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Inspector General
United States Department of Defense

U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan

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Acronyms and Abbreviations

APS	Army Prepositioned Stock
COR	Contracting Officer's Representative
LOGCAP	Logistics Civil Augmentation Program
MILCON	Military Construction
QA	Quality Assurance
QC	Quality Control
RMS	Resident Management System
TAN	Afghanistan Engineering District-North
USACE	U.S. Army Corps of Engineers

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

November 26, 2012

MEMORANDUM FOR AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan (Report No. DODIG-2013-024)

We are providing this report for your information and use. U.S. Army Corps of Engineers, Afghanistan Engineering District-North quality assurance personnel did not properly monitor contractor performance and fulfill quality assurance responsibilities for the four military construction projects, valued at $49.6 million, that we reviewed at Bagram Airfield. We considered management comments on a draft of this report when preparing the final report.

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division comments conformed to the requirements of DoD Directive 7650.3 and left no unresolved issues.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-8905 (DSN 664-8905).

Amy J. Frontz
Principal Assistant Inspector General
for Auditing

cc:
Commander, U.S. Central Command
Commander, U.S. Forces-Afghanistan
Commander, U.S. Army Central
Commanding General, U.S. Army Corps of Engineers

Results in Brief: U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan

What We Did

This audit is one in a series of reports on military construction projects in Afghanistan. Our objective was to determine whether the U.S. Army Corps of Engineers (USACE) provided effective oversight of military construction projects at Bagram Airfield, Afghanistan. We determined whether USACE properly monitored contractor performance during construction and adequately performed quality assurance oversight responsibilities.

What We Found

USACE Afghanistan Engineering District-North (TAN) quality assurance (QA) personnel did not properly monitor contractor performance and fulfill quality assurance responsibilities for the four military construction projects reviewed at Bagram Airfield, valued at $49.6 million. Specifically, QA personnel did not: develop supplemental project QA plans; approve contractors' quality control plans before contractors began construction; maintain QA documentation of QA personnel surveillance activities; follow responsibilities in the contracting officer's designation memoranda; and request technical specialists to perform technical inspections. In addition, QA personnel relied on the Logistics Civil Augmentation Program contractor to perform infrequent technical inspections and relied on their own experience to identify construction deficiencies.

These conditions occurred because USACE TAN officials did not provide sufficient oversight of QA personnel. For example, QA personnel stated they were not aware of their responsibilities because USACE TAN officials did not provide enough guidance or training to QA personnel operating in a contingency environment. Further, QA personnel stated they were either unaware of, did not see a need for, did not have time to follow, or did not have proper personnel to follow QA guidance. As a result, USACE did not have reasonable assurance that contractors' quality control programs were effective and the four MILCON projects met or would meet contract requirements.

What We Recommend

Among other recommendations, we recommend that the Commander, USACE TAN verify that project engineers develop supplemental project QA plans and approve contractor quality control plans before contractors begin construction; direct contracting officers to verify the performance of requirements in their designation memoranda; access the availability of technical specialists and verify the use of technical specialists to support the conduct of technical inspections; and conduct training for QA personnel on QA surveillance requirements in a contingency environment.

Management Comments and Our Response

Although the Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division, disagreed with one aspect of the finding, he agreed with the recommendations, and the comments were responsive. No further comments are required.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Commander, U.S. Army Corps of Engineers Afghanistan Engineering District-North		1, 2, 3, 4, 5, and 6

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Introduction

Objective

This audit is one in a series of military construction (MILCON) projects in Afghanistan. Our overall objective was to determine whether U.S. Army Corps of Engineers (USACE) provided effective oversight of MILCON projects at Bagram Airfield, Afghanistan. Specifically, we determined whether USACE properly monitored contractor performance during construction and adequately performed quality assurance (QA) oversight responsibilities. See the Appendix for the audit scope, methodology, and prior coverage related to the audit objective.

Background

The USACE mission is to provide vital public engineering services to strengthen our Nation's security, energize the economy, and reduce risks from disasters. According to DoD Directive 4270.5, "Military Construction," February 12, 2005, USACE is the Army's construction agent for the design or construction execution responsibilities associated with MILCON program facilities, and is the lead construction agent supporting the U.S. Central Command area of responsibility, including Afghanistan. As the lead construction agent, USACE is responsible for performing oversight of MILCON contractors and conducting contract administration. USACE Afghanistan Engineering District-North (TAN), located in Kabul, Afghanistan, administers construction projects at Bagram Airfield, Afghanistan.[1]

Selection of Military Construction Projects

In January 2012, USACE TAN officials provided a list of 51 MILCON projects in Afghanistan that were assigned to them for contract administration. The projects, valued at $635.8 million, were funded for FYs 2010 and 2011. We identified 20 construction projects that were at least 40 percent completed. Of the 20 projects, five were located at Bagram Airfield. We nonstatistically selected four of the five projects, totaling approximately $49.6 million, for review. The projects selected were:

- **Project No. 71491, Army Prepositioned Stock (APS) Compound (Contract No. W912ER-10-C-0027).** The purpose of the project was to construct three storage warehouses to support tactical vehicles and a vehicle maintenance facility. The contract was awarded on April 19, 2010. Including contract modifications, the value of the project was $24.4 million. The contractor completed the APS Compound project in July 2012, 8 months beyond the planned contract completion date.

[1]USACE TAN, Bagram Area Office is responsible for conducting the oversight and QA for construction projects at Bagram Airfield.

- **Project No. 71489, Barracks, Phases 11-14 (Contract No. W912ER-10-C-0044).** The purpose of the project was to construct four concrete masonry unit barracks (phases 11-14) to provide housing for 560 military personnel. The contract was awarded on September 25, 2010. Including contract modifications, the contract was valued at $12.0 million. The project, planned for completion in May 2012, is expected to be completed in December 2012.

- **Project No. ATUH100101, Passenger Terminal (Contract No. W912ER-10-C-0028).** The purpose of the project was to construct a 3,764 square meter, two-story pre-engineered metal building. The contract was awarded on May 14, 2010. Including contract modifications, the Passenger Terminal project was valued at $8.0 million. The contractor completed the Passenger Terminal project in September 2011. However, deficiencies were identified that required the contractor to do additional work. The contractor corrected the majority of those deficiencies in February 2012. QA personnel indicated that all remaining issues were resolved, as of June 1, 2012.

