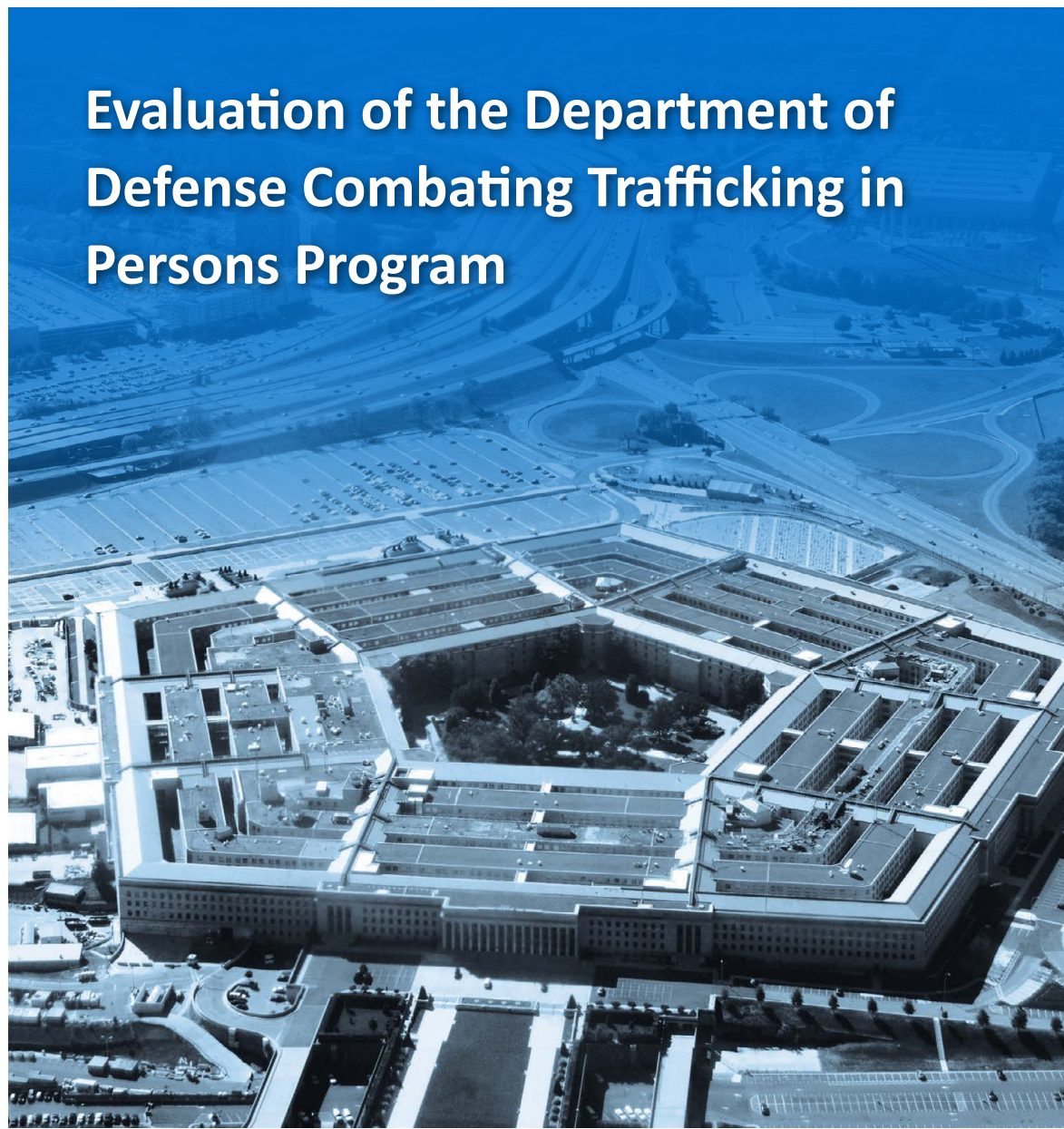




INSPECTOR GENERAL

U.S. Department of Defense

JUNE 16, 2014



Evaluation of the Department of Defense Combating Trafficking in Persons Program

INTEGRITY ★ EFFICIENCY ★ ACCOUNTABILITY ★ EXCELLENCE

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Results in Brief

Evaluation of the Department of Defense Combating Trafficking in Persons Program

June 16, 2014

Objective

The objective for this project was to review DoD Combating Trafficking in Persons program performance and compliance with DoD Instruction 2200.01, "Combating Trafficking in Persons (CTIP)," September 15, 2010.¹ This capping report summarizes findings resulting from our multi-year review which began in 2009, in response to the requirement for the Inspectors General of the Department of Defense, Department of State, and United States Agency for International Development to investigate a sample of contracts for which there was a heightened risk that contractors may engage in acts related to trafficking in persons.²

We performed field work from 2009 to 2012 and follow-up in 2013. The team visited 67 Department of Defense organizations at 46 installations. We conducted over 280 briefings, interviews, and sensing sessions with over 300 military and Department of Defense civilian personnel, and over 200 contractor personnel. The team reviewed Department of Defense Component policies, procedures, and available Combating Trafficking in Persons inspection reports.

¹ Department of Defense Instruction 2200.01, "Combating Trafficking in Persons (CTIP)," September 15, 2010, Enclosure 2, Section 6.a.

² "William Wilberforce Trafficking in Victims Protection Reauthorization Act of 2008," Public Law 110-457, Section 232, December 23, 2008.

Observations

As a result of our program review, site visits, and interviews the DoD OIG found several examples of positive actions by DoD Components to combat trafficking in persons:

- The Defense Procurement and Acquisition Policy Office, Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics has drafted guidance to implement changes in United States Government and Department of Defense policy regarding Combating Trafficking in Persons.
- The Army and Air Force Exchange Service developed a "Bill of Workers Rights" and were proactive in addressing allegations of trafficking in persons in the United States Central Command area of operations.
- On their own initiative, the Army Contracting Command-Kuwait and the Defense Contract Management Agency incorporated Combating Trafficking in Persons into contract quality assurance.

In addition, the DoD OIG found:

- Department of Defense Combating Trafficking in Persons programs did not meet current U.S. Government and Department of Defense policy statements.
- Most DoD Components had not reviewed their Combating Trafficking in Persons programs.
- The Office of the Under Secretary of Defense for Personnel and Readiness had not completed any routine reviews of Department of Defense Components' self-assessments of their Combating Trafficking in Persons programs.



Results in Brief

Evaluation of the Department of Defense Combating Trafficking in Persons Program

Observations (cont'd)

- The Joint Staff and combatant commands have not adequately addressed Combating Trafficking in Persons in operational and contingency plans.
- Department of Defense Combating Trafficking in Persons training compliance was incomplete and did not provide specific Combating Trafficking in Persons training for certain job functions.
- d. Establishes a clear and comprehensive process for reporting trafficking in persons incidents and sharing information among appropriate Department of Defense organizations.

Recommendations, Management Comments, and Our Response

Recommendation 1

Under Secretary of Defense for Personnel and Readiness, publish updated Department of Defense Combating Trafficking in Persons guidance that:

- a. Fully incorporates U.S. Government Combating Trafficking in Persons policy, taking into consideration Department of Defense Combating Trafficking in Persons Task Force findings.
- b. Reinforces Department of Defense Component reporting requirements regarding CTIP metrics and relevant information.
- c. Specifies, in detail, Combating Trafficking in Persons program elements for Department of Defense acquisition; investigation and law enforcement; operational planning; and training functions.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness concurred with Recommendations 1.a, 1.b, 1.c, and 1.d, and provided plans for revising DoD CTIP guidance accordingly.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Recommendations 1.a, 1.b, 1.c, and 1.d. No further comments are required at this time.

Revised Recommendation 2

Under Secretary of Defense for Personnel and Readiness, expand program monitoring by the Combating Trafficking in Persons Program Management Office to include a review of Department of Defense Components' self-assessments of their Combating Trafficking in Persons programs.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness non-concurred with the initial draft version of Recommendation 2, and stated that it is the responsibility of the DoD Components to assess their own CTIP programs, and that,



Results in Brief

Evaluation of the Department of Defense Combating Trafficking in Persons Program

Recommendations, Management Comments, and Our Response (cont'd)

at the request of the Combating Trafficking in Persons Program Management Office, Components may provide CTIP program briefings to present their findings and share best practices.

Our Response

In the draft report circulated for management comments, the draft version of Recommendation 2 was

Under Secretary of Defense for Personnel and Readiness, expand program monitoring by the Combating Trafficking in Persons Program Management Office to include a review of Department of Defense Combating Trafficking in Persons programs.

In response to comments from the Office of the Under Secretary of Defense for Personnel and readiness, the DoD OIG revised text in the discussion and Recommendation 2 to increase clarity, by stating that the Office of the Under Secretary of Defense for Personnel and Readiness needs to review DoD Components' self-assessments of their CTIP Programs, rather than conducting the reviews of the DoD Components' CTIP Programs.

The DoD OIG finds the Office of the Under Secretary of Defense for Personnel and Readiness to be partially responsive to Revised Recommendation 2. While the Components are responsible for assessing their own CTIP programs, the Office of the Under Secretary of Defense for Personnel and Readiness has the responsibility to monitor Component CTIP compliance, which involves oversight and review of Components' self-assessments of their CTIP programs. The DoD OIG requests that the Office of the Under Secretary of Defense for Personnel and Readiness respond to Revised Recommendation 2 by July 16, 2014 with a plan to review DoD Components' self-assessments of their CTIP programs.

