPS5. We recommend that the base camp master plan include a comprehensive fire protection plan.

Recommendations ES1, ES2, FPS1, and FPS2 from the 2013 report were made to identify, prioritize, and correct specific deficiencies identified in the 2013 evaluation. During our site visit to KAF between October 26, 2017, and November 2, 2017, we reevaluated some of these electrical system and fire protection system deficiencies to determine the correction status. However, this 2017 followup evaluation focused on the programmatic changes required for systemic correction of all of the electrical and fire protection system deficiencies. See the Recommendations in Finding B.
Finding A

USFOR–A Provided Qualified Personnel and Performed Inspection and Maintenance of Electrical Systems as Recommended

We determined that USFOR–A provided sufficient qualified personnel for oversight and inspection at KAF as recommended in ES3 of the 2013 report. Specifically, USFOR–A used the LOGCAP and TF POWER contracts to provide qualified personnel to perform oversight and inspection of electrical systems at KAF. In addition, USFOR–A established policy that clarified the electrical standards requirements, which further assisted the LOGCAP and TF POWER contractors in the fielding of appropriate qualified personnel.

In addition, we found that USFOR–A developed a process for regular inspection and maintenance of electrical systems as recommended in ES4 of the 2013 report. Specifically, the LOGCAP and TF POWER contracts required regular inspection and maintenance of electrical systems. TF POWER also developed the “Electrical Safety Operations Manual,” March 18, 2013, which clarified the inspection responsibilities in the LOGCAP contract and TF POWER contract. In the Electrical Safety Operations Manual, TF POWER was identified as the overarching authority on all electrical issues for DoD facilities in Afghanistan. As a result, we determined that USFOR–A effectively used the LOGCAP contract and TF POWER contract requirements, and TF POWER’s oversight authority, to ensure regular inspection and maintenance of electrical systems.

In addition, we reevaluated a sample of 66 electrical deficiencies from the 2013 report to determine the effectiveness of these new processes and found that 65 deficiencies (99 percent) were corrected.

Therefore, we determined that USFOR–A implemented recommendations ES3 and ES4, which reduced the risk of loss of life and property due to fire, shock, or electrocution.
USFOR–A Provided Qualified Personnel for Oversight and Inspection of Electrical Systems

Report No. DODIG-2013-099 included the following recommendation.

ES3. We recommend that USFOR–A review the government oversight and inspection requirements for electrical systems and ensure that sufficient qualified resources are available and deployed to meet the requirements through the USFOR–A area of responsibility.

In 2013, USFOR–A concurred with this recommendation and stated that:

USFOR–A has reviewed the oversight and inspection requirements in conjunction with the on-going planning for the basing and personnel drawdown directed by the President of the United States. The current requirement is maintain 80 electrical inspection and repair two-person teams through February 2014, and then 36 teams from February 2014 through end-of-mission in December 2014. The contract from February 2014 is still in development, and options will be included to increase the number of teams if the requirement exists. This level of resources is adequate to inspect and repair the remaining 4,469 non-enduring facilities (buildings to be vacated by US personnel prior to December 2014) to a [life, health, and safety] standard and 4,227 enduring facilities to electrical code standards.

During our 2017 followup evaluation, we determined that USFOR–A used the LOGCAP and TF POWER contract to provide qualified personnel to perform oversight and inspection of electrical systems at KAF. Specifically, the LOGCAP contract requires the LOGCAP contractor to perform inspection and maintenance services for electrical systems in facilities on the density list.

In addition, the TF POWER contract augmented the oversight, inspection, and maintenance of electrical systems provided under the LOGCAP contract. Specifically, ACC–A provided qualified master and journeymen electricians to TF POWER to provide oversight of all electrical systems at KAF including the facilities on the density list maintained under the LOGCAP contract. TF POWER also performed inspection and maintenance of electrical systems in non-density facilities, the facilities not identified in the LOGCAP contract, at KAF. In order to verify that USFOR–A had qualified electrical system personnel, we compared maintenance logs with the job descriptions and resumes of the LOGCAP and TF POWER contractors performing electrical system maintenance and inspection. We found that there are sufficient, qualified personnel to perform inspection and maintenance of electrical system at KAF.
We also determined that USFOR–A established Policy Letter #30.1, “Electrical Standards,” May 8, 2014. In this policy, USFOR–A clarified the electrical standards that personnel working within the USFOR–A area of responsibility should use. Because USFOR–A established this policy that clarified the standards, the LOGCAP and TF POWER contractors were able to ensure they had the appropriate personnel who were trained in the applicable standards, to comply with the standards used in the USFOR–A area of responsibility. Therefore, we determined that USCENTCOM implemented recommendation ES3.