- **Project No. 69398, Fuel System, Phase 6 (Contract No. W912ER-10-C-0024).** The purpose of the project was to construct a bulk fuel storage system that included a 4,164 cubic meter (1.1 million gallons) storage tank, pumps, filters, equipment, controls, and lines. The contract was awarded on March 30, 2010. Including contract modifications, the Fuel System project was valued at $5.2 million. The Fuel System project was planned for completion in June 2012. However, the contractor completed the project in October 2012.

For each of the four projects, a USACE TAN contracting officer designated Bagram Area Office QA personnel as contracting officer's representative (COR) to provide contract administration.[2]

Criteria for Quality Assurance

Federal Acquisition Regulation subpart 46.1, "Quality Assurance-General," states that Government contract QA consists of various functions and inspections performed by the Government to determine whether a contractor fulfilled the contract obligations pertaining to quality and quantity. USACE Engineer Regulation 1180-1-6, "Construction Quality Management," September 30, 1995, states that QA is the system by which the government fulfills its responsibility to be certain the contractors' quality control (QC) is functioning and the specified end product is realized.

The Afghanistan Engineer District, U.S. Army Corps of Engineers District Level Quality Assurance Plan for Construction (District-Level QA Plan) revised April 2011, states that obtaining quality construction is the responsibility of both the construction contractor and the government with the mutual goal of providing a quality product conforming to contract

[2]FAR 46.104, "Contract Administration Office Responsibilities," include developing and applying efficient procedures for performing Government contract QA actions under the contract and performing all actions necessary to verify whether the supplies or services conform to contract quality requirements.

requirements. Key QA personnel responsible for managing and executing construction contracts include:

- **Area Engineer** - manages the mission and personnel within the area of responsibility. The area engineer works through the resident engineers to properly manage projects and personnel assigned to them. The area engineer ensures that QA procedures are implemented and establishes local policy and procedures to enhance implementation of quality construction.

- **Resident Engineer** - manages the area office on behalf of the area engineer, provides guidance on the implementation of an effective QA program, and sees that the program is successfully executed. The resident engineer serves as the primary COR on most contracts. The CORs for the four MILCON projects were designated by contracting officers.

- **Project Engineer** - provides overall project management from Notice-to-Proceed to final closeout and served as the COR[3] for assigned projects. The project engineer is responsible for QA of the project, with duties that include preparing supplemental project QA plans, conducting pre-construction and weekly progress meetings, ensuring the proper management and documentation of projects,[4] and scrutinizing all payment applications.

- **Construction Representative** - works directly for the project engineer and resident engineer and serves as the "eyes and ears" on the project site. The construction representative reviews QCs and QA requirements and coordinates the technical inspections of mechanical, electrical, structural systems as required. The construction representative also prepares QA reports for inspections and documents daily construction progress.

The District-Level QA Plan provided detailed procedures and templates for QA personnel to follow in completing documentation needed to perform and support QA implementation.

Review of Internal Controls

DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses pertaining to USACE TAN. USACE TAN officials did not provide sufficient oversight of QA personnel to ensure the District-Level QA Plan for Construction and the FAR requirements were followed. We will provide a copy of the report to the senior official responsible for internal controls at USACE TAN.

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[3]Initially, the project engineers served as CORs. However, beginning in November 2011, contracting officials began designating resident engineers as CORs.
[4]These tasks are also required of the area engineer and resident engineer.

Finding. U.S. Army Corps of Engineers Afghanistan Engineering District–North Contract Oversight of Military Construction Projects Was Not Effective

USACE TAN (Bagram Area Office) QA personnel did not properly monitor contractor performance and fulfill quality assurance responsibilities for four MILCON projects reviewed at Bagram Airfield, valued at $49.6 million, as required in the Federal Acquisition Regulation and USACE guidance. Specifically, QA personnel[5] did not:

- develop supplemental project QA plans for use in performing surveillance during construction;
- approve three of the four contractor's QC plans before the contractors began construction;
- maintain required QA supporting documentation of surveillance activities performed during construction; and
- follow COR responsibilities cited in the contracting officers' designation memoranda.

Additionally, QA personnel did not arrange to have technical inspections performed of contractors' construction efforts. Instead, QA personnel relied on the Logistics Civil Augmentation Program (LOGCAP) contractor to perform infrequent inspections and relied on their own experience to identify construction deficiencies.

These conditions occurred because USACE TAN officials did not provide sufficient oversight of QA personnel. For example, QA personnel stated they were not aware of their responsibilities because USACE TAN officials did not provide enough guidance or training to QA personnel on functioning in a contingency environment. Further, QA personnel stated they were either unaware of, did not see a need for, did not have time to follow, or did not have proper personnel to follow QA guidance.

As a result, USACE did not have reasonable assurance that contractors' QC programs were effective and that the four MILCON projects reviewed met or would meet contract requirements.

Supplemental Project Quality Assurance Plans Needed to Be Developed

Project engineers did not develop supplemental project QA plans specific to their construction projects. The District-Level QA Plan states that a unique supplemental project QA plan must be produced for every construction project,[6] with consideration for factors, such as complexity,

[5]USACE TAN QA personnel consist of the area engineer, resident engineers, CORs, project engineers, and construction representatives overseeing the construction of selected projects.
[6]USACE Engineering Regulation 1180-1-6 requires QA plans to be developed during the project's planning stage.

duration, site accessibility, and security risk. At a minimum, supplemental project QA plans are to include staffing, definable features of work[7], QA surveillance responsibilities, specific QA testing to include type and frequency, and project milestone dates. Before the start of work, the definable features of work in the supplemental project QA plan must match those in the contractor's QC plan. The District-Level QA Plan provides a template for project engineers to use as a guide in creating a supplemental project QA plan.

Project engineers did not develop a supplemental project QA plan for the APS Compound, Barracks, and Passenger Terminal projects and only partially completed a supplement project QA plan for the Fuel System project. For example, the project engineer for the Fuel System project (Figure 1) provided a supplemental project QA plan that included staffing, milestone dates, and some specific QA testing. However, the supplemental project QA plan did not address definable features of work, QA surveillance responsibilities or the type and frequency of job specific QA testing. Further, the resident engineer signed the supplemental project QA plan on February 1, 2012, which was 18 months after construction began. For the Passenger Terminal project, the project engineer did not develop a supplemental project QA plan until 5 months after the project was completed.

Figure 1. Fuel System Phase 6 Project

Source: DoD OIG

This occurred because project engineers did not see a need for having a supplemental project QA plan in place. QA personnel stated they did not always have time to develop a supplemental project QA plan and that they relied on contract technical provisions and their own experience with construction to understand what needed to be done. One of the project engineers stated he was not aware of the existence of the District-Level QA Plan.