Recommendation 3.a

Under Secretary of Defense for Personnel and Readiness, update Department of Defense Combating Trafficking in Persons policy to require combatant command joint plans, and other relevant documents to include Combating Trafficking in Persons guidance and information, where necessary.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness concurred with Recommendation 3.a, and provided a plan to address the matter in future CTIP guidance, in coordination with the Joint Staff and Combatant Commands.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Recommendation 3.a. No further comments are required at this time.

Recommendation 3.b

Director, Joint Staff, in coordination with commanders of the combatant commands:

1. Assess Combating Trafficking in Persons as part of routine operations and force planning and deployment.
2. Review joint plans, deployment orders and post-conflict plans for inclusion of Combating Trafficking in Persons considerations.
3. Monitor implementation of Combating Trafficking in Persons policies during all operations.



Results in Brief

Evaluation of the Department of Defense Combating Trafficking in Persons Program

Recommendations, Management Comments, and Our Response (cont'd)

Joint Staff

The Vice Director, Joint Staff, concurred with Recommendations 3.b.1, 3.b.2, and 3.b.3, and provided a plan for addressing the matters.

Our Response

The DoD OIG finds the comments of the Vice Director, Joint Staff, to be responsive to Recommendations 3.b.1, 3.b.2, and 3.b.3. No further comments are required at this time.

Revised Recommendation 4.a

Under Secretary of Defense for Personnel and Readiness:

1. Implement the stated intent of the Deputy Secretary of Defense requiring Department of Defense contractors to complete annual Combating Trafficking in Persons training by publishing it in Department of Defense policy.
2. In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, the director of the Joint Staff, and the secretaries of the military departments, develop and implement specialized Combating Trafficking in Persons training for legal counsel and strategic planners.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness non-concurred with draft Recommendation 4.a.1 and stated that the CTIP Instruction assigns them the responsibility to develop overall guidance for DoD CTIP, rather than to enforce compliance. The Office of the Under Secretary

of Defense for Personnel and Readiness concurred with draft Recommendations 4.a.2 and 4.a.3, and provided a plan to require DoD contractors to complete annual CTIP training, as well as to develop and provide additional specialized CTIP training.

Our Response

In the draft report circulated for management comments, the draft version of Recommendation 4.a.1 was:

Under Secretary of Defense for Personnel and Readiness: Enforce Department of Defense Component compliance with the requirement to conduct annual Combating Trafficking in Persons awareness training for all Component members.

In response to comments from the Office of the Under Secretary of Defense for Personnel and Readiness, the DoD OIG deleted draft Recommendation 4.a.1, regarding Office of the Under Secretary of Defense for Personnel and Readiness enforcement of CTIP awareness training requirements, added a discussion on the subject in Observation 4, and changed draft Recommendations 4.a.2 and 4.a.3 to Revised Recommendations 4.a.1 and 4.a.2.

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Revised Recommendation 4.a.1 and 4.a.2. No further comment is required at this time.



Results in Brief

Evaluation of the Department of Defense Combating Trafficking in Persons Program

Recommendations, Management Comments, and Our Response (cont'd)

Recommendation 4.b

Under Secretary of Defense for Acquisition, Technology and Logistics, upon issuance of a Department of Defense policy requirement for Department of Defense contractors to complete annual Combating Trafficking in Persons training, request that the Defense Federal Acquisition Regulation Supplement address this training requirement.

Under Secretary of Defense for Acquisition, Technology and Logistics

The Office of the Under Secretary of Defense for Acquisition, Technology and Logistics concurred with Revised Recommendation 4.b in this report, and stated they would develop a plan to implement the requirement once a DoD policy requirement is issued.

Our Response

In the draft report circulated for management comments, the draft version of Recommendation 4.a.2 was:

Under Secretary of Defense for Personnel and Readiness, In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, implement the stated intent of the Deputy Secretary of Defense requiring Department of Defense contractors to complete annual Combating Trafficking in Persons training.

Based on comments from and discussion with representatives of the Office of the Under Secretary of Defense for Personnel and Readiness, and the Office of the Under Secretary of Defense for Acquisition, Technology and Logistics, the DoD OIG revised draft Recommendation 4.a.2, splitting it into Revised Recommendation 4.a.1 and a newly created Recommendation 4.b, to better align with current responsibilities of both Offices.

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Acquisition, Technology and Logistics to be responsive to Recommendation 4.b. No further comment is required at this time.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
The Under Secretary of Defense for Personnel and Readiness	2	1.a, 1.b, 1.c, 1.d, 3.a, 4.a.1, 4.a.2
Under Secretary of Defense for Acquisition, Technology and Logistics		4.b
Director, Joint Staff		3.b.1, 3.b.2, 3.b.3

Total Recommendations in this report: 12

For recommendations requiring response, please reply by July 16, 2014.



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

June 16, 2014

**MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS
UNDER SECRETARY OF DEFENSE FOR ACQUISITION, TECHNOLOGY
AND LOGISTICS
DIRECTOR, JOINT CHIEFS OF STAFF**

**SUBJECT: Evaluation of the DoD Combating Trafficking in Persons Program
(Report No. DoDIG-2014-079)**

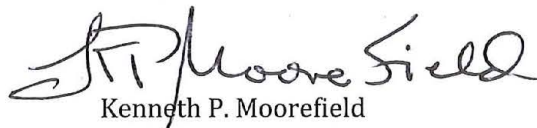
The Deputy Inspector General, Special Plans and Operations, is providing this report for review and comment. We considered management comments to a draft of this report when preparing the final report.

Comments from the Office of the Under Secretary of Defense for Acquisition, Technology and Logistics, as well as the Vice Director, Joint Staff, were fully responsive.

Comments from the Office of the Under Secretary of Defense for Personnel and Readiness were fully responsive for all relevant recommendations with the exception of Recommendation 2, where their response was partially responsive. We subsequently clarified, and have issued in this report, a Revised Recommendation 2. As a result, we ask that the Office of the Under Secretary of Defense for Personnel and Readiness respond by July 16, 2014, to Revised Recommendation 2.

Please provide a response that conforms to the requirements of DoD Directive 7650.3. If possible, send your response in electronic format (Adobe Acrobat file only) to SPO@dodig.mil. Copies of your response must have the actual signature of the authorizing official for your organization. We are unable to accept the /Signed/ symbol in place of the actual signature.

We appreciate the courtesies extended to the staff. Please direct questions to SPO@dodig.mil. We will provide a formal briefing on the results if management requests.


Kenneth P. Moorefield
Deputy Inspector General
Special Plans and Operations



Contents

Introduction

Background and Criteria	1
Objective	5
Scope and Methodology	5

Ongoing DoD Efforts to Combat Trafficking in Persons

Observation 1. Combating Trafficking in Persons Program Guidance and Implementation

Observation 2 Inadequate Combating Trafficking in Persons Program Oversight

Observation 3. Strategic Planning

Observation 4. Combating Trafficking in Persons Training—DoD Military, Civilian, and Contractor Personnel

Follow-Up on Prior Recommendations

Appendixes

Appendix A. Scope and Methodology	33
Appendix B. Prior Coverage	35
Appendix C. Department of Defense Combating Trafficking in Persons Task Force Members	36

Management Comments

Acronyms and Abbreviations



Introduction

Prior to 2000, allegations of sexual slavery, sex with minors, and human trafficking involving U.S. contractors in Bosnia and Herzegovina led to administrative and criminal investigations by U.S. Government agencies. In 2002, a local television news program aired a report alleging that women trafficked from the Philippines, Russia, and Eastern Europe were forced into prostitution in bars in South Korea frequented by U.S. military personnel, which resulted in an investigation and changes in DoD policy. In 2004, official DoD reports chronicled allegations of forced labor and debt bondage against U.S. contractors in Iraq, and, in 2008, workers for a subcontractor supporting U.S. troops in Iraq rioted over poor treatment. These incidents were contrary to U.S. Government policy regarding official conduct³ and reflected poorly on DoD. Starting in 2000, Congress had passed a series of legislative acts, described below, to address its concern regarding allegations of U.S. Government contractor and U.S. forces' involvement in sexual slavery, human trafficking, and debt bondage.

Background and Criteria

Federal Law

In 2000, the President signed into law two anti-trafficking statutes:

- Public Law 106-386, October 28, 2000, which included the “Victims of Trafficking and Violence Protection Act of 2000,” and
- Public Law 106-523, November 22, 2000, “Military Extraterritorial Jurisdiction Act of 2000.”

The stated purposes of the first statute are “. . . to combat trafficking in persons (CTIP), a contemporary manifestation of slavery whose victims are predominantly women and children, to ensure just and effective punishment of traffickers, and to protect their victims.” The second statute established “Federal jurisdiction over offenses committed outside the United States by persons employed by or accompanying the Armed Forces, or by members of the Armed Forces who are released or separated from active duty prior to being identified and prosecuted for the commission of such offenses.”

³ Executive Order 13257 “President’s Interagency Task Force To Monitor and Combat Trafficking in Persons,” of February 13, 2002, and Executive Order 13333, “Amending Executive Order 13257 To Implement the Trafficking Victims Protection Reauthorization Act of 2003,” March 18, 2004.

Congress specifically extended this extraterritorial jurisdiction over Trafficking in Persons (TIP) offenses committed by persons employed by or accompanying the Federal Government outside the United States in Public Law 109-164, “Trafficking Victims Protection Reauthorization Act Of 2005,” January 10, 2006.

