



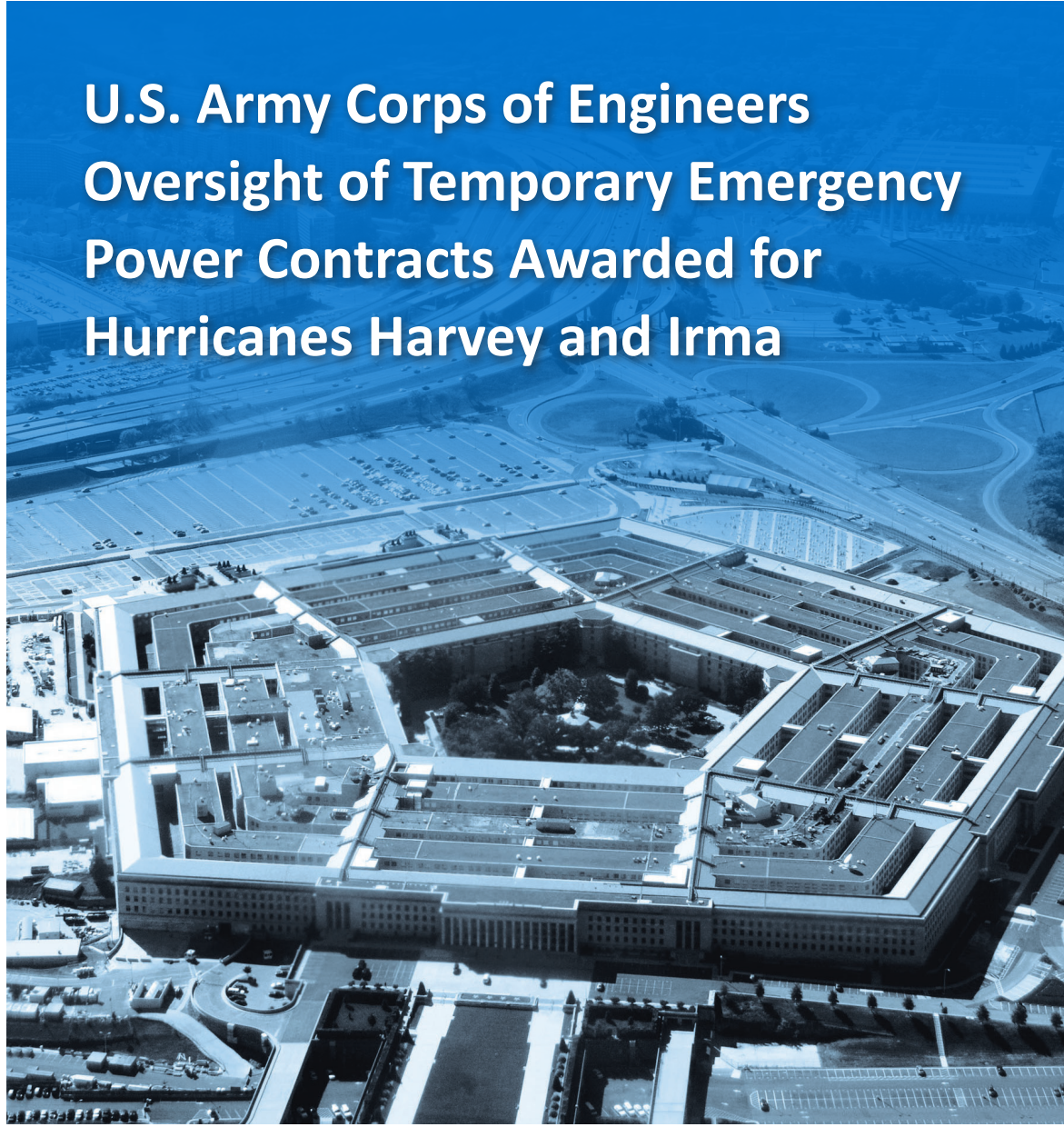
INSPECTOR GENERAL

U.S. Department of Defense

JANUARY 3, 2019



U.S. Army Corps of Engineers Oversight of Temporary Emergency Power Contracts Awarded for Hurricanes Harvey and Irma



INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE





Results in Brief

U.S. Army Corps of Engineers Oversight of Temporary Emergency Power Contracts Awarded for Hurricanes Harvey and Irma

January 3, 2019

Objective

We determined whether U.S. Army Corps of Engineers (USACE) Pittsburgh District properly monitored contractor performance on temporary emergency power contracts in accordance with applicable Federal and DoD contracting guidance for the disaster recovery response to Hurricanes Harvey and Irma.

Background

Three major hurricanes made landfall in Texas, Florida, Georgia, Puerto Rico, and the U.S. Virgin Islands during the 2017 hurricane season: Harvey, Irma, and Maria. Hurricanes Harvey and Irma marked the first time that two Atlantic Category 4 hurricanes made landfall in the continental United States in the same season. These storms affected roughly 19.8 million people and required USACE to provide temporary emergency power disaster relief assistance. USACE Pittsburgh District officials ordered temporary emergency power for recovery efforts for Hurricanes Harvey and Irma.¹

For incidents that require a coordinated Federal response, the Secretary of Homeland Security activates Emergency Support Function #3, "Public Works and Engineering Annex." This function facilitates the delivery of services, technical assistance,

Background (cont'd)

engineering expertise, construction management, and other support to prepare for, respond to, or recover from disaster or an incident requiring a coordinated Federal response. USACE is the primary agency responsible for coordinating activities involved in providing temporary emergency power to critical facilities under Emergency Support Function #3.