As a result of not having supplemental project QA plans, QA personnel did not have QA plans in place to ensure that their contract monitoring efforts were sufficient to verify whether the

[7]Definable feature of work is a task that is separate and distinct from other tasks and has separate control requirements. QC and QA rely on the assignment of definable features of work within a project to monitor contractor progress on construction projects.

contractors fulfilled contract obligations pertaining to quality and quantity. Also, Bagram Area Office QA personnel did not formally plan and schedule their participation in the contractors' three-phase inspection process used to verify whether supplies or services provided by the contractors complied with contractual requirements.

Project engineers not making the time to develop supplemental project QA plans and relying on their own personal experience to perform technical inspections did not provide the Government with reasonable assurance that they were adequately monitoring the progress and performance of contractors. Accordingly, project engineers should have developed supplemental project QA plans for monitoring the progress and performance of contractors to ensure outcomes were consistent with contract requirements. Therefore, the Commander, USACE TAN needs to verify that project engineers develop supplemental project QA plans as required by the District-Level QA Plan for Construction.

Contractors' Quality Control Plans Not Approved

Project Engineers did not approve contractors' QC plans for two of the projects, and for one project, the project engineer approved the QC plan after construction started. The project engineer approved the QC plan in a timely manner for the fourth project. The District-Level QA Plan states that the contractor's QC plans must be approved before commencement of physical work and approved by the project engineer using ENG Form 4025-R, "Transmittal of Shop Drawings, Equipment Data, Material Samples, or Manufacturer's Certificates of Compliance." The District-Level QA Plan provides guidance on the minimum contents of the QC plan, to include the name, qualifications, responsibilities of each person; procedures for tracking the three-phase inspection process; and a list of the definable features of work. ENG Forms 4025-R are approved or disapproved using action codes.[8]

Project engineers did not approve contractors' QC plans for two of the projects, and for one project, the project engineer approved the QC plan after construction started.

For example, the contractor's QC plan for the APS Compound (Figure 2) was not approved. The project engineer approved the ENG Form 4025-R (action code "C" - resubmission required) for the APS Compound Project, 48 days after the contractor began construction. The contractor was required to resubmit because the contractor's organizational chart did not include names of personnel and their qualifications. Instead of the contractor resubmitting a new ENG Form 4025-R for the project engineer to approve, the contractor only submitted a list of personnel and their qualifications. There was no evidence that the project engineer approved the ENG Form 4025-R in consideration of the contractor's list of personnel and their qualifications.

[8]Action codes includes, "A" - Approved as submitted; "B" - Approved, except as noted; "C" - Approved, except as noted, resubmission required; and "E" - Disapproved.

Figure 2. Army Preposition Stock Compound Project

Source: DoD OIG

On the other project with an unapproved QC plan, the Passenger Terminal project, (Figure 3) the project engineer disapproved (action code "E") the ENG Form 4025-R because the contractor did not provide a listing of key personnel and the key responsibilities of the QC manager. The contractor was required to resubmit a new ENG Form 4025-R. In this case, the project engineer did not have evidence that the contractor resubmitted the form for approval.

Figure 3. Passenger Terminal Project

Source: DoD OIG

For the remaining two construction projects:

- the project engineer approved the QC Plan for the Barracks project 30 days after construction started, and

- the project engineer approved the contractor's QC plan in a timely manner for the Fuel System project.

QA personnel were unaware of and could not explain why the ENG Form 4025-R was not approved for the APS Compound and the Passenger Terminal projects or why they approved ENG Form 4025-R after the project started. Without Government approval, there is no assurance that the contractors' QC plans conform to MILCON contract requirements. Therefore, the Commander, USACE TAN, needs to verify that project engineers approve the contractors' QC plans for MILCON projects before contractors start construction, as required by the District-Level QA Plan for Construction.

Improvements Needed in the Maintenance of Project Documentation

QA personnel did not always maintain critical documents needed to support ongoing QA efforts and use the USACE project tracking system, Resident Management System (RMS), to store essential QA documents.

Three-Phase Inspection Process Not Fully Documented

As part of the three-phase inspection process, project engineers and construction representatives did not always keep the contractors' meeting minutes to account for the performance and their monitoring of preparatory and initial inspections. The District-Level QA Plan states the purpose of the three-phase inspection process is to provide a procedure for QA personnel to assure that all construction, suppliers, and test laboratories comply with the applicable drawings, specifications, approved submittals, and authorized changes to the contract. The process consists of preparatory, initial, and follow-up inspections and is primarily the responsibility of the contractor. However, the District-Level QA Plan requires QA personnel, specifically the project engineer and construction representative, to actively participate in the three-phase inspection process.

Project engineers and construction representatives did not always keep the contractors' meeting minutes to account for the performance and their monitoring of preparatory and initial inspections.

According to the District-Level QA Plan, the preparatory inspection is a QC meeting with the contractor to discuss definable features of work, whereby initial inspections provides a check of preliminary work, to ensure compliance with contract requirements. Preparatory and initial inspections are accomplished near the beginning of each definable feature of work. The contractor documents each inspection with meeting minutes and the project engineer is required to maintain records of those minutes. Table 1 (page 9) provides a summary of QA personnel's maintenance of meeting minutes of preparatory and initial inspections prepared by the contractor for the four construction projects.

Table 1. Summary of Meeting Minutes of Preparatory and Initial Inspections Maintained by QA Personnel

Project	No. of Contractor Meeting Minutes Required	No. of Contractor Meeting Minutes Available		No. of Contractor Meeting Minutes Unavailable
		Preparatory Meetings	Initial Meetings	
Passenger Terminal	116	0	0	116
APS Compound	64	18	15	31
Fuel Systems	142	0	0	142
Barracks	58	20	2	36
Total	**380**	**38**	**17**	**325**

Overall, contractors for the four projects had 190 definable features of work, for which the contractors should have prepared a total of 190 preparatory and 190 initial meeting minutes (total of 380 meeting minutes required). In this regard, project engineers did not have meeting minutes for any of the contractors' preparatory and initial meetings for the Passenger Terminal and Fuel System projects. For the APS Compound project, the project engineer had 18 of the preparatory meeting minutes and 15 of the initial meeting minutes and for the Barracks project (Figure 4), the project engineer had 20 of the preparatory meeting minutes and 2 of the initial meeting minutes. The remaining 325 preparatory and initial meeting minutes were unavailable.