Additional reauthorizations expanded the scope and applicability of the original statute. Public Law 108-193, the “Trafficking Victims Protection Reauthorization Act of 2003,” December 19, 2003, gave the Government the added authority to terminate grants, contracts, or cooperative agreements for TIP-related violations.

Sections 1701-1708, “Ending Trafficking in Government Contracting,” of Public Law 112-239, “The National Defense Authorization Act for Fiscal Year 2013,” January 2, 2013, expanded the reporting requirements for TIP allegations, requiring reporting by contractors, as well as expanding the investigative requirements of contracting offices, local commands, and Inspectors General when they receive allegations of TIP.

Finally, Public Law 113-4, “Violence Against Women Reauthorization Act of 2013,” signed on March 17, 2013, included Title XII, “Trafficking Victims Protection,” which reauthorized and further amended the statutes governing U.S. Government efforts to combat TIP internationally and within the U.S.

Executive Policy

In 2002, the President issued National Security Presidential Directive 22, “Trafficking in Persons,” December 16, 2002, instructing Federal agencies to “strengthen their collective effort, capabilities, and coordination to support the policy to combat trafficking in persons.” In 2004, the Secretary of Defense, Deputy Secretary of Defense, and Under Secretaries of Defense for Policy and for Personnel and Readiness issued policy memorandums whose primary focus was TIP awareness training.

Department of Defense Instruction 2200.01, “Combating Trafficking in Persons,” (DoD CTIP Instruction) February 16, 2007, replaced DoD policy statements. The DoD CTIP Instruction articulated policy beyond training and awareness to include:

- deterring and opposing TIP activities,
- educating DoD military and civilian personnel,
- increasing CTIP efforts by commanders worldwide, and
- incorporating CTIP provisions in service contracts.

In 2006, the Civilian Agency Acquisition Council and the Defense Acquisition Council agreed on an interim rule implementing the above stated requirement, adding Federal Acquisition Regulation Subpart 22.17, “Combating Trafficking in Persons.” The regulation states that the “subpart applies to all acquisitions,” and that, pursuant to paragraph 22.1705, the Federal Acquisition Regulation contract clause 52. 222-50, “Combating Trafficking in Persons,” is to be inserted in all solicitations and contracts. DoD revised and reissued the DoD CTIP Instruction on September 15, 2010, naming the CTIP Policy Programs and Support Office of the Office of the Under Secretary of Defense for Personnel and Readiness (DoD CTIP Program Management Office) as the responsible office. The DoD CTIP Instruction states that it is DoD CTIP policy to:

- a. Oppose prostitution, forced labor, and any related activities, as described in section 3, that may contribute to the phenomenon of TIP as inherently harmful and dehumanizing. TIP is a violation of U.S. law and internationally recognized human rights, and is incompatible with DoD core values.
- b. Deter activities of DoD service members, civilian employees, indirect hires, contract personnel, and command-sponsored dependents that would facilitate or support TIP, domestically and overseas. This includes activities such as pandering, prostitution, and patronizing a prostitute, even though such activities may be legal within a host nation country, but which are in violation of chapter 47 of title 10, U.S.C. (also known as “The Uniform Code of Military Justice” . . . and paragraph 97, part IV of Manual for Courts-Martial 2008).

On September 25, 2012, the President issued Executive Order 13627, “Strengthening Protections Against Trafficking in Persons in Federal Contracts.” The order required:⁴

- The Federal Acquisition Regulation Council to amend the Federal Acquisition Regulation to expressly prohibit contractors, subcontractors, and their employees from:
 - using misleading or fraudulent recruitment practices,
 - charging employees recruitment fees,
 - withholding employee identity documents, and
 - failing to pay return transportation costs at the end of employment.

⁴ Department of Defense Instruction 2200.01, “Combating Trafficking in Persons,” September 15, 2010.

- Contractors, by contract clause, to agree to:
 - cooperate fully with U.S. Government agencies conducting audits or investigations of TIP allegations,
 - notify agency Inspectors General, suspension and debarment officials, and law enforcement if they become aware of any TIP or related activities, and
 - develop a CTIP compliance plan when the estimated value of supplies or services to be performed outside the U.S. exceeds \$500,000.
- The Administrator for Federal Procurement Policy to:
 - develop guidance to agencies on internal procedures and controls,
 - develop methods to track TIP incidents, and
 - implement CTIP training requirements for the Federal acquisition workforce.

Department of State Leadership

The Office to Monitor and Combat Trafficking in Persons of the U.S. Department of State leads the U.S. Government's global engagement against human trafficking, with responsibility for bilateral and multilateral diplomacy, targeted foreign assistance, and public engagement. This office, in conjunction with the National Security Council Staff, leads the President's Interagency Task Force to Monitor and Combat Trafficking in Persons, which oversees the development of strategy, planning, and implementation of U.S. Government activities regarding monitoring and combating TIP. The Secretary of Defense is an active participant in this task force.

The Office to Monitor and Combat Trafficking in Persons publishes an annual "Trafficking in Persons Report," presenting a global summary of the nature and scope of the issue, and a by-country summary of the broad range of government actions taken to confront and eliminate it. The reports for 2012 and 2013 included recommendations for the U.S. Government, including:⁵

⁵ "Trafficking in Persons Report," Department of State, June 2012, page 360, and "Trafficking in Persons Report," Department of State, June 2013, page 382. Accessible at <http://www.state.gov/j/tip/rls/tiprpt/index.htm>.

- improve human trafficking case data collection and analysis,
- strengthen implementation of and increase resources for enforcement of the “zero tolerance” policy,
- pursue civil or criminal prosecutions or other sanctions such as debarment for noncompliant employers and labor contractors,
- expand universal and specialized CTIP training to the Federal workforce,
- increase the role of survivors of human trafficking in policy development,
- continue to increase CTIP efforts in existing Government structures,
- expand CTIP outreach, and
- offer comprehensive victim services to all identified, eligible victims.

These recommendations demonstrate the continued expansion of U.S. Government efforts beyond training, awareness, and contract language. While not binding, the recommendations provide items for consideration to improve TIP incident detection, investigation, and enforcement; outreach and assistance to TIP victims; and strategic planning.

Objective

The objective for this project was to:

- review a sample of DoD contracts for compliance with the “Trafficking Victims Protection Act of 2000,” (Title 22, U.S. Code, Chapter 78) as amended,
- summarize DoD CTIP investigative efforts, and
- review DoD compliance with DoD Instruction 2200.01, “Combating Trafficking in Persons,” September 15, 2010,”⁶ and CTIP program performance.

Prior reports published in 2010 through 2012 addressed the first two listed objectives.⁷ This report summarizes findings with regard to DoD compliance with the DoD CTIP Instruction.

Scope and Methodology

See Appendix A.

⁶ Department of Defense Instruction 2200.01, “Combating Trafficking in Persons (CTIP),” September 15, 2010, Enclosure 2, Section 6.a.

⁷ See Appendix B for a listing of these reports.



Ongoing DoD Efforts to Combat Trafficking in Persons

In April 2012, the DoD CTIP Program Management Office initiated a DoD CTIP Task Force to coordinate and facilitate DoD efforts related to CTIP awareness, contract language, TIP incident reporting, investigations, and corrective actions. The DoD CTIP Task Force included participation by select DoD Components.⁸ Positive results included the development of a strategic plan and, in August 2012, the deployment of a team to Afghanistan sponsored by the DoD CTIP Program Management Office. This team observed DoD CTIP program implementation and helped resolve TIP-related issues in Afghanistan.

The DoD CTIP Program Management Office reported that it has initiated revision to the DoD CTIP Instruction, along with supporting planning guidance documents, but did not specify a timeframe for their publication.

Over the course of field work, including site visits to eight countries in the area of responsibility for three combatant commands, the DoD OIG team identified several initiatives taken by DoD organizations to improve DoD Component programs and general CTIP awareness.

- The Defense Procurement and Acquisition Policy Office of the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics has drafted guidance to implement Executive Order 13627, “Strengthening Protections Against Trafficking In Persons In Federal Contracts.” The policy, when finalized in the Federal Acquisition Regulation and the Defense Federal Acquisition Regulation Supplement, will incorporate all the requirements of the Executive Order.
- Actions by the Defense Procurement and Acquisition Policy Office and the acquisition organizations of the Military Services have resulted in a significant increase in the rate of CTIP clause inclusion in DoD contracts.⁹ The rate of inclusion of the CTIP clause in sampled contracts increased from 50 percent to 97 percent during fiscal years 2009 to 2011, the three years that we evaluated DoD contracts.

⁸ See Appendix C, Department of Defense Combating Trafficking in Persons Task Force Members

⁹ Federal Acquisition Regulation Clause 52.222-50, “Combating Trafficking in Persons.”