To expedite its response to emergencies and disasters, USACE developed and implemented Advanced Contracting Initiative contracts (ACI) for relief efforts. USACE officials award ACI contracts before disasters that allow USACE contracting personnel to respond when a disaster occurs by placing delivery orders at a negotiated rate for supplies and services. USACE used ACI contracts for temporary emergency power.

On October 1, 2013, and October 22, 2014, USACE Pittsburgh District contracting officials awarded three competitively bid firm-fixed-priced ACI contracts, two valued at \$100 million and the other valued at \$95 million, respectively, for temporary emergency power missions.

Finding

USACE oversight personnel did not properly monitor and assess contractor performance, in accordance with Federal and DoD contracting guidance, on three service contracts for temporary emergency power, valued at \$19 million, for disaster recovery in response to Hurricanes Harvey and Irma. We identified the following deficiencies.

- The contracting officer's representative (COR) for all three ACI contracts did not properly monitor or document his assessments of the contractors' performance and did not maintain required files documenting his oversight efforts. This occurred because, although the COR focused more on accomplishing the temporary emergency power mission, he did not verify that the contractors provided services according to contract requirements.

¹ USACE Pittsburgh District officials also ordered temporary emergency power for recovery efforts for Hurricane Maria. This report discusses contracts awarded for Hurricanes Harvey and Irma.



Results in Brief

U.S. Army Corps of Engineers Oversight of Temporary Emergency Power Contracts Awarded for Hurricanes Harvey and Irma

Finding (cont'd)

- USACE Planning and Response Team personnel did not document that they performed quality assurance procedures sufficient to demonstrate that the contractor performed contracted services at the standard specified in the performance work statement. This occurred because USACE Planning and Response Team personnel did not follow the quality assurance surveillance plan when performing quality assurance of the contractors.

As a result, USACE oversight personnel did not know whether the contractors complied with contract requirements and whether the Government received the services it paid \$19 million for from August to December 2017 to support temporary emergency power for Hurricanes Harvey and Irma.

Management Comments on the Finding and Our Response

The U.S. Army Corps of Engineers Commanding General commented on the finding. He stated that the magnitude of Hurricanes Harvey, Irma, and Maria is an important backdrop to understand the COR challenges in documenting oversight performed for three service contracts for temporary emergency power, valued at \$19 million. In total, the U.S. was impacted by 16 separate billion-dollar disaster events including 3 tropical cyclones, 8 severe storms, 2 inland floods, a crop freeze, drought and wildfire as reported by National Center for Environmental Information. The damage from Hurricanes Harvey, Irma, and Maria alone were responsible for approximately \$265 billion of the \$306 billion in 2017 weather and climate related disasters. However, as stated in this report, we discuss USACE personnel's oversight of contractor performance in response to Hurricanes Harvey and Irma, and not Maria.

Recommendations

We recommend that the U.S. Army Corps of Engineers Commanding General:

- Provide training to the COR responsible for temporary emergency power contracts on oversight responsibilities, emphasizing the importance of the responsibilities specified in the COR designation letter.
- Provide training to the procuring contracting officers of temporary emergency power contracts, emphasizing the importance of monitoring the performance of personnel assigned contracting officer's representative responsibilities.
- Direct contracting officials responsible for temporary emergency power Advanced Contracting Initiative contracts to update the quality assurance surveillance plan to include specific means for documenting daily quality assurance inspections.
- Require all personnel performing the quality assurance responsibilities for the temporary emergency power mission to receive appropriate contract quality assurance training.

Management Comments and Our Response

The USACE Commanding General agreed with our recommendations. The Commanding General agreed to have two additional trained CORs dedicated to Task Force Temporary Power by April 1, 2019, and in the interim, use CORs from other offices to assist in managing the temporary ACI contracts. In addition, the Commanding General stated that the contracting office is hiring a technical expert to perform the contracting officer responsibilities for temporary power missions.



Results in Brief

U.S. Army Corps of Engineers Oversight of Temporary Emergency Power Contracts Awarded for Hurricanes Harvey and Irma

Management Comments (cont'd)

The Commanding General also agreed to revise the quality assurance surveillance plan in February 2019, after the ACI contracts are awarded, to include specific means for documenting daily quality assurance assessments through contract modification by June 1, 2019. The Commanding General further agreed to develop both an online and on the job quality assurance curriculum and require all Quality Assurance personnel complete the training beginning in calendar year 2019.

The USACE Commanding General's comments met the intent of the four recommendations. Therefore, the recommendations are resolved, but will remain open. We will close the recommendations when we verify the actions are fully implemented, and we review the support for the planned or already completed actions.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Commanding General, U.S. Army Corps of Engineers	None	1.a, 1.b, 1.c, and 1.d	None

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

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



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

January 3, 2019

**MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION
AND SUSTAINMENT
COMMANDING GENERAL, U.S. ARMY CORPS OF ENGINEERS
AUDITOR GENERAL, DEPARTMENT OF THE ARMY**

**SUBJECT: U. S. Army Corps of Engineers Oversight of Temporary Emergency
Power Contracts Awarded for Hurricanes Harvey and Irma
(Report No. DODIG-2019-043)**

We are providing this report for your information and use. We conducted this audit in accordance with generally accepted government auditing standards.

We considered U.S. Army Corps of Engineers management comments on a draft of this report when preparing the final report. Comments from the Commanding General, U.S. Army Corp of Engineers conformed to the requirements of DoD Instruction 7650.02; therefore, we do not require additional comments.