Figure 4. Barracks, Phases 11-14 Project

Source: DoD OIG

This occurred because QA personnel stated that they were either not aware of the requirement to maintain meeting minutes or that documenting meeting minutes was a contractor requirement, and, therefore, they did not see a need to retain copies. QA personnel stated they regularly participated in contractor meetings to ensure contract conformity, although they may not have maintained contractor meeting minutes as required. QA personnel expected contractors to

maintain preparatory and initial meeting minutes, but that was not always the case. For example, for the Fuel System project, the contractor was unable to provide preparatory and initial meeting minutes when requested by the project engineer.

Consequently, QA personnel could not show they were actively participating with contractors to ensure contract requirements were met. Therefore, the Commander, USACE TAN, needs to verify that project engineers and construction representatives attend contractors' preparatory and initial inspections and meetings and collect and maintain meeting minutes as part of the contractors' three-phase inspection process, as required by the District-Level QA Plan for Construction.

Project Tracking System Not Used

Project engineers and construction representatives did not consistently use USACE's project tracking system, RMS, to store project documentation to facilitate project management. The District-Level QA Plan states that project engineers are to ensure proper management through storing of project documentation in the RMS computer program.

Documentation, such as contractor QC documents, meeting minutes supporting the contractors' three-phased inspection process, and QA personnel daily site-visit reports, were not always stored in RMS. QA documents, if available, were kept in file cabinets, outside storage containers, or on computers. Additionally, RMS stored documents were not always completed in accordance with the District-Level QA Plan. Document deficiencies included incomplete documentation, missing pages, and lack of signatures.

Project engineers stated that this occurred because they did not always have time to take information from the different storage sources and store in RMS. One QA construction representative also informed us that he was inexperienced with using RMS.

Centrally storing information in RMS is essential to enable QA personnel to use the information to manage the projects and to provide for project management continuity in the event of QA personnel turnover. Therefore, the Commander, USACE TAN, needs to verify that QA personnel at the Bagram Area Office begin immediately updating RMS with all essential QA documentation as required by the District-Level QA Plan for Construction.

Contracting Officers' Designation Memoranda Responsibilities Not Followed

As the designated CORs for the four MILCON projects, resident engineers and project engineers did not comply with contract administration responsibilities identified in the contracting officer's designation memoranda. The contracting officer's designation memoranda required CORs to maintain adequate records to describe and document the performance of their duties. Files were to include QA inspections of contractor's performance, meeting minutes with contractors, and records relating to QA plan. In addition, CORs performed limited technical inspections of

Resident engineers and project engineers did not comply with contract administration responsibilities identified in the contracting officer's designation memoranda.

contractors' work and did not submit monthly status reports to the contracting officer, as required in the contracting officer's designation memoranda.

Adequate Records Not Maintained

CORs did not maintain adequate records to document the performance of their duties. Federal Acquisition Regulation Subpart 4.8, "Government Contract Files," states that contracting offices are to establish files containing the records of all contractual actions, to include evidence of QA records, to be a complete history of the transaction to provide a basis for making informed decisions, to support actions taken, and to provide information for reviews and investigations. The contracting officer's designation memoranda required that such records be maintained in the COR's file. The memoranda stated that at a minimum, the COR file will contain a QA plan, meeting minutes of inspections performed, and the results and minutes of pre-performance conferences and meetings with the contractor pertaining to the contract or contract performance, and records related to the contractor's QC system and plan. None of the CORs files met these requirements. For example, the COR file for the Fuel System project did not include records of inspections performed, the results and minutes of pre-performance conferences, or documentation of meetings, such as preparatory and initial inspection meetings with the contractor.

Limited Inspections of Contractors' Work Performed

CORs, through construction representatives, performed limited inspections of contractors' work to verify that the contractors complied with contract requirements. The contracting officer's designation memoranda required that CORs perform inspections to verify contractor performance of the technical requirements of the contract in accordance with the contract terms, conditions, and specifications and that all deficiencies be corrected by the contractor. Table 2 (page 13) summarizes the limited number of technical inspections performed by USACE technical specialists for each project. The need for increased technical inspections is discussed on page 12. As delegated, the CORs were responsible for ensuring that technical inspections were performed of definable features of work to verify that the contractors were satisfying contract requirements.

Monthly Status Reports Not Submitted

CORs did not initially submit monthly status reports to report to the contracting officers on contractors' performance. The contracting officers' designation memoranda required the CORs to submit a monthly report to the contracting officer concerning the contractors' performance of the services rendered. Despite the requirement in the designation memoranda, an Office of Business Oversight Branch USACE TAN official, responding on behalf of the contracting officer, stated that they initially did not attempt to enforce the requirement for CORs to submit monthly status reports. However, in December 2011, a COR stated that CORs were directed by USACE TAN to start submitting monthly status reports. In February 2012, CORs began submitting monthly status reports for their projects. Construction on the four MILCON projects had begun 14 to 20 months earlier.

CORs did not initially submit monthly status reports to report to the contracting officers on contractors' performance.

To illustrate, the contractor completed the Passenger Terminal project in September 2011. Although the project was identified as completed, the contractor continued to correct known deficiencies through February 2012. In February 2012, the resident engineer submitted the first monthly status report for the Passenger Terminal project. Since all deficiencies were identified as corrected in February 2012, no additional reports were submitted.

Contracting officers' designation memoranda responsibilities were not followed because QA personnel did not believe that all the requirements in the contracting officers' designation memoranda were necessary. As a consequence, USACE TAN contracting officers did not receive assurance from the CORs that the contractors' performance was meeting the requirements of the contract and regulatory guidance. Therefore, the Commander, USACE TAN, needs to direct contracting officers to verify that CORs maintain complete records, perform technical inspections of contractor's work, and submit monthly status reports as required in the contracting officers' designation memoranda.

Increased Performance of Technical Inspections of Contractors' Performance Needed

QA personnel arranged to have performed a limited number of technical inspections of the contractors' construction efforts. The District-Level QA Plan requires construction representatives to review QC and QA requirements before beginning any new phase of construction. In addition, they were to confirm the type of inspections to be performed, the frequency of testing, and the procedures to be taken in the event of test failures. Construction representatives were to coordinate technical inspections of mechanical, structural, and electrical systems, as required, drawing on the engineering section for advice throughout the project.

QA personnel arranged to have performed a limited number of technical inspections of the contractors' construction efforts.

The four MILCON projects included key electrical, structural, mechanical features of work that required technical inspections. However, construction representatives only arranged to have a limited number of technical inspections performed. Table 2 (page 13) provides a summary of technical inspections performed by USACE technical specialists as evidenced in QA personnel site visit reports.