- The Army and Air Force Exchange Service developed a “Bill of Workers Rights” and was proactive in the Central Command area of operations. Managers were inspecting employees working and housing conditions and conducting random passport checks to verify employers were not holding them.
- On their own initiative, the Army Contracting Command-Kuwait and the Defense Contract Management Agency incorporated CTIP considerations into contract quality assurance in Kuwait, Qatar, and Afghanistan. Contract quality assurance personnel used a command-developed checklist to verify that contractors met CTIP requirements. The Defense Procurement and Acquisition Policy Office stated their intent to require similar checklists for all DoD contract administration.
- The Defense Procurement and Acquisition Policy Office participated in changes to the Federal Acquisition Regulation and initiated changes to the Defense Federal Acquisition Regulation Supplement. Further, office officials:
 - defined contracting officer responsibilities to maintain surveillance over contractor CTIP compliance,
 - published the “Department of Defense COR [Contracting Officer Representative] Handbook,” “Defense Contingency Contracting Handbook,” and “Defense Contingency COR [Contracting Officer Representative] Handbook,” that included guidance concerning CTIP awareness and reporting.
- The Defense Procurement and Acquisition Policy Office, along with the DoD CTIP Program Management Office:
 - provided input to standardized contracting office CTIP training for contingency environments,
 - published and distributed a worker’s rights brochure and wallet cards, as shown below, which are available in eight languages.

Figure 1. CTIP Contract Wallet Card for Workers in a Contingency Contracting Environment



Source: Contingency Contracting Directorate, Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics. Available at <http://ctip.defense.gov/Resources.aspx>

- The U.S. Central Command Joint Theater Support Contracting Command had developed supplemental contract clauses that address CTIP issues in Iraq and Afghanistan. These clauses required all prime and subcontractors performing DoD contracts to:
 - allow employees to retain their passports,
 - provide employees with signed copies of their employment contract in English and their native language,
 - provide adequate living conditions for their employees (and defines such) as well as to incorporate checks of employees' life support areas in quality control programs,
 - comply with international and host-nation transit/exit/entry requirements, and
 - prohibit prime and subcontractors performing DoD contracts from using "unlicensed recruiting firms or firms that charge illegal recruiting fees."



Observation 1

Combating Trafficking in Persons Program Guidance and Implementation

The DoD Components did not adequately develop their CTIP programs in accordance with current U.S. Government and DoD policy statements.

DoD Component CTIP programs remained underdeveloped in that there was:

- inadequate guidance to define the scope of programmatic CTIP responsibilities, and
- the lack of a clear process for reporting and investigating TIP allegations within, and sharing TIP-related information among, DoD Components.

As a result, responsible officials in DoD could not demonstrate CTIP program compliance, and could not effectively report that it was adequately investigating, deterring, or correcting potential TIP incidents.

Discussion

The purpose of the “Trafficking Victims Protection Act of 2000,”¹⁰ as amended, is to combat trafficking in persons, ensure effective punishment of traffickers, and protect trafficking victims. National Security Presidential Directive 22 elaborated further, stating that Government policy must include:

- vigorous enforcement of the law;
- raised awareness at home and abroad;
- identification, protection, and assistance for victims;
- reduced vulnerability of individuals to trafficking; and
- use of diplomacy and foreign policy tools to encourage other nations to combat TIP.

¹⁰ Codified at United States Code Title 22 Sections 7101-7112.

During site visits the DoD OIG found that the DoD Components conducted mandatory CTIP training required by the CTIP Instruction and tracked training completion, with a significant number of DoD Components missing reporting deadlines by more than a month. Some Components took initiative beyond mandated training, including:

- holding CTIP awareness days,
- incorporating CTIP into an emergency response drill, and
- supplementing CTIP training with local and cultural considerations.

However, few Components were able to demonstrate that they had included additional program elements, such as including CTIP awareness in operational or contingency planning or processes for the prevention, detection, investigation, and correction of TIP incidents, as required by the statute and Executive directives cited above. We also found little evidence of Component self-evaluations of their CTIP training programs.

Combating Trafficking in Persons Guidance

The DoD CTIP Instruction did not provide sufficient guidance for DoD organizations to develop their own procedures for establishing and maintaining their own CTIP programs. The DoD CTIP Instruction required the heads of DoD Components to:

- establish policies and procedures to implement the DoD CTIP program;
- designate a Component CTIP office of primary responsibility and a CTIP program officer;
- conduct an annual CTIP awareness training program for all Component members;
- conduct periodic evaluations of CTIP awareness training;
- provide CTIP program data (training participation of DoD personnel, contractor adherence to CTIP policy consistent with Federal Acquisition Regulation, and disposition of criminal cases for TIP-related offenses); and
- increase efforts to pursue indicators of TIP in commercial establishments, place offending establishments off-limits, and support host-country authorities to combat TIP.¹¹

¹¹ DoD Instruction 2200.01, "Combating Trafficking in Persons," September 15, 2010, Enclosure 2, Section 7.

Most commanders and executive leaders we interviewed requested additional guidance and clarification regarding the CTIP program and its implementation. For example, the DoD CTIP Instruction requires designation of Component CTIP program officers, but provides insufficient guidance describing mandatory or suggested CTIP program elements. These elements would likely vary based on the role or mission of the organization or its potential impact on DoD efforts to combat TIP.

Table 1 outlines where additional CTIP program guidance would be of value.

Table 1. Potential CTIP Guidance

Function/Organization	Potential Areas for Additional Guidance
Acquisition	Inclusion of CTIP elements into DoD and Service acquisition policy, and procedures
Investigation and Law Enforcement	Identification and detection of TIP; collaboration with DoD Acquisition organizations; as well as TIP victim identification, assistance, and referral
Operational Planning	Inclusion of CTIP elements into operations and contingency planning

Source: DoD OIG

The DoD CTIP Instruction tasks the Under Secretary of Defense for Personnel and Readiness, in coordination with the Under Secretary of Defense for Policy, with the responsibility for developing additional CTIP guidance for the DoD Components.”¹²

Notification of Contracting Officers of Trafficking in Persons Incidents

In a previous report,¹³ the DoD OIG observed that contractor-initiated reporting, as required by the Federal Acquisition Regulation, was often the only means by which DoD contracting offices obtained timely and relevant releasable information regarding actual or alleged TIP violations.

Criminal investigative organizations did not provide relevant information to contracting offices. Furthermore, there was no DoD law enforcement policy requirement to share TIP-related, publicly releasable information with Commanders, contracting commands, or other relevant organizations.

The failure to share releasable TIP-related information from criminal investigations with U.S Government contracting organizations could impede their ability to make

¹² DoD Instruction 2200.01, “Combating Trafficking in Persons,” September 15, 2010, Enclosure 2, Section 1.a.

¹³ DoD Office of the Inspector General Report Number IE-2010-001, “Evaluation of DoD Contracts Regarding Combating Trafficking in Persons,” January 15, 2010.

fully informed decisions regarding contracting actions. Conversely, the lack of sharing impeded the ability of law enforcement organizations to conduct a comprehensive investigation to identify offenders or make arrests. It also hinders commanders from limiting installation access of TIP offenders at overseas bases.

As of March 2014, the DoD CTIP Instruction did not address procedures for proactively sharing publicly releasable TIP-related case information with contracting offices, or for sharing other TIP-related information between contracting, law enforcement, and commanders responsible for CTIP programs. This is a law enforcement policy matter for which the Under Secretary of Defense for Personnel and Readiness has responsibility.

In response to DoD and congressional interest in CTIP incidents associated with DoD, the DoD CTIP Program Management Office formed a CTIP Task Force to identify and address DoD CTIP issues. The Task Force includes members of many DoD organizations, and one of the tasks that it was undertaking was to develop a TIP incident reporting flowchart, with supporting process descriptions, for inclusion into DoD CTIP guidance.

As U.S. Government policy regarding TIP evolves, executive leadership and commanders should review U.S. Government and DoD CTIP policy and demonstrate command emphasis regarding CTIP to maximize the effectiveness of their CTIP program implementation.

Recommendations, Management Comments, and Our Response

Recommendation 1

Under Secretary of Defense for Personnel and Readiness, publish updated Department of Defense Combating Trafficking in Persons guidance that:

- a. Fully incorporates U.S. Government Combating Trafficking in Persons policy, taking into consideration Department of Defense Combating Trafficking in Persons Task Force findings.**
- b. Reinforces Department of Defense Component reporting requirements regarding CTIP metrics and relevant information.**
- c. Specifies, in detail, Combating Trafficking in Persons program elements for Department of Defense acquisition; investigation and law enforcement; operational planning; and training functions.**
- d. Establishes a clear and comprehensive process for reporting trafficking in persons incidents and sharing releasable information among appropriate Department of Defense organizations.**

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness concurred with Recommendations 1.a, 1.b, 1.c, and 1.d, and provided plans for revising DoD CTIP guidance accordingly.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Recommendations 1.a, 1.b, 1.c, and 1.d. No further comments are required at this time.



Observation 2

Inadequate Combating Trafficking in Persons Program Oversight

Few DoD Components had assessed their CTIP programs, as required by the DoD CTIP Instruction.

The Office of the Under Secretary for Personnel and Readiness had not effectively monitored and reviewed DoD Component CTIP compliance.

Consequently, DoD Components were not encouraged to comply and did not identify missing and under-performing CTIP program elements and, therefore, could not take appropriate corrective action.

Discussion

The DoD CTIP Instruction requires the heads of the DoD Components to “conduct periodic evaluation of CTIP awareness training, periodically involve the Component Inspectors General in the conduct of these evaluations, and provide the results of evaluations to the Component IGs.”¹⁴ During our interviews with DoD Components and military commands through July 2013, we found that few had conducted a CTIP program review.

The DoD CTIP Instruction further requires the Under Secretary of Defense for Personnel and Readiness to, “monitor compliance with this instruction.”¹⁵ During our assessment, representatives from the DoD CTIP Program Management Office and other executive leadership stated they had not planned or completed any reviews of Component CTIP program assessments, beyond conferences and workshops where Component program coordinators briefed their programs.