We appreciate the courtesies extended to the staff. Please direct questions to Ms. Theresa Hull at (703) 604-9312 (DSN 664-9312).

A handwritten signature in cursive script, reading "Theresa Hull", is positioned above the printed name.

Theresa Hull
Assistant Inspector General
Acquisition, Contracting, and Sustainment

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Introduction

Objective

We determined whether U.S. Army Corps of Engineers (USACE) Pittsburgh District properly monitored and assessed contractor performance, in accordance with applicable Federal and DoD guidance, on temporary emergency power contracts for disaster recovery, in response to Hurricanes Harvey and Irma. See Appendix A for a discussion of scope and methodology, and Appendix B for prior audit coverage.

Background

The Council of the Inspectors General on Integrity and Efficiency is an independent entity established within the Executive branch to address integrity, economy, and effectiveness issues that transcend individual Government agencies. The Council of Inspectors General on Integrity and Efficiency Disaster Assistance Working Group committed to review disaster relief efforts across the U.S. Government. The DoD Office of Inspector General (OIG) participated in this initiative.

USACE

For incidents that require a coordinated Federal response, the Secretary of Homeland Security activates Emergency Support Function (ESF) #3, “Public Works and Engineering Annex,” to facilitate the preparedness for public works and engineering requirements. USACE is the primary agency responsible for coordinating activities involved in temporary emergency power to critical facilities under ESF #3.²

To expedite its response to emergencies and disasters, USACE developed and implemented Advanced Contracting Initiative (ACI) contracts for relief efforts. USACE officials award ACI contracts before disasters that allow USACE contracting personnel to respond when a disaster occurs by placing delivery orders at a negotiated rate for supplies and services. USACE used ACI contracts for temporary emergency power.

USACE Pittsburgh District

USACE Pittsburgh District’s mission is to provide expertise to help the region and the nation meet water resources development, environmental, and other engineering needs.³ USACE Pittsburgh District is responsible for solicitation,

² The ESFs provide the structure for coordinating Federal interagency support for a Federal response to an incident.

³ USACE Pittsburgh District’s boundaries are defined by the watershed basins for which it is responsible and include 26,000 square miles covering portions of western Pennsylvania, northern West Virginia, eastern Ohio, western Maryland and southwestern New York.

evaluation, award, and annual maintenance of ACI contracts for temporary emergency power.⁴ USACE Pittsburgh District typically issues mobilization task orders to contractors in support of the district responsible for executing the emergency power mission. Headquarters USACE directs USACE Pittsburgh District as the lead to execute all pre-declaration and no-notice declaration temporary emergency power mission assignments. After the President declares a major disaster, the district commander of the impacted area will decide whether contractor performance will continue on the task order issued by the Pittsburgh District or the impacted district will issue a new order to assume responsibility. After the event, a team consisting of Federal Emergency Management Agency (FEMA), state, and local government officials direct Emergency Power Planning and Response Teams (PRTs) to authorize the contractor to demobilize.

2017 Hurricane Season

Three major hurricanes made landfall in Texas, Florida, Georgia, Puerto Rico, and U.S. Virgin Islands during the 2017 hurricane season: Harvey, Irma, and Maria. Hurricanes Harvey and Irma marked the first time that two Atlantic Category 4 hurricanes made landfall in the continental United States in the same season. USACE Pittsburgh District officials stated that Hurricane Maria made landfall in Puerto Rico on September 20, 2017, leaving all 3.4 million residents without electricity. USACE Pittsburgh District officials ordered temporary emergency power for recovery efforts for Hurricanes Harvey and Irma.⁵

Hurricane Harvey

Hurricane Harvey made landfall on August 25, 2017, and set a record for the most rainfall from a U.S. tropical cyclone, with more than 50 inches of rain in some areas. The storm resulted in catastrophic flooding in Texas and western Louisiana, and caused an estimated \$125 billion of damage in the United States, according to the National Oceanic and Atmospheric Administration. From August 27, 2017, through September 20, 2017, USACE personnel oversaw contractors' installation of 45 generators in response to Hurricane Harvey.

Hurricane Irma

On September 5, 2017, and September 10, 2017, within 2 weeks of Hurricane Harvey, Hurricane Irma made landfall in Puerto Rico and Florida, respectively. Hurricane Irma became the strongest Atlantic Ocean hurricane on

⁴ Temporary emergency power refers to the installation and use of generators to provide power.

⁵ USACE Pittsburgh District officials also ordered temporary emergency power for recovery efforts for Hurricane Maria. USACE Pittsburgh District officials stated that USACE personnel oversaw the contractors' installation of generators at over 1,286 locations in response to Hurricane Maria for the temporary power mission assignment received on September 20, 2017. This report discusses the temporary emergency power contracts awarded for Hurricanes Harvey and Irma.

record, with winds peaking at 185 miles per hour, and remained a hurricane for 11 days. Hurricane Irma was the longest-lived Atlantic hurricane since Hurricane Ivan in 2004. According to the National Oceanic and Atmospheric Administration, Hurricane Irma caused at least \$50 billion of damage in the United States. From September 4, 2017, through September 24, 2017, USACE personnel oversaw contractors' installation of 42 generators in response to Hurricane Irma.⁶

Guidance

Disaster Relief and Emergency Assistance Guidance

The "Robert T. Stafford Disaster Relief and Emergency Assistance Act" (Stafford Act) and the 2016 National Response Framework (NRF) provide guidance for Government officials to use during emergencies. The Stafford Act authorizes the President to provide financial aid and other forms of assistance to support response, recovery, and mitigation efforts following declared disasters. Under the Stafford Act, USACE supports FEMA in carrying out the NRF, which calls on Federal departments and agencies to provide coordinated disaster relief and recovery operations to assist local agencies when local resources and capabilities are exceeded.