Table 2. Summary of Technical Inspections Performed by USACE Technical Specialists

Project	No. of Recorded Days for Project	No. of Days Project Was Inspected	First and Last Day Technical Inspection Was Conducted	Key Features Inspected	Deficiencies Found
Passenger Terminal[1]	432	1	296/296	Electrical	0
APS Compound[1]	637	8	367/581	Electrical, Mechanical	62
Fuel System[2]	552	2	233/414	Electrical	1
Barracks[1]	397	3	259/347	Electrical	0

[1]Includes electrical; plumbing; sewage; fire suppression; communications; and heating, ventilating, and air conditioning.
[2]Includes electrical, fuel storage tank, fuel pumps, filters, lines, and equipment/controls.

Construction representatives typically sought technical inspections pertaining to electrical systems but neglected to have sewage, plumbing, and fire suppression systems technically inspected. USACE technical specialists performed at least one electrical technical inspection on all four projects while a mechanical technical inspection was only performed on the APS project. On average, the first technical inspection performed for the four projects occurred 289 days after the project was initiated. As required by the District-Level QA Plan, construction representatives should have been coordinating and requesting technical personnel support to perform technical inspections of mechanical, structural, and electrical systems throughout the projects.

This occurred because, except for an electrical technician onsite, technical specialists needed to conduct inspections were not available at the Bagram Area Office. To arrange for a technical specialist outside of the Bagram Area Office, QA personnel were required to coordinate with USACE TAN officials. However, QA personnel did not make such arrangements with USACE TAN officials. Instead, QA personnel relied on their own experience to conduct the inspections, even if they were not familiar with the key features of the work being performed. A project engineer stated that USACE had construction books for project engineers and construction representatives to reference if they were not familiar with a key feature of work. However, QA personnel actions were not an acceptable substitute for obtaining a qualified technical specialist to validate the acceptability of the contractors' construction efforts.

Additionally, because technical specialists were not available at the Bagram Area Office, QA personnel relied on technical support from the LOGCAP contractor to conduct such inspections.[9] The LOGCAP contract includes requirements for the contractor to provide operation and maintenance services for buildings on installations throughout Afghanistan. As part of their contract requirements, the LOGCAP contractor conducts technical inspections before assuming the maintenance responsibility for any buildings constructed by another contractor. During these technical inspections, the LOGCAP contractor may identify substandard construction requiring rework before they will assume responsibility for the maintenance of the building. When the LOGCAP contractor identifies any deficiencies, they provide the information to USACE project engineers for corrective action. The project engineers task the responsible MILCON contractor to take corrective actions on the deficiencies and the construction representatives follow-up to verify the deficiencies were corrected.

The LOGCAP contractor usually provided one to five technical specialists to conduct an inspection. Inspections occurred at least three times throughout the project. The technical specialists identified deficiencies related to plumbing, electrical, civil,[10] and heating, ventilation, and air conditioning. Although QA personnel relied on the LOGCAP contractor for technical inspections, the LOGCAP contractor was not responsible for ensuring that MILCON contract requirements for the four projects were met.

The Passenger Terminal project is a good example of the effect of not having technical specialists participate in inspections of project features of work. On the Passenger Terminal project, QA personnel did not use technical specialists to conduct plumbing inspections and consequently, the QA personnel did not identify any plumbing deficiencies. The LOGCAP contractor, on the other hand, conducted technical inspections after the project was accepted by the user and identified several deficiencies. Deficiencies identified by the LOGCAP contractor included too much fall or slope on the horizontal drainage pipes, pipe penetrations through the slabs on and above the ground were not sealed to specifications, and lavatory drains were not vented in accordance with the International Plumbing Code. The LOGCAP contractor indicated that improper plumbing installations would cause functioning problems. These deficiencies could have been detected during construction performance had technical specialists been involved in inspections of project features of work.

As a result of construction representatives not coordinating and requesting technical support for scheduled technical inspections, relying on their own experience to participate in the technical inspections, and relying on the LOGCAP contractor for detecting construction deficiencies, effective QA oversight was not performed to verify that the contractors met contract requirements. Consequently, QA officials did not reduce the risk of MILCON contractors not meeting contract requirements and USACE TAN paying for contractor services not rendered. Therefore, the Commander, USACE TAN, needs to assess the availability of technical specialists to support technical inspections at the Bagram Area Office and to verify that construction

[9] Inspections were for the APS Compound, Barracks, and Passenger Terminal projects. The Fuel System project was not subject to the LOGCAP.
[10] Civil deficiencies include structural, framework, and concrete work.

representatives coordinate the need for technical personnel to perform technical inspections as required by the District-Level QA Plan for Construction.

Impact of Not Providing Project Oversight

USACE does not have reasonable assurance that contractors' QC programs were effective and that the four MILCON projects met contract requirements. Because of the challenges associated with working in a contingency environment, such as Afghanistan, the roles of QA personnel are increasingly important in the QA process. In this environment, the need for CORs to more effectively manage and document their execution of the QA program is needed because incoming QA personnel need this information to properly administer and monitor projects.

Conclusion

The ineffective oversight of the four MILCON projects reviewed occurred because USACE TAN officials did not provide sufficient oversight of QA personnel. QA personnel were either unaware of, did not see a need for, or did not have time to follow internal guidance regarding QA. Ensuring the full implementation of QA requirements in guidance and seeing to the successful execution of the QA program is essential for construction in a contingency environment. Therefore, the Commander, USACE TAN, needs to conduct training on the requirements in the District-Level Quality Assurance Plan for Construction with all incoming and current QA personnel.

Management Comments on the Finding and Our Response

Management Comments on Three-Phase Inspection Process Not Fully Documented

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division, responding for the Commander, USACE TAN, stated he did not agree with the DoD Office of Inspector General contention that quality assurance personnel should have separate meetings for every definable feature of work and corresponding sets of documented meeting minutes for each feature. He stated the number of contractor meeting minutes required appears to be a requirement created by the DoD Office of Inspector General that misinterprets the District Quality Assurance Plan guidance. Additionally, he stated the USACE TAN District SOP C-8, Project-Level Quality Assurance Plans, April 30, 2010, clarifies that "a minimum of four (4) team meetings shall be conducted to develop, monitor, and execute the Project-Level QA Plan" and that the RMS also includes functions to identify definable features of work and record quality control and quality assurance testing.

Our Response

We did not establish that separate meetings for every definable feature of work should be held and corresponding sets of documented meeting minutes should be shown for each feature. Rather, USACE's District-Level Quality Assurance Plan requires that the three-phase inspection process be applied to each definable feature of work. However, quality assurance personnel hosting consolidated meetings with contractors to discuss multiple definable features of work is acceptable as long as quality assurance personnel can document and support in their meeting minutes that each definable feature of work was addressed.