**USFOR–A Established Provisions for Regular Inspection and Maintenance of Electrical Systems at KAF**

*Report No. DODIG-2013-099 included the following recommendation.*

**ES4. We recommend that provision be made for regular inspection and maintenance of electrical systems.**

In 2013, USFOR–A concurred with this recommendation and stated that:

> [t]he process by which electrical safety issues are identified and corrected is defined under USFOR–A [Fragmentary order] 10-213 and TF POWER Assessment Team Standard Operating Procedure Memo, 26 Nov 2011. “Density list” facilities covered under the LOGCAP maintenance contract receive recurring operations and maintenance, to include inspection and repair of electrical systems. [:Defense Contract Management Agency:] funds and manages six two-person teams that focus solely on LOGCAP oversight of electrical systems. Non-density list facilities are inspected by TF POWER on a 20-month cycle, or more frequently when requested by Regional Command Engineers and Garrison Commanders. TF POWER is diligently working towards bringing 4,227 facilities into code compliance in order to bring them onto the LOGCAP maintenance contracts, whereby they will receive the necessary recurring operations and maintenance support. This will ensure all facilities expected to be occupied by US personnel after December 2014 meet application US (60 [hertz] system) or British (50 [hertz] system) Code and are eligible for operations and maintenance support via LOGCAP contracts.

During our 2017 followup evaluation, we determined that the LOGCAP and TF POWER contracts included requirements to perform regular inspection and maintenance of electrical systems. Specifically, according to the LOGCAP contract, the LOGCAP contractor is required to perform quarterly and general facility inspections for all density facilities.
In addition, according to the TF POWER contract, the TF POWER contractor is responsible for inspection, update, and repair of electrical systems in U.S. occupied infrastructure, buildings, structures, and facilities in the USFOR–A area of responsibility. The TF POWER contractor is required to provide weekly status reports which identify the number of facilities inspected and updates on each reported life, health, and safety issue.

TF POWER developed the Electrical Safety Operations Manual, which clarified the LOGCAP and TF POWER contractor's inspection responsibilities. Specifically, the Electrical Safety Operations Manual states that while TF POWER's focus should be on non-density facilities, TF POWER can inspect the density facilities maintained by the LOGCAP contractor. In the Electrical Safety Operations Manual, TF POWER was also identified as the overarching authority on all electrical issues for DoD facilities in Afghanistan.

We reviewed LOGCAP facility inspection reports and determined that the LOGCAP contractor inspected the facilities on the density lists as required in the LOGCAP contract. We also reviewed a weekly TF POWER report dated May 21, 2018, as an example of the inspection that TF POWER performed. This weekly report identified the status of TF POWER activities for enabling readiness across all Afghanistan.

To determine the effectiveness of these new processes, we reevaluated 66 electrical deficiencies identified in our 2013 report. We determined that USFOR–A corrected 65 of the 66 electrical deficiencies that we reevaluated. For example, we reevaluated the following deficiencies from our 2013 report and found them to be corrected.

**Properly Grounded Hot Water Heaters in Buildings 5868, 5816, and 241.** During our 2013 evaluation, we found hot water heaters in Buildings 5868, 5816, and 241 that were not properly grounded. If the electrical panel and the hot water tank are not both properly grounded, then the electrical panel or tank may inadvertently become energized, which increases the risk of shock or electrocution. During our 2017 evaluation, we observed the electrical panels and water tanks in Buildings 5868, 5816, and 241. We determined that the panels and tanks were properly grounded. Therefore, these deficiencies were corrected.

**Properly Wired Electrical Equipment in Building 157A.** During our 2013 evaluation, we found electrical equipment in Building 157A that was wired to junction boxes without a means of electrical disconnection. The inability to disconnect electrical equipment from its power source while performing maintenance or repairs increases the risk of shock or electrocution. During our
2017 evaluation, we observed the electrical equipment in Building 157A and determined that it had means by which it could be disconnected. Therefore, these deficiencies were corrected.

We determined that, as a result of the LOGCAP and TF POWER contract requirements and TF POWER's oversight authority, USFOR–A performed inspection and maintenance of electrical systems, and took action to address previously identified deficiencies. Therefore, we determined that USFOR–A implemented recommendation ES4.