National Response Framework

The NRF guides the Nation's response to all types of disasters and emergencies. The NRF is always in effect, and elements can be implemented at any time. The NRF describes specific authorities and best practices for managing incidents that range from local emergencies to large-scale terrorist attacks or catastrophic natural disasters.⁷ The NRF describes the principles, roles and responsibilities, and coordinating structures for delivering the core capabilities required to respond to an incident and further describes how response efforts integrate with those of the other mission areas. The NRF provides structure for effective and efficient incident management among the Federal, state, and local emergency management agencies after a disaster. The NRF authorizes FEMA, part of the Department of Homeland Security, to issue mission assignments for executing ESFs. USACE is responsible for ESF #3.

⁶ The contractor installed 42 generators to facilities located in Lakeland and Homestead, Florida.

⁷ A catastrophic incident is any natural or manmade incident, including terrorism, which results in extraordinary levels of mass casualties, damage, or disruption severely affecting the population, infrastructure, environment, economy, national morale, or Government functions.

Emergency Support Function #3. USACE is the primary coordinator and agency responsible for ESF #3, “Public Works and Engineering Annex.” ESF #3 assists the Department of Homeland Security by coordinating and organizing Federal capabilities and resources to facilitate the delivery of services, technical assistance, engineering expertise, construction management, and other support to prepare for, respond to, or recover from a disaster or an incident requiring a coordinated Federal response.

ESF #3 is structured to provide public works and engineering-related support for the changing requirements of domestic incident management, including preparedness, response, and recovery actions. Activities within the scope of this function include:

- conducting pre-incident and post-incident assessments of public works and infrastructure;
- executing emergency contract support for life-saving and life-sustaining services;
- providing technical assistance to include engineering expertise, construction management, and contracting and real estate services;
- providing emergency repair of damaged public infrastructure and critical facilities; and
- executing emergency contracting support for infrastructure related to life-saving and life-sustaining services, such as providing potable water, emergency power, and other emergency commodities and services.

Advance Contracting Initiative Contracts

To expedite a response to emergencies and disasters, USACE developed and implemented ACI contracts for relief efforts. USACE officials award ACI contracts before disasters that allow USACE contracting personnel to respond when a disaster occurs by placing delivery orders at a negotiated rate for supplies and services. Each of the awarded contracts is specific to a state, geographical region, or territory of the United States, and contractors can begin mobilization within 24 hours of notification. Agencies meet actual needs by placing delivery orders against the ACI contracts.

Temporary Emergency Power Mission

On October 1, 2013, USACE Pittsburgh District contracting officials awarded two competitively bid firm-fixed-priced ACI contracts, W911WN-13-D-0006 and W911WN-13-D-0007, for temporary emergency power missions.⁸ The contracts were awarded for regions IV and V and regions VI, VII, and VIII,

⁸ A firm-fixed-priced contract uses a price that does not fluctuate with the contractor’s cost in performing the contract.

respectively.⁹ The contracts had a base period of 1 year with four 1-year options, and expired on September 30, 2018. In addition, on October 22, 2014, USACE Pittsburgh District contracting officials awarded one competitively bid firm-fixed priced ACI contract, W911WN-15-D-0001, for temporary emergency power missions. USACE awarded contract W911WN-15-D-0001 for areas outside the continental United States. This ACI contract had a base period of 1 year with four 1-year options, expiring October 21, 2019, if USACE contracting officials exercised all options. USACE Pittsburgh District issued task orders under the ACI firm-fixed-priced contracts for emergency temporary power following Hurricane Harvey, valued at \$7.2 million, and for emergency temporary power following Hurricane Irma, valued at \$12 million. Tables 1 and 2 show the ACI contract actions for temporary emergency power used in response to the 2017 hurricane season.

Table 1. Temporary Emergency Power ACI Contract Information

Hurricane	Contract No.	Base Contract Award Value	Obligated Value
Harvey	W911WN-13-D-0007	\$50,000,000	\$7,198,225
Irma	W911WN-13-D-0006	50,000,000	7,402,689
Irma	W911WN-15-D-0001*	95,000,000	4,646,600
Total		\$195,000,000	\$19,247,514

*Contract W911WN-15-D-0001 was a contract for temporary emergency power for OCONUS locations.

Source: The DoD OIG.

Table 2. Temporary Emergency Power ACI Task Order Information

Hurricane-Mission Location	Task Order No.	Task Order Award Value	Task Order Ceiling Amount	Obligated Value
Harvey-Texas	W911WN-17-F-3021	\$805,927	\$7,198,225	\$7,198,225
Irma-Florida	W911WN-17-F-3029	4,772,936	6,100,000	6,100,000
Irma-Georgia	W911WN-17-F-3030	1,302,689	N/A*	1,302,689
Irma-Puerto Rico	W911WN-17-F-3024	50,402	1,941,721	1,941,721
Irma-U.S. Virgin Islands	W911WN-17-F-3025	50,561	2,704,879	2,704,879
Total		\$6,982,515	\$17,944,825	\$19,247,514

*USACE issued modifications to task orders W911WN-17-F-3021, W911WN-17-F-3029, W911WN-17-F-3024, and W911WN-17-F-3025 to increase the ceiling amounts in response to mission requirements. USACE did not identify a ceiling amount for task order W911WN-17-F-3030 through modifications or on the task order.