Recommendations, Management Comments, and Our Response

We recommend that the Commander, U.S. Army Corps of Engineers Afghanistan Engineer District-North:

1. Verify that project engineers develop supplemental project quality assurance plans and approve contractor's quality control plans for military construction projects before contractors begin construction as required by the District-Level Quality Assurance Plan for Construction.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division, responding for the Commander, USACE TAN, agreed with the recommendation. Specifically, the Deputy Commander stated that the Commander, USACE TAN will continue to emphasize the importance of supplemental quality assurance plans and documenting the approval of contractor quality control plans. He stated that the area engineer will verify that those plans are developed and approved before construction begins. Additionally, the Deputy Commander stated that the USACE Transatlantic Division will validate, in March and June 2013, that supplemental quality assurance plans and quality control plans are developed and approved before construction begins.

2. Verify that project engineers and construction representatives attend contractors' preparatory and initial inspections and meetings and collect and maintain meeting minutes as part of the contractors' three-phase inspection process as required by the District-Level Quality Assurance Plan for Construction.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division agreed with the recommendation. The Deputy Commander stated that the Commander, USACE TAN will continue to emphasize the importance of meetings with contractors and maintaining documentation. He stated that while conducting monthly line-item reviews of area office projects, the area engineer will verify to the Commander, USACE TAN that project engineers are attending and documenting meetings. Additionally, the Deputy Commander stated that the USACE Transatlantic Division will validate, during staff assistance visits in March and June 2013, that USACE personnel are attending meetings with contractors as prescribed by the District-Level Quality Assurance Plan for Construction and that supporting documentation is being maintained.

3. Verify that quality assurance personnel at the Bagram Area Office begin immediately updating the resident management system with all required quality assurance documentation as required by the District-Level Quality Assurance Plan for Construction.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division agreed with the recommendation. The Deputy Commander stated that the Commander, USACE TAN instructed

Bagram Area Office personnel to ensure the RMS includes all required documentation. He stated that during monthly line-item reviews, the status of updating information in the RMS will be verified by the area engineer and reported monthly to the Commander, USACE TAN and staff. Additionally, the Deputy Commander stated that USACE Transatlantic Division personnel will validate, during staff assistance visits in March and June 2013, that Bagram Area Office personnel are updating the RMS with required quality assurance documentation.

4. Direct contracting officers to verify that contracting representatives maintain complete records, perform technical inspections, and submit monthly status reports, as required in the contracting officers' designation memoranda.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division agreed with the recommendation. The Deputy Commander stated that during 2012, the Director of Contracting, USACE issued additional policy for the certification and training of contracting officer's representatives. He stated that USACE TAN contracting implemented requirements of the new policy and that the Commander, USACE TAN will continue to emphasize the importance of documentation in contracting officer's representative files. Additionally, the Deputy Commander stated that the USACE Transatlantic Division will validate, during staff assistance visits in March and June 2013, that contracting officer's representatives are maintaining complete records, performing technical inspections, and submitting monthly status reports.

5. Assess the availability of technical specialists to support technical inspections at the Bagram Area Office and verify that construction representatives coordinate and request technical personnel support to perform technical inspections as required by the District-Level Quality Assurance Plan for Construction.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division agreed with the recommendation. Specifically, he stated that at the end of July 2012, the USACE TAN, Engineering and Construction Division, reorganized to reassign all quality assurance branch personnel and resources to area offices to improve the availability of technical expertise and enhance the quality assurance process. The Deputy Commander also stated that during monthly line-item reviews, the area engineer will verify to the Commander, USACE TAN that sufficient technical specialists are available and that technical inspections are being performed. Additionally, he stated that the USACE Transatlantic Division will validate, during staff assistance visits in March and June 2013, the number of quality assurance personnel assigned to the Bagram Area Office and that technical inspections are being performed.

6. Conduct training on the requirements in the District-Level Quality Assurance Plan for Construction with all incoming and current quality assurance personnel.

Management Comments

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division agreed with the recommendation. The Deputy Commander stated that the Area Office University provides quality assurance training to all quality assurance personnel before deployment. Further, he

stated that the Commander, USACE TAN will ensure that area engineers conduct additional quality assurance training as needed on the District-Level Quality Assurance Plan for Construction, with emphasis on the importance of inspections and comprehensive documentation. Additionally, the Deputy Commander stated that the USACE Transatlantic Division will validate, during staff assistance visits in March and June 2013, that quality assurance personnel are adhering to the District-Level Quality Assurance Plan for Construction.

Our Response

Comments from the Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division were responsive, and no additional comments are required.

Management Comments on the Internal Controls and Our Response

Management Comments on Review of Internal Controls

The Deputy Commander, U.S. Army Corps of Engineers, Transatlantic Division stated that the four projects reviewed were completed successfully, as evidenced by the pictures of the completed facilities in DoD Office of Inspector General's report. Further, he stated that USACE believes that the actions being taken in response to DoD Office of Inspector General's recommendations will improve oversight and strengthen internal controls.

Our Response

We acknowledge receipt of pictures showing completion of the projects. However, the pictures do not substantiate that the contractors' quality control programs were effective and the projects were completed in accordance with contract requirements. Without the required monitoring of contractor performance and the required quality assurance responsibilities, USACE cannot assure that the contractors fulfilled their contractual obligations to provide a quality product.

Appendix. Scope and Methodology

We conducted this performance audit from December 2011 through October 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our objective was to determine whether DoD provided effective oversight of military construction in Afghanistan. Specifically, our objective was to determine whether DoD properly monitored contractor performance during construction and adequately performed the QA oversight responsibility. To accomplish this objective, we reviewed documents dated from March 2010 to July 2012 related to MILCON project requirements, including the contracts, contract modifications, QA daily reports, DD Form 1354, "Transfer and Acceptance of DoD Real Property," COR designation letters and certifications, contractor QC plans, QA plans, three-phase control schedules, weekly progress meeting minutes, Fluor Intercontinental deficiency reports, and ENG Form 4025, "Transmittal of Shop Drawings, Equipment Data, Material Samples, or Manufacturer's Certificates of Compliance."

We contacted staff and conducted interviews, as appropriate, with USACE TAN personnel (Kabul and Bagram Area Office). USACE personnel we interviewed included contracting officers, area engineers, CORs, resident engineers, project engineers, and construction representatives. We conducted a site visit at the four selected projects, obtained source documentation, and observed and examined key documents related to USACE TAN QA oversight. We obtained and analyzed documents from Electronic Document Access System and RMS and compared them to statements and documents provided by USACE personnel.