**Conclusion**

USFOR–A used the LOGCAP and TF POWER contracts to provide qualified personnel to perform oversight and inspection of electrical systems at KAF. LOGCAP and TF POWER contractors performed inspection and maintenance of electrical systems. As a result, we determined that USCENTCOM implemented recommendations ES3 and ES4. This resulted in the correction of 65 of 66 electrical system deficiencies from our 2013 report that we reevaluated and reduced the risk of loss of life and property due to fire, shock, or electrocution that could result from an electrical system hazard.
Finding B


We found that USFOR–A did not provide sufficient qualified personnel for oversight and inspection of fire protection systems as KAF as recommended in FPS3 of the 2013 report. Specifically, USFOR–A contracted the services of fire inspection technicians to perform inspection and maintenance of fire protection systems at KAF. However, USFOR–A did not provide a Qualified Fire Protection Engineer to perform the oversight of fire protection systems at KAF. USFOR–A JENG stated that USFOR–A did not require any of the contracting agencies to acquire the services of a Qualified Fire Protection Engineer. When asked, USFOR–A JENG, responding on behalf of USFOR–A, was unable to determine why the contracting agencies had not been required to acquire the services of a Qualified Fire Protection Engineer.

We also determined that USFOR–A did not ensure regular inspection and maintenance of all fire protection systems. Although USFOR–A used the LOGCAP contract to perform some fire protection inspection and maintenance, USFOR–A did not establish a process for regular inspection and maintenance of engineered fire protection systems.6 In addition, USFOR–A did not establish a process for regular inspection and maintenance of fire protection systems in non-density facilities.7

In addition, we determined that USFOR–A did not develop a fire protection plan. The USFOR–A Plans Director and the Department of Public Works Director told us that KAF was downsizing between 2015 and 2016, which was expected to change KAF’s enduring status and thus, it was not priority to develop a fire protection plan. However, we determined that KAF is an enduring location because the DoD intends to maintain access to KAF and use it for the foreseeable future.8 Therefore, a fire protection plan is required.

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6 Engineered fire protection systems include automated fire suppression and alarm systems that connect the facility fire alarm control panels to a constantly attended location staffed with qualified operators for the receipt and processing of emergency communications.

7 Non-density facilities are the facilities that are not identified on the LOGCAP density list. Any facility maintained by LOGCAP is termed, “density,” and can be inspected by TF POWER. However, inspection of density facilities is not standard.

8 An enduring location is a location that the DoD intends to maintain access to and use of for the foreseeable future.
We also reevaluated 170 fire protection deficiencies from our 2013 report to determine the effectiveness of any changes to the fire protection inspection and maintenance process that were made since our 2013 evaluation. We determined that USFOR–A did not correct 84 of 170 fire protection deficiencies (49 percent) that we reevaluated. Therefore, we determined that USFOR–A did not develop an effective process to ensure regular inspection and maintenance of all fire protections systems at KAF. As a result, we determined that USFOR–A did not implement recommendations FPS3, FPS4, or FPS5, which increases the risk of loss of life and property due to fire hazards.

**USFOR–A Did Not Ensure There Were Qualified Fire Protection Resources at KAF**

*Report No. DODIG-2013-099 recommended the following.*

**FPS3.** *We recommend that USFOR–A review the government oversight and inspection requirements for fire protection systems and ensure that sufficient qualified resources are available and deployed to meet the requirements through the USFOR–A area of responsibility.*

In 2013, USFOR–A concurred with recommendation FPS3 and stated that:

> USFOR–A has contracted services from certified fire protection engineers who provide the requisite technical expertise with fire alarm and suppression systems in theater. Any deviations from fire safety standards continue to be addressed in coordination with USCENTCOM Engineer Division.

During our 2017 followup evaluation, we determined that USFOR–A contracted the services of fire inspection technicians to perform some inspection and maintenance of fire protection systems at KAF. However, we also determined that USFOR–A did not contract for the services of a Qualified Fire Protection Engineer to perform the oversight of fire protection systems at KAF. According to the UFC 3-600-01, “Fire Protection Engineering for Facilities,” August 8, 2016, Incorporating Change 2 March 25, 2018, a Qualified Fire Protection Engineer should be a Professional Engineer that is involved in the modification of fire rated construction, fire detection, fire suppression, or life safety systems.