Source: The DoD OIG.

⁹ The Federal Emergency Management Agency divides the United States and its territories into regions. Regions IV and V include Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee, Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. Regions VI, VII, and VIII include Arkansas, Louisiana, New Mexico, Oklahoma, Texas, Iowa, Kansas, Missouri, Nebraska, Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

Federal Acquisition Regulations

The Federal Acquisition Regulation (FAR) and the Defense Federal Acquisition Regulation Supplement (DFARS) identify procuring contracting officer (PCO) and contracting officer's representative (COR) responsibilities for monitoring contractor performance. The FAR requires that contracting officers include appropriate quality requirements in the contract and that contracting officers should maintain complete and accurate Government contract files. Specifically, the FAR and DFARS require the following.

- FAR Subpart 1.602-2, "Responsibilities," states that PCOs are responsible to ensure performance of all necessary actions for effective contracting and ensure compliance with the terms of the contracts. In addition, the DFARS requires that contracting officers designate a COR for all service contracts. The FAR states that PCOs must designate and authorize CORs in writing, CORs must be qualified in training and experience, and CORs must be certified and maintain certification.¹⁰
- FAR Subpart 4.8, "Government Contract Files," requires contracting offices to establish files that contain the records of all contractual actions. The FAR states quality assurance (QA) records are normally contained in a contract file if applicable. The documents in the contract file should provide a complete history of the transaction to support the basis for making informed decisions and actions taken, and to support reviews and investigations.
- FAR Part 46, "Quality Assurance," prescribes policies and procedures to ensure that supplies and services acquired under Government contract conform to the contract's quality and quantity requirements. Contracting officers are required to include appropriate requirements from the contractor's quality control plan and verify that the contractor fulfilled the contract quality requirements. For service contracts, the DFARS states that the contracting officer should prepare a quality assurance surveillance plan (QASP) to facilitate assessment of contractor performance.¹¹ The plan should specify all work requiring surveillance and the method of surveillance.

¹⁰ DFARS Procedures, Guidance, and Information Subpart 201.602-2, "Responsibilities," requires that contracting officers designate a COR for all service contracts.

¹¹ DFARS Part 246.401, "General."

DoD COR Handbook

The DoD COR Handbook, March 22, 2012, (COR Handbook) provides guidance to CORs to monitor contractor performance and provide the PCO with documentation that identifies the contractor's compliance or noncompliance with the terms and conditions of the contract.¹² The COR Handbook also states that the:

- COR must monitor contractor performance through the review of monthly reports, onsite visits, and surveillance review;
- COR can use the QASP as a guide to systematically and effectively monitor that the quality of services received comply with the terms and conditions of the contract;
- COR is required to maintain an individual COR file for each contract and document contractor performance; and
- PCO should review the COR reports for completeness and the COR file on a yearly basis and note any findings or recommended actions.¹³

USACE Acquisition Instruction

USACE Acquisition Instruction and Desk Guide, January 25, 2017, requires CORs to submit monthly status reports by the 15th of each month that cover the actions for the preceding 1-month period. The instruction further states that the PCO is required to ensure that the COR maintains contract documentation in the COR file and to conduct an annual review of the COR file.

Oversight Roles and Responsibilities

The PCO, the COR, the mission manager (MM), and the contract specialist were responsible for overseeing the contractor during the emergency temporary power mission for the three Hurricanes Harvey and Irma contracts.¹⁴ The contract QASP outlines the following roles and responsibilities of the Government surveillance team.

The contracting officer is responsible for:

- advising the Emergency Power Program Manager and MM on QASP development and use and appointing Power PRT personnel to serve as QA monitors;

¹² The COR Handbook provides relevant and comprehensive guidance on performance of COR functions. Information in the handbook is extracted from other authoritative sources, including the FAR, the DFARS, and DoD directives, instructions, publications, and policies. DFARS Procedures, Guidance, and Information subpart 201.602-2 refers to the COR Handbook for guidance on COR duties.

¹³ Revised in October 2015, DFARS Procedures, Guidance, and Information subpart 201.602-2 requires a contracting officer to, at a minimum, annually review the COR's files for accuracy and completeness.

¹⁴ The PCO performed the duties of an administrative contracting officer for all three contracts and the five associated task orders.

- providing advice for developing incentives and remedies, as appropriate, tied to performance objectives and performance thresholds; and
- maintaining contract file documentation of training provided by contracting personnel and approving all deductions in contractor earnings due to failure to provide the contracted level of service for this contract.

The Power PRT MM responsibilities include:

- performing as the lead for QA and recommending QA personnel for task order supporting mission execution; notifying the contracting officer of the selection or of any changes in QA status that would require changes to QA appointment and designation letters;
- certifying that the individual appointed as the QA possesses the necessary qualifications to perform the QA duties;
- evaluating and documenting contractor performance in accordance with the QASP;
- documenting and recommending relief to the contractor for not meeting performance requirements, based on situations outside the contractor's control;
- notifying the contracting officer of any significant performance deficiencies and providing recommendations to improve the QASP or performance work statement; and
- maintaining surveillance documentation and ensuring the completion of contractor performance assessment reports for all task orders.

The contract specialist assists the MM in issuing work orders, maintains contractual documents, and reviews the Daily Expenditure Report.