In 2012, staff in the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics discovered that current DoD and U.S. Central Command regulations required that field commands process contracted workers arriving from outside the theater through local worker reception centers for workforce integration, management, and training in the contingency environment. However,

¹⁴ Department of Defense Instruction 2200.01, “Combating Trafficking in Persons (CTIP),” September 15, 2010, Enclosure 2, Section 7.d

¹⁵ Department of Defense Instruction 2200.01, “Combating Trafficking in Persons (CTIP),” September 15, 2010, Enclosure 2, Section 1.i.

field commands in the U.S. Central Command area of responsibility had not established worker reception centers,¹⁶ missing an opportunity to increase worker awareness.

The DoD CTIP Program Management Office maintained contact with Component program officers. They sponsored annual meetings with Component program officers to discuss CTIP policy and emerging issues. They also chaired monthly meetings of the CTIP Task Force at which DoD-wide CTIP issues were discussed.

Finally, the DoD CTIP Program Management Office annually requested 1 Component input consisting of DoD CTIP training metrics, CTIP related information required for the “[U.S.] Attorney General’s Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons,” as well as a list of Component annual accomplishments. These were not necessarily good indicators of Component CTIP program performance, especially in lieu of assessments of DoD Component CTIP programs.

Performance evaluation is an essential part of managing DoD programs and ensuring they achieve desired outcomes. For many organizations, inclusion of CTIP program reviews into existing command or inspector general inspections could substantially contribute to awareness of program compliance. Reporting significant results of these inspections through appropriate chains of command to the DoD CTIP Program Management Office would improve the office’s ability to monitor and improve DoD CTIP performance. Periodic field validation and one-on-one discussions with DoD Components by the DoD CTIP Program Management Office would further strengthen its ability to reduce the occurrence or severity of DoD TIP incidents.

Recommendation, Management Comments, and Our Response

Revised Recommendation

In the draft report circulated for management comments, the draft version of Recommendation 2 was:

Under Secretary of Defense for Personnel and Readiness, expand program monitoring by the Combating Trafficking in Persons Program Management Office to include a review of Department of Defense Combating Trafficking in Persons programs.

¹⁶ Department of Defense Instruction 3020.41, “Operational Contract Support,” December 20, 2011, section 4.c.1

In response to comments from the Office of the Under Secretary of Defense for Personnel and Readiness, the DoD OIG revised text in the discussion and Recommendation 2 to increase clarity, by stating that the Office of the Under Secretary of Defense for Personnel and Readiness needs to review DoD Components' *self-assessments* of their CTIP Programs, rather than conducting the reviews of the DoD Components' CTIP Programs.

Recommendation 2

Under Secretary of Defense for Personnel and Readiness, expand program monitoring by the Combating Trafficking in Persons Program Management Office to include a review of Department of Defense Components' self-assessments of their Combating Trafficking in Persons programs.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness non-concurred with draft Recommendation 2, stating that it is the responsibility of DoD Components to assess their own CTIP programs, and that at the request of the Combating Trafficking in Persons Program Management Office, Components may provide CTIP program briefings to present their findings and share best practices.

Our Response

The DoD OIG finds the Office of the Under Secretary of Defense for Personnel and Readiness to be partially responsive to Revised Recommendation 2. While the Components are responsible for assessing their own CTIP programs, the Office of the Under Secretary of Defense for Personnel and Readiness has the responsibility to monitor Component CTIP compliance, which includes oversight and review of Components' self-assessments of their CTIP programs. The DoD OIG requests that the Office of the Under Secretary of Defense for Personnel and Readiness respond to Revised Recommendation 2 by July 16, 2014 with a plan to review DoD Components' self-assessments of their CTIP programs.



Observation 3

Strategic Planning

Combatant command operational and contingency plans did not adequately address CTIP.

This occurred because of inadequate guidance in the DoD CTIP Instruction and insufficient oversight by the Joint Staff regarding CTIP information in combatant commands' joint plans, deployment orders and other documents.

As a result, combatant commands and joint task forces were not adequately prepared to mitigate potential TIP violations, respond to alleged TIP incidents, or efficiently report CTIP incident summary statistics that occurred during the execution of routine operations, or contingency operations and deployments.

Discussion

The DoD CTIP Instruction assigns the Joint Staff three primary oversight functions:

- assess CTIP as part of the overall force planning function for any force deployment decision, including establishment of new DoD bases overseas and annually reassess the CTIP posture of deployed forces;
- review the combatant commanders' joint plans, deployment orders, and other relevant documents and include CTIP information, where necessary, monitor the combatant commanders' post-conflict plans and programs for inclusion of CTIP; and
- monitor implementation of the policies in the DoD CTIP Instruction and in related implementing instructions during military operations.¹⁷

During our fieldwork, we interviewed officials assigned to the Joint Staff and four combatant commands who had responsibility for Component CTIP programs and reviewed related planning and other documents. While we found that combatant commanders had developed CTIP policy and were providing information on TIP incidents to the DoD CTIP Program Management Office, we found no evidence that operational and contingency plans included CTIP considerations, beyond a reference to the DoD CTIP Instruction.

¹⁷ Department of Defense Instruction 2200.01, "Combating Trafficking in Persons (CTIP)," September 15, 2010, Enclosure 2, Section 9.a.-c.

The DoD CTIP Instruction does not include a specific requirement for the combatant commands to include CTIP considerations in their routine operations or operational/contingency plans. The DoD CTIP Instruction required combatant commanders to:

- develop policy documents to establish theater-level requirements for CTIP within their respective areas of operation;
- develop CTIP policy and program guidance unique to each combatant command, supplementing DoD CTIP training to include unique cultural and legal considerations for their respective areas of responsibility;
- provide oversight to theater and country TIP awareness training provided by subordinate Component commanders;
- provide information on indictments and convictions regarding all known TIP cases to the Under Secretary of Defense for Personnel and Readiness DoD Program Manager; and
- provide subordinate Component commanders with TIP intelligence and information pertinent to ongoing theater and country TIP awareness training.¹⁸

Therefore, even though the DoD CTIP Instruction required the Joint Staff to assess CTIP as part of the overall force planning function for any force deployment and review joint plans, deployment orders, and other relevant documents, there was no requirement for combatant commanders to include CTIP considerations into joint plans and deployment orders.

In addition, Joint Staff executive leadership stated that they tracked CTIP training for personnel assigned to the Joint Staff, but had not attempted to execute the remaining responsibilities assigned to them by the DoD CTIP Instruction. Specifically, they had not provided guidance on or assessed the inclusion of CTIP information into joint plans of the combatant commands or subordinate task forces. The CTIP Program Management Office reported they were working with the Joint Staff to include CTIP considerations into joint planning.

During site visits and interviews, the DoD OIG found that U.S. Government personnel assigned overseas (Afghanistan, Kuwait, Qatar, Germany, Korea, and Japan) were

¹⁸ Department of Defense Instruction 2200.01, "Combating Trafficking in Persons (CTIP)," September 15, 2010, Enclosure 2, Section 10.a.–e.

generally aware of CTIP statutes and DoD CTIP regulations, as a result of mandatory training. However, most command personnel interviewed had a limited understanding of how to apply statutes and regulations to their specific locality and actions to take should they become aware of a potential TIP incident.

During document reviews and the conduct of interviews, the DoD OIG found that few organizations below the combatant commands had developed CTIP policies, procedures, or localized training supplements. Also, in most combatant commands, CTIP was not specifically included in command inspections. This shortage of policy and other guidance hindered commands' prevention, identification, assessment, investigation, and response to potential TIP incidents.

It is important that combatant commands, or any commands operating in contingency environments, have adequate command-level policies and procedures to protect all workers, including local and other country national workers, from TIP incidents or activities, provide a means to investigate allegations, and apply corrective actions regarding DoD contractors who may be in violation of CTIP regulations.

Recommendations, Management Comments, and Our Response

Recommendation 3.a

Under Secretary of Defense for Personnel and Readiness, update Department of Defense Combating Trafficking in Persons policy to require combatant command joint plans, and other relevant documents to include Combating Trafficking in Persons guidance and information, where necessary.

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness concurred with Recommendation 3.a, and provided a plan to address the matter in future CTIP guidance, in coordination with the Joint Staff and Combatant Commands.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Recommendation 3.a. No further comments are required at this time.

Recommendation 3.b

Director, Joint Staff, in coordination with commanders of the combatant commands:

- 1. Assess Combating Trafficking in Persons as part of routine operations and force planning and deployment.**
- 2. Review joint plans, deployment orders and post-conflict plans for inclusion of Combating Trafficking in Persons considerations.**
- 3. Monitor implementation of Combating Trafficking in Persons policies during all operations.**

Joint Staff

The Vice Director, Joint Staff, concurred with Recommendations 3.b.1, 3.b.2, and 3.b.3 and provided a plan for addressing the matters.

Our Response

The DoD OIG finds the comments of the Vice Director, Joint Staff, to be responsive to Recommendations 3.b.1, 3.b.2, and 3.b.3. No further comments are required at this time.

Observation 4

Combating Trafficking in Persons Training—DoD Military, Civilian, and Contractor Personnel

DoD Component implementation of CTIP awareness training was not sufficiently benefitting its intended recipients.

The training was incomplete because:

- not all DoD Component military and civilian personnel reported taking the mandatory annual CTIP training developed and approved by the Office of the Under Secretary of Defense for Personnel and Readiness,
- the Office of the Under Secretary of Defense for Personnel and Readiness had not published policy requiring DoD contractors to complete the annual CTIP training, and
- specialized CTIP training was not available for, legal counsel and strategic planners.