We asked USFOR–A, why it did not provide a Qualified Fire Protection Engineer. USFOR–A JENG, responding on behalf of USFOR–A, told us that it requested a records search from ACC–A, Operational Contract Support Integration Cell, LOGCAP, and the Combined Joint Operations Area Afghanistan service providers. These agencies conducted a records search back to 2013 regarding the agreed-upon action to contract for the services of Qualified Fire Protection Engineers. According to
the USFOR–A JENG, none of these agencies established or were required to contract services for these Professional Engineers. As a result, we determined the USFOR–A did not implement recommendation FPS3.

**USFOR–A Did Not Ensure Routine Inspection and Maintenance of Fire Protection Systems at KAF**

*Report No. DODIG-2013-099 recommended the following.*

**FPS4.** We recommend that provision be made for regular inspection and maintenance of fire protection systems.

In 2013, USFOR–A concurred with recommendation FPS4 and stated that:

> [f]ollowing the DoD IG inspection, USFOR–A implemented an aggressive plan to evaluate facilities in theater to assess their current compliance with fire safety standards. Once the assessment is complete, USFOR–A will address any deviations identified and codify a schedule to ensure routine inspections and maintenance is conducted. USCENTCOM Engineer Division continues to coordinate with USFOR–A in this effort.

During our 2017 followup evaluation, we determined that the LOGCAP contractor performed some inspection and maintenance of facilities on the density list. According to the “USFOR–A Fire Prevention Standard Operating Procedure,” September 1, 2016, the LOGCAP contractor is responsible for the maintenance of fire protection systems. The LOGCAP contract states,

> [t]he Contractor shall provide fire protection services and training. The Contractor shall conduct fire inspections, provide fire extinguishers, smoke detectors, carbon monoxide detectors and lighted exit signs. Inspection frequency and fire prevention summaries shall be conducted [in accordance with] [Army Regulation] 420-1, Army Facilities Management, Chapter 25, Fire and Emergency.

We obtained and reviewed LOGCAP fire protection inspection reports and determined that the LOGCAP contractor inspected some pre-engineered fire protection systems, such as portable fire extinguishers and commercial kitchen hood systems. However, it did not inspect engineered fire protection systems.9

9 Engineered fire suppression systems include: automatic sprinkler systems, water spray systems, foam systems, standpipe systems, dry chemical extinguishing systems, wet chemical extinguishing systems, clean agent fire extinguishing systems, water mist fire protection systems, carbon dioxide systems, and halon 1301 systems. Engineered fire protection systems are more complicated than pre-engineered fire protection systems and include automated fire suppression and alarm systems that connect the facility fire alarm control panel(s) to a constantly attended location staffed with qualified operators for the receipt and processing of emergency communications.
Engineered fire protection systems were not included in regular inspection and maintenance because USFOR–A did not include a requirement in the LOGCAP contract for the inspection, testing, and maintenance of engineered fire protection systems, as required by UFC 3-601-02, “Operations and Maintenance: Inspection, Testing, and Maintenance of Fire Protection Systems,” September 8, 2010. As a result, we determined that USFOR–A did not implement an effective process to ensure regular inspection and maintenance of engineered fire protection systems.

We also determined that USFOR–A did not ensure regular inspection and maintenance of any fire protection systems in non-density facilities. According to the “USFOR–A Fire Prevention Standard Operating Procedure,” the LOGCAP contractor is responsible for inspection, testing, repair, and maintenance of fire protection systems. “USFOR–A Fire Prevention Standard Operating Procedure,” does not differentiate responsibilities for density and non-density facilities. However, according to the LOGCAP contract, the LOGCAP contractor is only responsible for the inspection, maintenance, and repair of fire protection systems in density facilities. As a result, we determined that USFOR–A did not implement an effective process to perform regular inspection and maintenance of fire protection systems in non-density facilities.

In addition, we reevaluated 170 fire protection deficiencies from our 2013 report to determine the effectiveness of any changes to the fire protection inspection and maintenance process that were made since our 2013 evaluation. We determined that USFOR–A did not correct 84 of the 170 fire protection deficiencies (49 percent) that we reevaluated. For example, we reevaluated the following deficiencies and determined that they were not corrected.