The logistics specialist is responsible for all operations at the staging area, tracking the departure and arrival of all assets to and from the staging area, and all property accountability. The QA assists the MM and QA supervisor to monitor and surveil the contractor and complete documentation of the contractor's performance. The QA supervisor organizes the QAs to ensure that all surveillance is accomplished during the rating period, coordinates with the MM on the recommendations for QA appointments, and maintains documentation of all surveillance done in a QA surveillance folder.

The QASP also states that the contractor is responsible for:

- complying fully with the terms and conditions of the contract;
- participating as a member of the Federal emergency power response team;
- maintaining and implementing a contractor quality control plan that complements the QASP;

- ensuring that nonconforming contract services are identified and corrected;
- tendering to the Government for acceptance only those services that conform to contract requirements; and
- recommending any changes to the contract that will provide more effective operations or eliminate unnecessary costs and ensuring current copies of all contractor Standard Operating Procedures and Quality Control Plan are onsite.

Review of Internal Controls

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

We identified internal control weaknesses. USACE oversight officials did not properly monitor and assess contractor performance on temporary emergency power task orders services in response to Hurricanes Harvey and Irma to verify contractors complied with the contracts. We will provide a copy of the final report to the senior official responsible for internal controls at USACE.

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

Finding

USACE Oversight Officials Should Strengthen Efforts to Monitor ACI Contractors' Performance for Temporary Emergency Power

USACE oversight personnel did not properly monitor and assess contractor performance, in accordance with Federal and DoD contracting guidance, on three services contracts for temporary emergency power valued at \$19 million for disaster recovery in response to Hurricanes Harvey and Irma. USACE contracting and PRT personnel did not monitor contractor performance in accordance with Federal and DoD acquisition requirements. We identified the following deficiencies.

- The COR for all three ACI contracts did not properly monitor or document his assessments of the contractors' performance and did not maintain required files documenting his oversight efforts.¹⁶ This occurred because, although the COR focused more on accomplishing the temporary emergency power mission, he did not verify that the contractors provided services according to contract requirements.
- USACE PRT personnel did not document that they performed QA procedures sufficient to demonstrate that the contractors performed contracted services at the standard specified in the performance work statement. This occurred because USACE PRT personnel did not follow the QASP when performing QA of the contractors.

As a result, USACE oversight personnel did not know whether the contractors complied with contract requirements and whether the Government received the services it paid \$19 million for from August to December 2017 to support temporary emergency power for Hurricanes Harvey and Irma.

Oversight Officials Did Not Adequately Monitor Contractor Performance

USACE personnel worked to accomplish the temporary emergency power mission following Hurricanes Harvey and Irma, overseeing contractors' installation of 42 temporary generators in 21 days after Hurricane Irma and the installation of 45 temporary generators in 25 days after Hurricane Harvey. However, USACE

¹⁶ We reviewed three service contracts and five associated task orders. Contract W911WN-13-D-0006 included task orders W911WN-17-F-3029 and W911WN-17-F-3030; contract W911WN-13-D-0007 included task order W911WN-17-F-3021; and contract W911WN-15-D-0001 included task orders W911WN-17-F-3024 and W911WN-17-F-3025. The COR's monitoring and documentation was improper because it was not in accordance with Federal and DoD acquisition guidance.

oversight personnel did not provide sufficient oversight to demonstrate that the contractors provided services to the standard specified in the performance work statements. Specifically, the COR for all three ACI contracts did not properly monitor or document his assessments of the contractors' performance and did not maintain required files documenting his oversight efforts. Additionally, USACE PRT personnel did not document that they performed QA procedures sufficient to demonstrate that the contractors performed contracted services as specified in the performance work statement.

The COR Did Not Monitor or Assess Contractor Performance

The COR did not adequately monitor the contractors' performance. In March 2015, the USACE Pittsburgh District contracting officer and the COR signed letters designating the COR to perform actions on behalf of the contracting officer for the three ACI contracts for temporary emergency power. The designation letters authorized the COR to:

- ensure that the contractor performed contract requirements in accordance with the contract terms, conditions, and specifications;
- ensure that inspections necessary to assure performance were conducted;
- prepare monthly reports concerning performance of services rendered under the contract; and
- maintain adequate records sufficient to describe the duties he performed.

The COR did not perform the tasks he was designated to perform for the three ACI contracts.

The COR Did Not Verify Contractor Performance

The COR did not verify that the contractors for Hurricanes Harvey and Irma performed technical requirements in accordance with the contract terms, conditions, and specifications. The COR stated that he communicated with the PRT MMs through e-mail and telephone on a daily basis to monitor contractor progress. However, the COR did not provide documentation demonstrating that the contractors performed contracted tasks at an acceptable level of performance. For example, the performance work statement required the contractor to depart the staging area to install generators within an hour of receiving a work order. However, the COR did not provide records or documentation to show that the contractors met this standard.

The COR Did Not Conduct Inspections

The COR did not visit the hurricane response sites to perform any direct oversight nor did he oversee PRT personnel to ensure that the inspections and oversight performed by the MMs and other PRT personnel were sufficient to ensure that the contractors met the standards specified in the contract. The COR stated that he relied on the PRT members to conduct QA inspections of the contractors' performance using QA checklists. The COR stated that he quickly reviewed the QA checklists for potential deficiencies, but did not review the checklists for completeness or accuracy. The COR did not provide documentation of his review of the QA checklists.