DoD personnel and contractors who do not complete CTIP training or are provided insufficient training have reduced awareness of DoD efforts to deter activities that would facilitate or support TIP, and potentially miss opportunities to prevent, detect, and report TIP-related incidents.

Discussion

The data collected from the DoD Components by the DoD CTIP Program Management Office for the annual CTIP training report indicated that a significant number of DoD personnel had not reported completion of the required training. In addition, during site visits to DoD installations in locations with a higher risk for TIP-related violations outside of the continental United States, the DoD OIG observed that DoD contractors directly responsible for employees had not received awareness training. Finally, personnel in several locations we visited indicated that the standard CTIP training product developed by the DoD CTIP Program Management Office was the only CTIP training available.

Mandatory Combating Trafficking in Persons Training Compliance

The DoD CTIP Instruction requires mandatory annual CTIP awareness training for all Component members. The DoD Components are required to annually provide CTIP training completion metrics to the DoD CTIP Program Management Office. From 2009 to 2012, the data showed that 70 percent of DoD personnel had completed the required CTIP training. For 2013, the data indicated a significant improvement to 92 percent of DoD personnel completing the CTIP training. However, the reported 8 percent noncompliance means that potentially over 180,000 DoD personnel did not complete the mandatory CTIP training in 2013.¹⁹

We did not observe significant operational impediments to Component implementation of the CTIP training requirements. The DoD CTIP Program Management Office-developed training package was short in duration (approximately one hour to complete) and readily available online and in PowerPoint, hardcopy, and group training formats. The DoD CTIP Instruction also required the heads of the DoD Components to conduct periodic evaluations of their CTIP awareness training. The DoD OIG found little evidence of oversight of Component CTIP programs beyond the simple requirement to report annual training numbers. Publishing a summary of DoD Component CTIP training compliance may improve DoD Component performance.

Combating Trafficking in Persons Training for DoD Contractors

The DoD CTIP Instruction did not require contractor personnel executing DoD contracts to complete awareness training, or require the DoD CTIP Program Management Office or the heads of Components to provide awareness materials to DoD contractors. In response to this concern, at a March 15, 2012, meeting of the President's Interagency Task Force to Monitor and Combat Trafficking in Persons, the Deputy Secretary of Defense stated that the Department would make annual CTIP training mandatory for DoD contractors. The Office of the Under Secretary of Defense for Personnel and Readiness was reportedly developing policy and procedures to implement this policy statement.

As of December 2013, the DoD CTIP Program Management Office reported that for assignments within the U.S. Central Command area of responsibility, DoD contractors

¹⁹ DoD Components reporting CTIP training completion rates below 85 percent were: the Department of Defense Education Activity, U.S. Navy, Defense Intelligence Agency, U.S. Marine Corps, the Office of the Under Secretary of Defense Comptroller, and the Office of the Director, Administration and Management.

take the CTIP training and are provided with CTIP information specific to the U.S. Central Command area of operations when processing through a mobilization center.²⁰ However, CTIP training metric data for 2013 showed that less than half of DoD contractors outside of the continental United States reported taking CTIP awareness training. The CTIP training metric data did not indicate whether any DoD contractors within the continental United States had received CTIP awareness training.²¹

Specialized Combating Trafficking in Persons Training

Within the DoD Components and military commands, there were positions and occupational specialties that exercised key CTIP roles and responsibilities that were not adequately addressed in the DoD CTIP awareness training. While the DoD law enforcement community had implemented specialized CTIP training, legal counsel and staff planners could benefit from training better focused on their roles and responsibilities.

- Legal counsel needs to be alerted to relevant local national laws and treaties regarding human trafficking, their relation to U.S. law and potential impact on operations with respect to labor practices, status of forces agreements, and other provisions that may impact CTIP.
- Combatant command and joint task force staff planners need to be able to apply DoD CTIP policy to force planning and force deployment, contingency plans, and post-conflict planning.

The Office to Monitor and Combat Trafficking in Persons of the U.S. Department of State, in its Trafficking in Persons Reports for 2012 and 2013, also identified the need for the U.S. Government to expand specialized CTIP training for the Federal workforce, including increased training on indicators of human trafficking.

The DoD CTIP Program Management Office reported that it has been developing specialized training. They have regularly revised the CTIP annual awareness training and the specialized CTIP training for law enforcement personnel. In addition, the Office of Defense Procurement and Acquisition Policy of the Under Secretary of Defense for Acquisition, Technology, and Logistics included a brief mention of CTIP in

²⁰ This training is required for all DoD Military civilian and contract personnel by U.S. Central Command Regulation 570-4, "Combating Trafficking in Persons (CTIP), August 19, 2011, section 5.a.(2).

²¹ The DoD Combating Trafficking in Person's Training Report – 2013, provided by the DoD CTIP Program Management Office on December 23, 2013 stated that 49,733 out of 118,908 DoD Contractors outside of the continental United States were reported to have received the DoD CTIP training. The report did not indicate whether any DoD contractors within the continental United States had received DoD CTIP training.

the DoD contingency contracting course taught at the Defense Acquisition University. During 2013, both offices reported that they were developing additional CTIP guidance, training, and awareness materials for the acquisition community.

The actions of DoD military, civilian, and contractor personnel directly affect mission completion and the overall credibility and reputation of the DoD and the U.S. Government. DoD personnel who are not aware of TIP and how to identify it are similarly hindered in its investigation, correction, or prevention.

Recommendations, Management Comments, and Our Response

Revised Recommendations

In the draft report circulated for management comments, the draft version of Recommendation 4.a.1 was:

Under Secretary of Defense for Personnel and Readiness:
Enforce Department of Defense Component compliance with the requirement to conduct annual Combatting Trafficking in Persons awareness training for all Component members.

In response to comments from the Office of the Under Secretary of Defense for Personnel and Readiness, the DoD OIG deleted draft Recommendation 4.a.1, regarding Office of the Under Secretary of Defense for Personnel and Readiness enforcement of CTIP awareness training requirements, added a discussion on the subject in Observation 4, and changed draft Recommendations 4.a.2 and 4.a.3 to Revised Recommendations 4.a.1 and 4.a.2.

In the draft report circulated for management comments, the draft version of Recommendation 4.a.2 was:

Under Secretary of Defense for Personnel and Readiness:
In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, implement the stated intent of the Deputy Secretary of Defense requiring Department of Defense contractors to complete annual Combating Trafficking in Persons training.

Based on comments from and discussion with representatives of the Office of the Under Secretary of Defense for Personnel and Readiness, and the Office of the Under Secretary of Defense for Acquisition, Technology and Logistics, the DoD OIG revised draft Recommendation 4.a.2, splitting it into Revised Recommendation 4.a.1 and a newly created Recommendation 4.b, to better align with current responsibilities of both Offices.

Recommendation 4.a

Under Secretary of Defense for Personnel and Readiness:

- 1. Implement the stated intent of the Deputy Secretary of Defense requiring Department of Defense contractors to complete annual Combating Trafficking in Persons training by publishing it in Department of Defense policy.**
- 2. In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, the director of the Joint Staff, and the secretaries of the military departments, develop and implement specialized Combating Trafficking in Persons training for, legal counsel and strategic planners.**

Under Secretary of Defense for Personnel and Readiness

The Office of the Under Secretary of Defense for Personnel and Readiness non-concurred with draft Recommendation 4.a.1, and stated that the CTIP Instruction assigns them the responsibility to develop overall guidance for DoD CTIP, rather than to enforce compliance. The Office of the Under Secretary of Defense for Personnel and Readiness concurred with draft Recommendations 4.a.2, and 4.a.3, and provided a plan to require DoD contractors to complete annual CTIP training, as well as to develop and provide additional specialized CTIP training.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Personnel and Readiness to be responsive to Revised Recommendation 4.a.1 and 4.a.2. No further comment is required at this time.

Recommendation 4.b

Under Secretary of Defense for Acquisition, Technology and Logistics, upon issuance of a Department of Defense policy requirement for Department of Defense contractors to complete annual Combating Trafficking in Persons training, request that the Defense Federal Acquisition Regulation Supplement address this training requirement.

Under Secretary of Defense for Acquisition, Technology and Logistics

The Office of the Under Secretary of Defense for Acquisition, Technology and Logistics concurred with newly created Recommendation 4.b in this report, and stated they would develop a plan to implement the requirement, once a DoD policy requirement is issued.

Our Response

The DoD OIG finds the comments of the Office of the Under Secretary of Defense for Acquisition, Technology and Logistics to be responsive to newly created Recommendation 4.b. No further comment is required at this time.

Follow-Up on Prior Recommendations

As of February 2014, the Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology had not completed modifications to contracts they identified in December 2011 as deficient with respect to CTIP requirements.

This occurred because subordinate commands had not responded to statutes and Federal Acquisition Regulations, as well as memos and policy alerts issued in November 2011, and February 2012, by the Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology.

While the Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology had reduced the number of deficient contracts that did not meet CTIP statutes, regulations, and guidance, their action was not complete.

Discussion

Section 232 of the “William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008,” Public Law 110-457 (December 23, 2008), required the Inspectors General of the Department of Defense, the Department of State, and the United States Agency for International Development to investigate a sample of contracts for which there was a heightened risk that a contractor may engage in acts related to TIP.