**Nonfunctional Fire Alarm Systems in Dormitory Buildings 543, 543A, and 543B.**
During our 2013 evaluation, we found the power was disconnected to the fire alarm systems in all three buildings rendering the smoke detectors, strobe lights, and warning horns nonfunctional. In the event of smoke or fire a nonfunctional fire alarm system significantly increases risk of loss of life and property due to lack of timely warning. During our 2017 evaluation, we found that these deficiencies were not corrected. On March 7, 2017, the KAF Garrison Manager applied to USCENTCOM for a waiver of this safety requirement. However, the waiver was not approved at the time of our followup evaluation.

**Nonfunctional Fire Suppression Systems in 22 Aircraft Hangars at Yankee Ramp.**
During our 2013 evaluation, we found that the water pressure in the fire pump main supply line, which supplies water to all the hangers, was 0 pounds per square inch. Without water the fire pumps are unable to supply the fire suppression

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10 UFC 3-601-02 is the standard for installed fire detection and suppression system inspection requirements.
Findings

During our 2017 evaluation, we found that the water pressure was 0 pounds per square inch and this deficiency was not corrected. On March 24, 2017, the 451 Air Expeditionary Group Commander applied to USCENTCOM for a waiver of this safety requirement. However, the waiver was not approved at the time of our followup evaluation.

**Inadequate Emergency Lighting in Dormitory Buildings 156B, and 156C, “Old Kandahar Hotel.”** During our 2013 evaluation, we found stairways and exits in both buildings did not have emergency lighting. Inadequate lighting could delay or prevent exit from the building in an emergency situation. During our 2017 evaluation, we found that these deficiencies were not corrected.

We determined that USFOR–A did not ensure regular inspection and maintenance of engineered fire protection systems in density facilities or any fire protection systems in non-density facilities. Further, USFOR–A did not take action to address previously identified deficiencies. Therefore, we determined that USFOR–A did not implement recommendation FPS4.

**USFOR–A Did Not Implement a Fire Protection Plan**

**Report No. DODIG-2013-099 recommended the following.**

*FPS5. We recommend that the KAF base camp master plan include a comprehensive fire protection plan.*

In 2013, USFOR–A concurred with recommendation FPS5 and stated that:

> USFOR–A will ensure Base Camp Master Plans include a comprehensive fire prevention and protection plan, which will be developed at the base level following USFOR–A Fire Prevention and Protection Standard Operating Procedures. [Estimated completion date] for completion of all required plans [is] 1 October 2013.

During our 2017 followup evaluation, we determined that USFOR–A did not implement our recommendation that the base camp master plan include a comprehensive fire protection plan. According to Central Command Regulation 415-1, “Construction in the USCENTCOM Area of Responsibility,” July 18, 2014, an effective fire protection plan is critical to the safety of personnel, facilities, and equipment.

We determined that USFOR–A did not update the base camp master plan after our 2013 evaluation. Specifically, when we requested the base camp master plan, USFOR–A provided the August 2012 base camp master plan, which was...
developed prior to our 2013 report and does not include a fire protection plan. The Garrison Manager and LOGCAP COR confirmed that there was not a fire protection plan for KAF.

The USFOR–A Plans Director and the Department of Public Works Director told us that USFOR–A did not include a fire protection plan in the base camp master plan because KAF was downsizing between 2015 and 2016, which was expected to change KAF’s enduring status and thus, a fire protection plan was not a priority. However, we determined that KAF is an enduring location because the DoD intends to maintain access to and use of KAF for the foreseeable future. Therefore, a fire protection plan is required in accordance with Central Command Regulation 415-1.

As a result, we determined USFOR–A did not implement recommendation FPS5.

**Conclusion**

USFOR–A used LOGCAP fire protection technicians to perform inspection and maintenance of some of the fire protection systems at KAF. However, USFOR–A did not have a Qualified Fire Protection Engineer at KAF. The USFOR–A JENG was unable to determine why the USFOR–A contracting agencies did not include a requirement for a Qualified Fire Protection Engineer.

In addition, we determined that USFOR–A did not ensure regular inspection and maintenance of fire protections systems. Although USFOR–A used the LOGCAP contractor to perform some inspection and maintenance, USFOR–A did not establish a process to ensure regular inspection and maintenance of engineered fire protection systems in density facilities or any fire protection systems in non-density facilities.

We also determined that USFOR–A did not develop a fire protection plan because the USFOR–A Plans Director and the Department of Public Works Director stated that KAF was downsizing between 2015 and 2016, which was expected to change KAF’s enduring status and thus, a fire protection plan was not a priority. However, we determined that KAF is an enduring location. Therefore, a fire protection plan is required in accordance with Command Control Regulation 415-1.