The COR Did Not Prepare Monthly Reports

The COR did not prepare monthly reports in accordance with the COR designation letter requirements. The designation letter required the COR to submit to the PCO a monthly report on performance of services rendered. However, the COR did not submit reports monthly or at the end of any of the missions. Without this information, USACE does not know whether the contractor's performance fulfilled the contract requirements and could overpay for services that the contractor provided that did not meet the contract terms.

The COR Did Not Maintain Required Documentation

The COR did not maintain required records to describe the duties he performed. The designation letter requires the COR to maintain records that sufficiently describe the duties he performed. The COR stated that he maintained direct liaison and communication with the PRT, the contractors, FEMA, and USACE through e-mails and daily phone calls known as Power Interagency Coordination Calls (PICC). The PICC served as a status report to discuss, among other topics, contractor movement, weather incidents, lodging arrangements, and generator status. The COR relied on the PICC and the PRT's observations to ensure that the contractors performed in accordance with the contract terms. However, the PICC notes did not discuss inspections performed to support whether the contractor performed contract requirements in accordance with the contract terms, conditions, and specifications and as a result were insufficient to meet the COR's responsibilities as identified in the COR designation letter.

The COR should document his oversight of the contractor because the documentation becomes the official record of the contractor's performance. Without documented records of the contractor's performance, contracting officials responsible for making future ACI contract awards will not have the details necessary to make an informed decision. Further, the PCO can use the oversight

documentation to address contractor deficiencies and to provide the annual assessment of the contractor's performance in the Contractor Performance Assessment Reporting System. The USACE PCO uses the Contractor Performance Assessment Reporting System ratings to determine whether a contractor should perform work on future task orders. In addition, Government personnel use the Contractor Performance Assessment Reporting System ratings to determine whether to award new contracts to that particular contractor.

The COR Did Not Use the Contracting Officers Representative Tracking Tool

The COR did not maintain the required documentation in the Contracting Officer Representative Tracking (CORT) Tool in accordance with DoD Instruction 5000.72.¹⁷ DoD Instruction 5000.72 and an Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics memorandum require CORs to maintain an electronic file in the CORT Tool for each assigned contract and include, at a minimum, completed surveillance documents.¹⁸ In 2015, USACE transitioned from the Virtual Contracting Enterprise-Contracting Officer's Representative Module web-based application to implement the DoD Instruction 5000.72 requirement for all DoD entities to use the CORT Tool. The Virtual Contracting Enterprise-Contracting Officer's Representative Module interfaced with the Standard Procurement System and other Army systems, adding the capability to notify contracting officials when the COR submitted COR Monthly Status Reports or when the reports were due. However, the CORT Tool did not interface with other Army electronic systems and did not identify missing COR status reports or notify the PCO or COR when COR monthly status reports are due.

The COR's supervisor and the PCO are responsible to ensure that CORs file monthly status reports in the CORT Tool. The PCO could have used the CORT Tool to monitor the COR's workload. The COR was assigned to multiple contracts and performed other duties. He stated that he was the emergency operations manager and delegated to be the COR for the contracts. Although DoD Instruction 5000.72 does not prohibit a COR from working on more than one contract, the instruction requires the contracting officer to ensure that individuals designated as CORs are able to dedicate sufficient time to perform adequate oversight on each designated contract.

¹⁷ DoD Instruction 5000.72, "DoD Standard for Contracting Officer's Representative (COR) Certification," March 26, 2015.

¹⁸ Under Secretary of Defense for Acquisition, Technology, and Logistics memorandum, "Update to the Department of Defense Contracting Officer Representative Tracking Tool," February 10, 2014.

The COR Did Not Document Contractor Surveillance

The COR did not maintain documents that detailed contractor surveillance, such as onsite contractor inspections or the contractor's quality control plan in his COR files, although he did maintain his designation letter, a QASP, and an annual file inspection checklist. The COR Handbook states, "It is important that the COR document everything related to the contract, contractor performance, and other related matters, including conversations and meetings with the contractor." In addition, the COR Handbook states that it is important for the COR to document the status of ongoing work, issues identified by the contractor and QA personnel, and corrective actions because this documentation will show whether the contractor performance was timely, work was within scope, and contractor-furnished materials and services complied with the contract terms and conditions.

The COR Did Not Perform Duties in Designation Letter

The COR did not properly monitor contractor performance to ensure that the contractor met contract standards because he was more concerned about accomplishing the emergency power mission and less concerned about accomplishing the duties assigned to him in the COR designation letters. On a daily basis, the COR communicated with PRT personnel and monitored the contractors' progress towards the installation of generators. However, the COR did not accomplish the duties he was assigned in the designation letters. The COR incorrectly stated that the designation letters that he signed were not related to the temporary power mission. The COR signed a designation letter for each of the three contracts that specified his responsibilities as a COR. USACE accomplishes the temporary emergency power mission using ACI contracts. Contractors performed the tasks of unloading, installing, maintaining, and uninstalling the power generators. USACE contracted with the contractors to perform these tasks at a specified performance level. The COR was responsible to ensure that the contractors provided services according to the contract standards.

In addition, the PCO should have done a better job of overseeing the COR. The FAR and the Army Regulation 70-13 state that the PCO is responsible for ensuring performance of all necessary actions for effective contracting, compliance with the terms of the contract, and safeguarding the interest of the United States in its contractual relationships.¹⁹ This includes, but is not limited to, maintaining the official contract file, appointing CORs, and conducting progress meetings with appointed oversight personnel. Army Regulation 70-13 states that the PCO

¹⁹ FAR Subpart 1.6, "Career Development, Contracting Authority, and Responsibilities," and Army Regulation 70-13, "Management and Oversight of Services Acquisition," July 2010, Chapters 2 through 4, "Contracting Officer."

will monitor the COR's performance during the contract to ensure that the COR's responsibilities and duties are performed. Additionally, DFARS procedures and the USACE Acquisition Instruction require the PCO to, at a minimum, annually review the COR's files for accuracy and completeness.²⁰ However, the USACE Pittsburgh District office CORT Tool files were missing various COR surveillance results and COR monthly reports, and the PCO did not review the CORT Tool files for accuracy or completeness.