In response, we examined over 900 contracts solicited, awarded, or administered by Army, Navy, Marine Corps, and Air Force commands, and the Defense Contract Management Agency. The contract sample consisted of construction and service contracts, each with a total value of \$5 million or more, with periods of performance between 2009 and 2011, and a place of performance in countries in the areas of responsibility of the U.S. Pacific, Central, European and Africa Commands. We published four reports summarizing our findings (see Appendix B).

For each contract, the responsible contracting officer stated whether the mandatory CTIP clause(s) were present. We consolidated and verified the data provided. The Military Services developed corrective action plans to correct deficient contracts in response to recommendations from our CTIP evaluation reports.

As of May 2014, responsible commands had not modified 15 contracts identified as deficient, out of 974 reviewed, to incorporate the required CTIP clauses. All 15 contracts belong to the Office of the Assistant Secretary of the Army for Acquisition,

Logistics, and Technology, which had concurred with our prior recommendations to modify the deficient contracts to include the relevant CTIP clauses.²² In the summer and fall of 2013, the Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology directed correction of the deficient contracts, but as of May 2014, U.S. Army commands had not completed the contract modifications.

²² DoD OIG Report DODIG-2012-041, "Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: U.S. European Command and U.S. Africa Command," January 17, 2012, pages 7 and 8; and DoD OIG Report DODIG-2012-086, "Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: Afghanistan," May 15, 2012, pages 6 and 8.

Appendix A

Scope and Methodology

We conducted this review in accordance with DoD CTIP Instruction; the Inspector General Act of 1978, as amended; and “Quality Standards for Inspection and Evaluation,” Council of the Inspectors General on Integrity and Efficiency, January 2012.

We conducted site visits from October 2009 through August 2012. Our field work resulted in publication of four reports meeting a statutory requirement to assess DoD inclusion of the FAR CTIP Clause in contracts, and this report summarizing DoD compliance with the DoD CTIP Instruction and CTIP program performance.

We reviewed the CTIP policies and programs at 67 DoD organizations, including the Military Services, many DoD Components, as well as subordinate or regional DoD offices that we believed could have a larger impact on the potential for TIP incidents to occur, or to be mitigated. We chose those locations or offices because they had a higher likelihood of sending workers outside of the country on temporary or permanent duty, or were likely to have a significant number of contracts with places of performance outside of the continental U.S.

We visited 46 installations, conducting over 280 briefings, interviews, and sensing sessions with over 300 military and DoD civilian personnel and over 200 DoD contractor personnel. We also contacted selected DoD administrative and criminal investigation organizations to learn how they process TIP allegations. We reviewed available CTIP inspection reports conducted by U.S. Forces Korea and U.S. Army-Central.

We discussed with commanders their understanding and emphasis regarding CTIP and program implementation by their staff and subordinate organizations. We interviewed CTIP program officers, legal counsel, command inspectors general, and leadership and staff of law enforcement, acquisition and contracting, contract management, quality assurance, and training organizations.

We met with program personnel at the DoD CTIP Program Management Office; the Defense Procurement and Acquisition Policy Office of the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics; and responsible leadership of the Military Services, combatant commands, and the Joint Staff. Finally, we met with DoD OIG officials responsible for the DoD TIP Hotline and TIP-related investigations.

Limitations

We limited the scope of this evaluation to the DoD CTIP program, as well as those of the DoD Components and subordinate commands.

Use of Computer-Processed Data

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

Use of Technical Assistance

We did not use technical assistance to perform this evaluation.

Appendix B

Prior Coverage

The Department of Defense Inspector General (DoD IG) issued four reports directly relating to the objectives of this project. Unrestricted DoD IG reports can be accessed at <http://www.dodig.mil/pubs/index.cfm>.

DoD OIG

Report No. DODIG-2012-086, “Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: Afghanistan,” May 15, 2012

Report No. DODIG-2012-041, “Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: U.S. European Command and U.S. Africa Command,” January 17, 2012

Report No. SPO-2011-002, “Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: U.S. Central Command,” January 18, 2011

Report No. IE-2010-001, “Evaluation of DOD Contracts Regarding Combating Trafficking in Persons,” January 15, 2010

Report No. IE-2007-002, “Evaluation of DoD Efforts to Combat Trafficking in Persons,” November 21, 2006

Appendix C

Department of Defense Combating Trafficking in Persons Task Force Members

1. Office of the Under Secretary of Defense for Personnel and Readiness, Defense Human Resources Activity, Policy & Programs Support
2. Defense Contract Management Agency
3. Defense Logistics Agency
4. Defense Manpower Data Center, Synchronized Pre-deployment & Operational Tracker Project Management Office
5. Office of Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology and Logistics
6. Office of the Secretary of Defense Comptroller, Defense Contract Audit Agency
7. Office of the Under Secretary of Defense for Policy
8. Office of the Secretary of Defense, Office of General Counsel
9. U.S. Army, Office of the Assistant Secretary of the Army for Military and Reserve Affairs; Policy and Support Directorate, Office of the Deputy Assistant Secretary of the Army for Procurement
10. U.S. Navy, Military and Reserve Affairs
11. U.S. Air Force, Air Force Services Strategic Requirements
12. U.S. Marine Corps, Personnel Policy
13. Joint Chiefs of Staff, J-1, J-5, and J7
14. Army and Air Force Exchange Service
15. U.S. Pacific Command
16. U.S. Special Operations Command, Training Directorate
17. U.S. Central Command J4 and J5
18. U.S. Central Command Joint Theater Support Contracting Command
19. DoD OIG Hotline, Human Capital Management, DCIS (observers)

Management Comments

Defense Human Resources Activity, Office of the Under Secretary of Defense for Personnel and Readiness



DEFENSE HUMAN RESOURCES ACTIVITY
HEADQUARTERS
4800 MARK CENTER DRIVE, SUITE 06J25-01
ALEXANDRIA, VA 22350-4000

MAR 19 2014

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Comments on Draft Combating Trafficking in Persons (CTIP) Program Review Report (Project No. D2009-DIP0E3-0260.000)

Thank you for the opportunity to provide comments on the draft report, "Evaluation of the Department of Defense Combating Trafficking in Persons Program," Project No. D2009-DIP0E3-0260.000, dated February 18, 2014.

Responses to the draft report's recommendations are included in Attachment 1. Also, in Attachment 2, are 44 recommended changes that we request be considered to provide a more accurate statement of the CTIP program within the Department. Lastly, provided in Attachment 3, for your consideration, are a list of initiatives and accomplishments that the CTIP Program Management Office has implemented during this report period.

Please direct any questions to [REDACTED]


Sharon H. Cooper
Director

Attachments:
As stated

Defense Human Resources Activity, Office of the Under Secretary of Defense for Personnel and Readiness (cont'd)

Attachment 1: Office of the Under Secretary of Defense For Personnel and Readiness (OUSD(P&R)) Comments to DoD IG Draft Report "Evaluation of the Department of Defense Combating Trafficking in Persons Program" (Project No. D2009-DIP0E3-0260.000)

Recommendations Requiring OUSD(P&R) Comment:

1) Under Secretary of Defense for Personnel and Readiness, publish updated Department of Defense Combating Trafficking in Persons guidance that:

1.a) Fully incorporates U.S. Government Combating Trafficking in Persons policy, taking into consideration Department of Defense Combating Trafficking in Persons Task Force findings.

OUSD(P&R) Response: Concur.

The reissuance of the DoD Instruction (DoDI) 2200.01, "Combating Trafficking in Persons (CTIP)," is under development to update the existing 2010 document. The updated DoDI takes into consideration DoD CTIP Task Force Findings, along with making many other key statutory and regulatory updates. The Instruction has been modified to incorporate the findings of this report and is being informally coordinated. Formal coordination is anticipated by May 2014.

1.b) Reinforce Department of Defense Component reporting requirements regarding CTIP metrics and relevant information.

OUSD(P&R) Response: Concur.

The updated DoDI will include a reporting matrix that reinforces reporting requirements and establishes clear procedures for reporting. The Defense Human Resources Activity also requests in the follow-up report the IG provide more details regarding what information is considered to be relevant.

1.c) Specifies, in detail, Combating Trafficking in Persons program elements for Department of Defense acquisition; investigation and law enforcement; operational planning; and training functions.

OUSD(P&R) Response: Concur.

New specific requirements for acquisition and law enforcement training will be added to DoDI 2200.01, as well as information for Joint Staff to include CTIP in operational plans and training functions.

1.d) Establishes a clear and comprehensive process for reporting trafficking in persons incidents and sharing information among appropriate Department of Defense organizations.

OUSD(P&R) Response: Concur.

Specific procedures for Trafficking in Persons (TIP) or TIP-related offense information will be added in the updated DoDI. TIP cases received by OUSD P&R will be disseminated to

Defense Human Resources Activity, Office of the Under Secretary of Defense for Personnel and Readiness (cont'd)

applicable including, contractors and requesting officials that are either directly involved with the offense or have a need to know. Additionally, coordination will occur with those agencies that may be able to provide additional information needed to answer queries concerning those offenses (e.g., Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (OUSD(AT&L))).

OUSD P&R will also include the disposition of criminal case information on DoD personnel for TIP or TIP-related offenses in the Attorney General Annual TIP Report to the Department of Justice (DoJ).

However, it is still the responsibility of the Military Services or Combatant Commands (COCOMs) to ensure that information on the results of criminal investigations on TIP or TIP related offenses is shared with the appropriate organizations under their command, including contractors.