We determined the changes that were made since our 2013 report to the fire protection inspection and maintenance process were not effective because we found that USFOR–A did not correct 84 of 170 fire protection deficiencies (49 percent) that we reevaluated from the 2013 report. As a result, we determined that USCENTCOM did not fully implement recommendations FPS3, FPS4, or FPS5, which increases the risk of life and property due to fire hazards. In an effort to fully correct programmatic fire protection deficiencies at KAF, we
have closed recommendations FPS3, FPS4, and FPS5 and replaced them with the recommendations below that address the deficiencies identified during this 2017 followup evaluation.

**Recommendations, Management Comments, and Our Response**

**Recommendation B.1**

We recommend that the U.S. Forces–Afghanistan Commander ensure that Qualified Fire Protection Engineers are available in the U.S. Forces–Afghanistan area of responsibility to perform oversight of fire protections systems, as required by Unified Facilities Criteria 3-600-01.

**U.S. Forces–Afghanistan Comments**

The USFOR–A Joint Engineer Director, responding for the USFOR–A Commander, agreed, stating that the USFOR–A Joint Engineer is attempting to add a fire protection engineer to the next rotation of the Forward Engineer Support Team–Afghanistan. He further explained that the Forward Engineer Support Team–Afghanistan is a US Army Corps of Engineers team of military and civilian engineers that reports to the USFOR–A JENG and can be tasked to develop engineering designs or perform site analysis. In addition, the USFOR–A Joint Engineer Director stated that the Area Support Group has a civilian Installation Fire Chief that provides support to both the installation and USFOR–A JENG.

**Our Response**

Comments from the USFOR–A JENG Director partially addressed the recommendation; therefore, the recommendation is unresolved. We agree with the USFOR–A JENG Director’s plan to add a fire protection engineer to the rotation of the Forward Engineer Support Team–Afghanistan. However, we disagree that this plan will ensure that a Qualified Fire Protection Engineer is available to address the magnitude of fire protection deficiencies that we identified in this evaluation.

We request that the USFOR–A Commander indicate how he will ensure that Qualified Fire Protection Engineers are available in the U.S. Forces–Afghanistan area of responsibility if unable to add a Qualified Fire Protection Engineer to the next rotation of the Forward Engineer Support Team–Afghanistan. In addition, we request that the Commander indicate how he will ensure that Qualified Fire Protection Engineers are available in the U.S. Forces–Afghanistan area of responsibility at the completion of the Forward Engineer Support Team–Afghanistan rotation.
**Recommendation B.2**

We recommend that the U.S. Forces–Afghanistan Commander ensure inspection, testing, and maintenance of:

a. Engineered fire protection systems in density facilities, in accordance with Unified Facilities Criteria 3-601-02.

**U.S. Forces–Afghanistan Comments**

The USFOR–A JENG Director, responding for the USFOR–A Commander, agreed, stating that the LOGCAP contractor, DynCorp International, currently has fire alarm technicians and fire sprinkler technicians on site performing testing, maintenance and inspections. According to the USFOR–A JENG Director, if the services of a Qualified Fire Protection Engineer are required, then the LOGCAP contractor, DynCorp International, should retain the services of the subcontractor, Planate Management Group, to provide those engineering services.

**Our Response**

Comments from the USFOR–A JENG Director, partially addressed the recommendations; therefore, the recommendation is unresolved. We agree that the LOGCAP contractor, DynCorp International, had fire alarm technicians and fire sprinkler technicians that performed testing, maintenance, and inspections of fire protection systems such as portable fire extinguishers and commercial kitchen hoods. However, the LOGCAP contract did not require regular inspection and maintenance of engineered fire protection and suppression systems such as automatic fire alarm and sprinkler systems. These engineered fire protection systems are more complicated than stand-alone fire extinguisher systems and smoke alarms, and as a result, require inspection, testing, and maintenance in accordance with UFC 3-601-02.