We reviewed Federal, DoD, Army, and USACE regulations, instructions, and guidance. Specifically, we reviewed the Federal Acquisition Regulation; Defense Federal Acquisition Regulation Supplement; Army Engineering Regulation 1180-1-6, "Construction Quality Management," September 30, 1995; and USACE Afghanistan Engineering District, "District-Level QA Plan for Construction," April 2011.

Projects Reviewed

In January 2012, USACE officials provided a list of 51 MILCON projects in Afghanistan for FYs 2010 and 2011. We narrowed the list down to 20 projects by selecting the construction projects that were at least 40 percent completed. Of the 20 projects, totaling approximately $218.5 million, five projects were located at Bagram Airfield. We nonstatistically selected four of the five projects at Bagram Airfield, totaling approximately $49.6 million for review. We selected Project No. 71491, Army Prepositioned Stock Compound (Contract No. W912ER-10-C-0027); Project No. 71489, Barracks, Phases 11-14 (Contract No. W912ER-10-C-0044); Project No. ATUH100101, Passenger Terminal (Contract No. W912ER-10-C-0028); and Project No. 69398, Fuel System, Phase 6 (Contract No. W912ER-10-C-0024). We excluded the fifth project because it was under the same management as the Passenger Terminal project.

Use of Computer-Processed Data

We relied on computer-processed data from the Electronic Document Access System. Electronic Document Access is a Web-based system that provides online access of acquisition-related documents. We used the system to obtain contractual documents for the four contracts selected for this audit. We compared those electronically-accessed documents with statements and documents provided by USACE personnel. From these procedures, we are confident that the Electronic Document Access website was sufficiently reliable for the purpose of acquiring contract documents for our analysis of MILCON project oversight.

We also relied on computer-processed data from the RMS. The RMS is used by the USACE to maintain and update documentation related to construction projects. To verify the reliability of data, we tested documents provided by USACE by comparing those documents to what was recorded in RMS. From these procedures, we are confident that the documentation in RMS was sufficiently reliable for the purpose of acquiring construction oversight documents for our analysis of the effectiveness of MILCON project oversight in Afghanistan.

Prior Coverage

During the last 5 years, the Department of Defense Office of Inspector General issued five reports related to military construction projects in Afghanistan. Unrestricted DoD IG reports can be accessed at http://www.dodig.mil/audit/reports.

DoD IG

DoD IG Report No. 2012-089, "Better Contract Oversight Could Have Prevented Deficiencies in the Detention Facility in Parwan, Afghanistan," May 17, 2012

DoD IG Report No. D-2012-057, "Guidance Needed to Prevent Military Construction Projects from Exceeding the Approved Scope of Work," February 27, 2012

DoD IG Report No. D-2010-059, "Contingency Contracting: A Framework for Reform," May 14, 2010

DoD IG Report No. SPO-2009-005, "Assessment of Electrical Safety in Afghanistan," July 24, 2009

DoD IG Report No. D-2008-119, "Construction Contracting Procedures Implemented by the Joint Contracting Command-Iraq/Afghanistan," September 29, 2008

U.S. Army Corps of Engineers Transatlantic Division Comments

DEPARTMENT OF THE ARMY
UNITED STATES ARMY CORPS OF ENGINEERS
TRANSATLANTIC DIVISION
255 FORT COLLIER ROAD
WINCHESTER, VIRGINIA 22603-5776

REPLY TO
ATTENTION OF

CETAD-IR

30 OCT 2012

MEMORANDUM FOR Department of Defense Inspector General (DoDIG), ATTN: Michael J. Roark, Director, Joint and Southwest Asia Operations, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: U.S. Army Corps of Engineers (USACE) Response to DoDIG Draft Report, USACE Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan, Project No. D2012-D000JB-0071.000

1. Enclosed is USACE Transatlantic Division response to the DODIG Draft Report, USACE Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan, Project No. D2012-D000JB-0071.000.

2. My point of contact for these comments is [redacted]

Encl

John S. Hurley
JOHN S HURLEY
Colonel, USA
Deputy Commander

Enclosure not included in report

SUBJECT: USACE Comments to DODIG Draft Report "U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan," Project No. D2012-D000JB-0071.000

USACE comments are provided for the draft report per the paragraphs identified and for the recommendations as shown.

Review of Internal Controls. USACE would like to point out that the four projects reviewed by DODIG were completed successfully as evidenced by the pictures of the completed facilities shown in DODIG's report. USACE believes that the actions being taken in response to DODIG's recommendations will improve oversight and strengthen internal controls.

Finding. U.S. Army Corps of Engineers Afghanistan Engineering District-North Contract Oversight of Military Construction Projects Was Not Effective.

Three-Phase Inspection Process Not Fully Documented.

We disagree with the DoDIG contention that QA personnel should have separate "meetings" for every "definable feature of work" and therefore corresponding sets of documented "meeting minutes" for each feature. The "No. of Contractor Meeting Minutes Required" appears to be a requirement created by the DoDIG that misinterprets the District QA Plan guidance. As further clarified in the TAN District SOP C-8, Project-Level Quality Assurance Plans, 30 Apr 10, "a minimum of four (4) team meetings shall be conducted to develop, monitor, and execute the Project-Level QA Plan." The RMS also includes functions to identify definable features of work and record QC and QA testing.

Recommendations. We recommend that the Commander, U.S. Army Corps of Engineers Afghanistan Engineer District-North:

Recommendation 1. Verify that project engineers develop supplemental project quality assurance plans and approve contractor's quality control plans for military construction projects before contractors' begin construction as required by the District-Level Quality Assurance Plan for Construction.

Concur. The Area Engineer will verify that supplemental quality assurance plans and quality control plans are developed and approved before construction begins. The USACE TAN Commander will continue to emphasize the importance of supplemental quality assurance plans and documenting the approval of contractor quality control plans prior to construction start. Additionally, the Transatlantic Division (TAD) will validate, during staff assistance visits in March and June 2013, that supplemental quality assurance plans and quality control plans are developed and approved before construction begins.

Recommendation 2. Verify that project engineers and construction representatives attend contractors' preparatory and initial inspections and meetings and collect and maintain meeting minutes as part of the contractors' three-phase inspection process as required by the District-Level Quality Assurance Plan for Construction.