2) Under Secretary of Defense for Personnel and Readiness, expand program monitoring by the Combating Trafficking in Persons Program Office to include a review of Department of Defense Component Combating Trafficking in Persons programs and assessments.

OUSD(P&R) Response: Non-Concur.

The updated DoDI directs that the Heads of Components conduct annual self-assessments and to report these results to the CTIP PMO. It is not the responsibility of the CTIP PMO to conduct each of these assessments. At the request of the CTIP PMO, component CTIP offices will provide program briefings and present their findings at the CTIP Task Force to share best practices with the other DoD components and applicable stakeholders.

3.a) Under Secretary of Defense for Personnel and Readiness, update Department of Defense Combating Trafficking in Persons policy to require combatant command joint plans, deployment orders, and other relevant documents to include Combating Trafficking in Persons guidance and information, where necessary.

OUSD(P&R) Response: Concur.

The reissued DoDI will require the Joint Staff to ensure COCOMs include CTIP in deployment orders, plans, and operations. The CTIP PMO met with the Joint Staff to discuss inclusion of CTIP in joint publications, exercises, and joint task force plans. The Joint Staff is a member of the CTIP Task Force and Core Planning Team responsible for implementing provisions in the CTIP Strategic Plan, which further addresses this issue.

4) Under Secretary of Defense for Personnel and Readiness:

4.a) Enforce Department of Defense Component compliance with the requirement to conduct annual Combating Trafficking in Persons awareness training for all Component members.

Defense Human Resources Activity, Office of the Under Secretary of Defense for Personnel and Readiness (cont'd)

OUSD(P&R) Response: Non-Concur.

In accordance with DoDI 2200.01, OUSD(P&R) “develop[s] overall guidance related to personnel policy issues for DoD CTIP.” Rather than enforcing compliance, the CTIP PMO “establishes policy and assigns responsibilities for CTIP.”

4.b) In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, implement the stated intent of the Deputy Secretary of Defense requiring Department of Defense contractors to complete annual Combating Trafficking in Persons training.

OUSD(P&R) Response: Concur.

We agree to work with the USD(AT&L) to require DoD contractors to complete annual CTIP training. The new DoDI will suggest that all contractors take the CTIP training as a term and condition of the contract.

4.c) In coordination with the Under Secretary of Defense for Acquisition, Technology, and Logistics, the director of the Joint Staff, and the secretaries of the military departments, develop and implement specialized Combating Trafficking in Persons training for commanders, legal counsel, strategic planners, and acquisition and contract management personnel.

OUSD(P&R) Response: Concur.

Specialized CTIP training currently exists for commanders in the form of leadership training, which has been available since 2008 on Joint Knowledge Online. We have asked DoJ to provide its training material on legal counsel. We will use their material to develop training for our Defense Staff Judge Advocates. We also have a Strategic Plan out for coordination to advise strategic planners on the inclusion of TIP in joint plans. We are finalizing training for acquisition and contract management personnel and this should be available by July 2014. However Acquisition training (developed by the Department of Homeland Security) has been available on the Defense Acquisition University website and the Federal Acquisition Institute websites since 2011.

Defense Procurement and Acquisition Policy, Office of the Under Secretary of Defense for Acquisition, Technology and Logistics



ACQUISITION,
TECHNOLOGY
AND LOGISTICS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

MAR 24 2014

MEMORANDUM FOR DEPUTY INSPECTOR GENERAL SPECIAL PLANS AND
OPERATIONS

THROUGH: DIRECTOR, ACQUISITION RESOURCES AND ANALYSIS

728
3/24/14

SUBJECT: Response to DoDIG Draft Report on Evaluation of the DoD Combating Trafficking
in Persons Program (Project No. D2009-DIP0E3-0260.000)

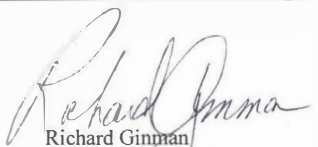
As requested, I am providing responses to the general content and recommendations
contained in the subject report.

Recommendation 4.b: Under Secretary of Defense for Acquisition, Technology and Logistics,
upon issuance of a DoD policy requirement for Department of Defense contractors to complete
annual Combating Trafficking in Persons training, request that the Defense Federal Acquisition
Regulation Supplement (DFARS) address this training requirement.

Response:

Concur. Consistent with the OUSD(P&R) recommendation by the DoDIG to implement the
stated intent of the Deputy Secretary of Defense requiring DoD contractors to complete annual
Combating Trafficking in Persons (CTIP) training, OUSD(AT&L)/DPAP will ensure the CTIP
contractor training requirement is put before the Defense Acquisition Regulations Council to
consider how best to implement in the DFARS.

Please contact [REDACTED] if
additional information is required.


Richard Ginman
Director, Defense Procurement
and Acquisition Policy

Vice Director, Joint Staff

JOINT STAFF ACTION PROCESSING FORM					
CLASSIFICATION UNCLASSIFIED					
EXTERNAL SUSPENSE 21 Mar 14		INTERNAL SUSPENSE 17 Mar 14		ACTION NUMBER 14-00785	
TO VDJS <i>ZSA 19 Mar 14</i>		THRU J5 COS //SIGNED// 19MAR14		THRU DDPS/TRP	
SUBJECT /O-DODIG-FA2/Evaluation of the DoD Combat Trafficking in Persons Program - Project No. D2009-DIPOE3-0260.000					
EXECUTIVE SUMMARY					
1. <u>Purpose</u>. To provide Inspector General of the Department of Defense (DoDIG) with Joint Staff coordination on its Evaluation of the DoD Combat Trafficking in Persons (CTIP) Program.¹ 2. <u>Issue</u>. DoDIG requests Joint Staff review and comment on observations and recommendations in draft report. The report may be revised based on comments received. 3. <u>Bottom Line</u>. The Joint Staff should concur and offer the attached comments for consideration. The comments matrix at Attachment A provides substantive input from U.S. Central Command. Attachment B provides generalized comments from U.S. Central Command, U. S. European Command, U.S. Africa Command, U.S. Southern Command, and U.S. Transportation Command. Attachments C and D document Defense Human Resources Activity Case Process Flow and the USCENTCOM CTIP Information Sheet for information. 4. <u>Background</u> a. DoDIG review of Departmental compliance with DoDI 2200.01, "CTIP" (15 September 2010) and CTIP program performance concluded that Joint Staff and Combatant Commands have not adequately addressed CTIP in operational and contingency plans. b. Three report recommendations for Joint Staff and Combatant Commands are to assess CTIP as part of routine operations, planning, and deployment; review joint plans, deployment orders, and post-conflict plans; and monitor implementation of CTIP policies during operations. c. Internal comments from the Joint Staff were submitted by J-5 and OCJCS/LC.					
COORDINATION					
NAME	AGENCY	DATE	NAME	AGENCY	DATE
w/cmnt	OCJCS/LC	5 Mar 14	w/cmnt	USCENTCOM	13 Mar 14
	J1	10 Mar 14	MG Bryan Watson w/cmnts	USAFRICOM	11 Mar 14
/no equity	J3	7 Mar 14	w/cmnt	USEUCOM	10 Mar 14
w/cmnt	J5/DDJSP	11 Mar 14	MG Anthony Crutchfield	USPACOM	13 Mar 14
Brig Gen Thomas	J7	10 Mar 14	MG Bennet Sacolick	USSOCOM	12 Mar 14
Maj Gen John Newell	USNORTHCOM	11 Mar 14	MG Gregory E. Couch w/cmnt	USTRANSCOM	14 Mar 14
w/cmnt	USSOUTHCOM	11 Mar 14		USSTRATCOM	6 Mar 14
AO;J/DIV;EXT				Date Prepared: 13 MAR 14	
CLASSIFICATION			CLASSIFICATION/DECLASSIFICATION INSTRUCTIONS		
UNCLASSIFIED					

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Vice Director, Joint Staff (cont'd)

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d. J-5/DDJSP "concurs and will implement thru the Joint Planning and Execution Community review process. CJCSI 3141.01E needs to reflect this during the next update. When OSD P&R updates DoDI 2200.01, J5/DDJSP will re-evaluate its processes."

e. OCJCS/LC states: "The DoD IG recommendations directly pertinent to Director, Joint Staff are 3.b.(1), (2), and (3). DoD IG correctly cites the overall authority for these recommendations as DoDI 2200.01, at Enclosure 2, paragraph 9. This USD(P&R) direction and assignment of duties to the Chairman is authoritative . . . Recommend J3 consider best means of accomplishing recommendation 3.b.(3) in conjunction with COCOMs, as it would involve real-time monitoring of CTIP implementation during ongoing military operations."

5. Recommendation. VDJS approve concurrence as stated in the bottom line.

Approve FSR 19 MAR 14 Disapprove _____ See Me _____
 FREDERICK S. RUDESHEIM
 Major General, USA
 Vice Director, Joint Staff

ENDNOTE

¹ 14-00785

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Acronyms and Abbreviations

CTIP	Combating Trafficking in Persons
DoD CTIP Instruction	Department of Defense Instruction 2200.01, "Combating Trafficking in Persons (CTIP)," February 16, 2007, revised September 15, 2010
FAR CTIP Clause	Federal Acquisition Regulation clause, 52.222-50, "Combating Trafficking in Persons"
TIP	Trafficking in Persons
U.S.C.	United States Code



Whistleblower Protection

U.S. DEPARTMENT OF DEFENSE

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

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