As identified in this finding, the LOGCAP contract does not include a requirement for the LOGCAP contractor to perform inspection, testing, and maintenance of engineered fire protection systems in accordance with UFC 3-601-02. Therefore, USFOR–A cannot require the LOGCAP contractor to provide regular inspection, testing, and maintenance of engineered fire protection systems unless a modification is made to the LOGCAP contract. In addition, USFOR–A did not include the services of a Qualified Fire Protection Engineer in the contract. Therefore, USFOR–A cannot require the LOGCAP contractor to subcontract for a Qualified Fire Protection Engineer unless a modification is made to the LOGCAP contract. Ultimately, USFOR–A is responsible for ensuring regular maintenance and inspection of engineered fire protection systems.
We request that the USFOR–A Commander establish and describe the process for regular inspection and maintenance of pre-engineered and engineered fire protection systems in density facilities.

b. All fire protection systems in non-density facilities, in accordance with Unified Facilities Criteria 3-600-01 and Unified Facilities Criteria 3-601-02.

U.S. Forces–Afghanistan Comments

The USFOR–A JENG Director, responding for the USFOR–A Commander, agreed, stating that the LOGCAP contractor’s Facilities Management Group tracks, schedules, and documents facility testing, maintenance, and inspections. In addition, report data is readily available in the Master Schedule of Work. Further, the USFOR–A JENG Director stated that non-density facilities are undergoing an assessment to determine whether the facility is required for KAF’s enduring mission. If the facility is determined to be required for KAF’s enduring mission, then it will be recommended that the facility have a complete inspection to include testing, maintenance, and inspection of the fire protection systems. Upon completion of repairs, the facility will be added to the Master Schedule of Work.

Our Response

Comments from the USFOR–A JENG Director partially addressed the recommendation; therefore, the recommendation is unresolved. Although we agree that the LOGCAP contractor tracks, schedules, and documents facility testing, maintenance, and inspection, this practice is only for facilities on the LOGCAP contract’s density list. We understand that USFOR–A is performing an assessment to determine whether non-density facilities are required for KAF’s enduring mission and then transitioning required facilities to the density list. However, he did not provide a plan for regular maintenance and inspection of non-density facilities during the transition period. The bulk of life, health, and safety deficiencies exist in the unmaintained, non-density facilities.

We request that the USFOR–A Commander provide:

1. documentation that USFOR–A has established a process for regular inspection and maintenance of all fire protection systems in non-density facilities during the transition period,
2. a plan that identifies each non-density facility and its expected date of assessment,
3. documentation that regular inspection and maintenance of non-density facilities has occurred, and
4. the results of the non-density facility assessments, to include which facilities have been added to the density list.
**Recommendation B.3**

We recommend that the U.S. Forces–Afghanistan Commander develop a fire protection plan unique to Kandahar Airfield, as required by Central Command Regulation 415-1.

**U.S. Forces–Afghanistan Comments**

The USFOR–A JENG Director, responding for the USFOR–A Commander, agreed, stating that the Area Support Group at KAF is developing a fire protection plan as required by Central Command Regulation 415-1.

**Our Response**

Comments from the USFOR–A Joint Engineer addressed all specifics of the recommendation, and no further comments are required. Therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we receive a copy of the KAF Fire Protection Plan that meets the requirements in Central Command Regulation 415-1.
Appendix

Scope and Methodology

We conducted this evaluation from October 26, 2017, to July 23, 2018, in accordance with the “Quality Standards for Inspections and Evaluations,” published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation to obtain sufficient appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objective.

To accomplish our objective, we:

- requested information from USFOR-A, on behalf of USCENTCOM, which included the list of facilities currently in use, the base operating support services contract, the basing master plan, the fire protection standard operating procedure, and KAF electrical and fire protection systems policies;
- selected facilities from the 2013 report to reevaluate;
- reviewed documentation to determine status of selected recommendations;
- analyzed relevant documents and conducted interviews with facilities personnel.

Use of Computer-Processed Data

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

Use of Technical Assistance

We used a master electrician and a fire protection engineer to assist in performing this evaluation.

Prior Coverage

During the last 5 years, the DoD OIG issued one report related to the government oversight of contractors in Afghanistan and several reports related to health and safety evaluations of U.S. military facilities.
Appendixes


DoD OIG determined that the ACC-A did not monitor all contract requirements. For example, CORs did not determine whether contractors were fulfilling contract requirements to meet DoD Fire and Emergency Services Program standards.


We found that indoor air quality, electrical systems, fire protection systems, and inactive fuel systems were not being maintained in accordance with DoD health and safety policies and standards. However, we found that the active fuel systems at Al Udeid Air Base were generally maintained in accordance with DoD health and safety policies and standards.