SUBJECT: USACE Comments to DODIG Draft Report "U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan," Project No. D2012-D000JB-0071.000

Concur. The USACE TAN Commander and staff conduct monthly line item reviews of area office projects. During these reviews, the Area Engineer will verify to the TAN Commander that project engineers are attending and documenting meetings. The TAN Commander will continue to emphasize the importance of meetings with contractors and maintaining documentation. Additionally, TAD will validate, during staff assistance visits in March and June 2013, that USACE personnel are attending meetings with contractors as prescribed by the District-Level Quality Assurance Plan for Construction and that supporting documentation is being maintained.

Recommendation 3. Verify that quality assurance personnel at the Bagram Area Office begin immediately updating the resident management system with all required quality assurance documentation as required by the District-Level Quality Assurance Plan for Construction.

Concur. The USACE TAN Commander has instructed Bagram Area Office personnel to ensure the Resident Management System (RMS) includes all required documentation. The status of updating information in the RMS will be verified by the Area Engineer and reported monthly to the TAN Commander and staff during monthly line item reviews. Additionally, TAD will validate, during staff assistance visits in March and June 2013, that Bagram Area office personnel are updating the RMS with required quality assurance documentation

Recommendation 4. Direct contracting officers to verify that contracting officer's representatives maintain complete records, perform technical inspections, and submit monthly status reports as required in the contracting officers' designation memoranda.

Concur. During 2012, the USACE Director of Contracting issued additional policy for the certification and training of CORs. TAN Contracting has implemented requirements of the new policy and the TAN Commander will continue to emphasize the importance of documentation in COR files. Additionally, TAD will validate, during staff assistance visits in March and June 2013, that CORs are maintaining complete records, performing technical inspections and submitting monthly status reports.

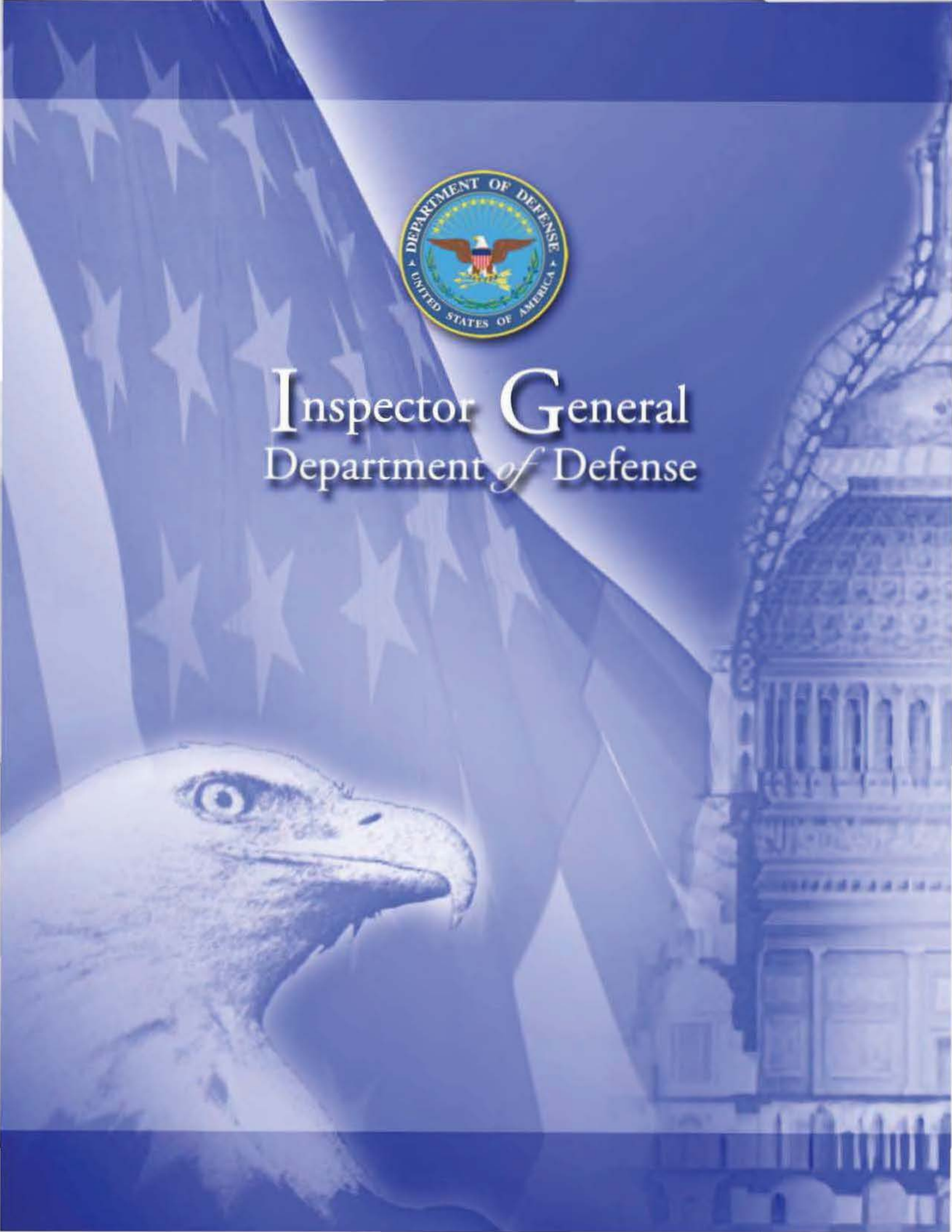
Recommendation 5. Assess the availability of technical specialists to support technical inspections at the Bagram Area Office and verify that construction representatives coordinate and request technical personnel support to perform technical inspections as required by the District-Level Quality Assurance Plan for Construction.

Concur. At the end of July 2012, the USACE TAN Engineering and Construction Division reorganized to reassign all Quality Assurance Branch personnel and resources to Area Offices to improve the availability of technical expertise and enhance the quality assurance process. During monthly line item reviews, which are attended by the TAN Commander and staff, the Area Engineer will verify to the Commander that sufficient technical specialists are available and that technical inspections are being performed. Additionally, TAD will validate, during staff

assistance visits in March and June 2013 the number of quality assurance personnel assigned to the Bagram Area Office and that technical inspections are being performed.

Recommendation 6. Conduct training on the requirements in the District-Level Quality Assurance Plan for Construction with all incoming and current quality assurance personnel.

Concur. USACE's Area Office University provides quality assurance training to all QA personnel prior to deployment. The USACE TAN Commander will ensure that Area Engineers conduct additional QA training as needed on the District-Level Quality Assurance Plan for Construction, with emphasis on the importance of inspections and comprehensive documentation. Additionally, TAD will validate, during staff assistance visits in March and June 2013 that quality assurance personnel are adhering to the District-Level Quality Assurance Plan for Construction.



Inspector General
Department of Defense