In our 2014 report, we discussed our inspection of 15 military housing facilities in Japan, where we identified 1,057 deficiencies in fire protection, electrical systems, environmental health and safety, and housing management, which posed a risk to the health, safety, and well-being of warfighters and their families. Our prior report made various recommendations for corrective action. In this followup evaluation, we determined that the Military Departments had partially implemented the recommendations from our prior report.


In our 2014 report, we discussed our inspection of 13 military installations in the Republic of Korea, where we identified 646 deficiencies for fire protection, electrical systems, environmental health and safety, and housing management, which posed a risk to the health, safety, and well-being of warfighters and their families. Our prior report made various recommendations for corrective action. In this followup evaluation, we determined that the Army and Air Force had partially implemented the recommendations from our prior report.


Management Comments

U.S. Forces–Afghanistan

MEMORANDUM FOR USCENTCOM-IG

3 September 2018


1. PURPOSE: This memorandum contains a status report on actions requested for compliance with Fire Protection and Electrical Standards of U.S. Controlled and Occupied Facilities in Afghanistan as requested by DOD IG in the memorandum dated 11 Feb 2018

2. Fire Protection Standards Update:

a. Information requested: Please provide a response to Recommendation B.1. We recommend that the U.S. Forces – Afghanistan Commander ensure that Qualified Fire Protection Engineers are available in the U.S. Forces-Afghanistan area of responsibility to perform oversight of fire protections systems, as required by Unified Facilities Criteria 3-600-01.

   (1) USFOR-A JENG is attempting to add a Fire Protection Engineer to the next rotation of the Forward Engineer Support Team – Afghanistan (FEST-A). The FEST-A is a USACE team of military and civilian engineers that reports to the USFOR-A JENG and can be tasked to develop engineering designs or perform site analysis. Additionally, the Area Support Group (ASG) has a current civilian Installation Fire Chief that is providing support to both the installation and USFOR-A JENG directorate.

b. Information requested: Please provide a response to Recommendation B.2. We recommend that the U.S. Forces – Afghanistan Commander ensure inspection, testing, and maintenance of engineered fire protection systems in density and non-density facilities, in accordance with Unified Facilities Criteria 3-601-02.

   (1) The Performance Contractor, DynCorp Intl. currently has Fire Alarm Technicians and Fire Sprinkler Technicians on site performing Testing, Maintenance and Inspections (TMI). If the services of a Qualified Fire Protection Engineer (QFPE) are required, then DynCorp Intl. should retain the services of Planate Management Group to provide those engineering services.

   (2) Testing, Maintenance and Inspections (TMI) is tracked, scheduled and documented by DynCorp’s Facilities Management Group. Report data is readily
USFOR-A-JENG

SUBJECT: DOD IG update to 9 August 2018 Follow-up on DoD OIG Report No. DODIG-2013-099, “Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan,” July 18, 2013 at Kandahar Airfield reviewable in CDRL A0002 master Schedule of Work. Non-density facilities are currently undergoing an assessment to determine if the facility is required for KAF’s enduring mission. If the facility is determined to be required as part of KAF Enduring plan, then it will be recommended for a complete inspection to include TMI of fire systems. Upon completion of repairs, it will be added to the MSOW.

(c) Information requested: Please provide a response to Recommendation B.3. We recommend that the U.S. Forces – Afghanistan Commander develop a fire protection plan unique to Kandahar Airfield, as required by Central Command Regulation 415-1.

(1) The ASG at KAF is currently developing a fire protection plan per Central Command Regulation 415-1.

4. POC for this memorandum is USFOR-A JENG (Maj Eric Kellogg) at DSN 318-481-3439.
## Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
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<tbody>
<tr>
<td>ACC-A</td>
<td>Army Contracting Command - Afghanistan</td>
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<td>AR</td>
<td>Army Regulation</td>
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<td>COR</td>
<td>Contracting Officer’s Representative</td>
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<td>DoD OIG</td>
<td>Department of Defense Office of Inspector General</td>
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<td>ES</td>
<td>Electrical Systems</td>
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<td>FPS</td>
<td>Fire Protection Systems</td>
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<td>JENG</td>
<td>Joint Engineer</td>
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<td>KAF</td>
<td>Kandahar Airfield</td>
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<td>LOGCAP</td>
<td>Logistics Civil Augmentation Program</td>
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<td>NFPA</td>
<td>National Fire Protection Association</td>
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<td>TF POWER</td>
<td>Task Force Protect Our Warfighter and Electrical Resources</td>
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<td>Unified Facilities Criteria</td>
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<td>United States Forces–Afghanistan</td>
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