QA Personnel Did Not Perform Complete QA Procedures

USACE personnel did not perform QA procedures that demonstrated that the contractors performed contracted services at the standard specified in the performance work statement as required by the FAR.²¹ The PCO prepared a contract performance work statement that identified 20 tasks that the contractor was expected to perform and the acceptable level of performance for each task.²² The FAR requires that Government personnel perform QA to determine whether the contractor provides services that conform to contract requirements and further states that QASPs should be prepared in conjunction with the statement of work. The FAR also requires contracting personnel to establish files that contain the records of all contractual actions, such as QA records, that will provide a complete history of the transaction to support the basis for making informed decisions, actions taken, and to support reviews and investigations.²³ USACE personnel QA efforts did not meet the FAR requirements.

PRTs Did Not Validate the Contractors' Performance

USACE PRT oversight personnel did not validate that the contractors provided services that met the standards specified in the performance work statement. The PRTs that oversaw the contractors' performance included USACE personnel from various USACE districts. To monitor the contracts, PRT personnel used documentation, such as QA checklists, daily expenditure reports, installation and de-installation work orders, daily work orders and status reports, site condition reports, and daily meetings with the contractors. However, the QA personnel used documents that did not provide enough information to support whether the contractors' performance met the performance work standards.

²⁰ DFARS Part 201.6-2, "Career Development, Contracting Authority, and Responsibilities."

²¹ FAR Subpart 46.4, "Government Contract Quality Assurance."

²² According to the QASP, the MM and PCO may adjust the standard based upon mission conditions.

²³ FAR Subpart 4.8, "Government Contract Files."

PRT personnel did not document that the contractors performed the 20 tasks identified in the performance work statement at an acceptable level. (See Appendix C for the 20 tasks.) The tasks included preparing the generators for use, installing the generators, maintaining the generators, fueling, and de-installing the generators. The tasks also included preparing accident reports, daily status reports, and customer complaints. However, USACE personnel did not demonstrate that PRT personnel documented QA supporting whether the contractors performed according to the contract requirements.²⁴ The following are examples of USACE personnel providing insufficient documentation of QA.

- USACE personnel did not document that the contractor installed generators according to the performance work statement. One of the contract performance standards for generator installation was that the generator must be installed at the facility with a confirmed report back (verbal or written) to the PRT within 30 minutes of completing the installation and a completed installation work order to the PRT within 6 hours of completing the installation. For the 46 generator installation work orders reviewed from task orders W911WN-17-F-3021 and W911WN-17-F-3029, the documents did not indicate the time and date that the contractor site manager confirmed the installation was complete, nor did they indicate the receipt of completed installation. The documentation indicated when the contractor installed the generators; however, the documents did not indicate when the contractor notified the PRT.
- USACE personnel did not provide support showing that the contractor met the contract requirement for de-installation. The contract standard for generator de-installation was that the generator must be de-installed, the facility connected to commercial power, and the generator returned to the staging area within 48 hours of receipt of the de-installation work order. For the 37 generator de-installation work orders reviewed for task orders W911WN-17-F-3021 and W911WN-17-F-3029, the documents did not show the time and date the contractor returned the generators to the staging area.
- USACE personnel did not provide supporting documentation that the contractor met the contract requirement for preventive maintenance. The contract standard for preventive maintenance was that the contractor should submit all preventive maintenance sheets to the PRT by 10 a.m. the day after the contractor performed the preventive maintenance. However, for 22 preventive maintenance sheets reviewed

²⁴ For Hurricanes Harvey and Irma, the contractors did not perform 5 of the 20 tasks because the conditions of the missions did not warrant a need for the tasks. For example, no accidents occurred, so the contractor did not prepare accident reports. In addition, the contractor did not perform some maintenance tasks because the generators were not onsite long enough to require maintenance.

for task order W911-WN-17-F-3029, the sheets did not indicate when the PRT received the preventive maintenance sheet. In addition, contracting personnel did not provide any preventive maintenance sheets for task order W911WN-17-F03021. As a result, contracting personnel could not demonstrate that the contractor met the performance standard for preventive maintenance.

QA Personnel Did Not Use a Surveillance Plan

USACE PRT personnel did not document that they performed QA procedures that demonstrated that the contractors completed contracted services at the standard specified in the performance work statement because USACE PRT personnel did not use the QASP when performing QA of the contractors. The PCO prepared a QASP that identified the methods and procedures Government personnel would use to ensure receipt of the services identified in the performance work statement. The QASP stated that the QA personnel would verify contractor compliance with designated performance objectives on a daily basis and document their findings. The QASP further stated that each PRT must maintain a surveillance folder that should include QA appointment letters, an approved QASP, and surveillance logs. USACE personnel did not maintain the required documentation. In addition, although the QASP identified forms for QA personnel to use to document surveillance, the forms did not collect enough information that contracting personnel could use to document whether the contractor performed the 20 tasks at the standard specified in the performance work statement. (See Appendix D for Quality Assurance Form.)

USACE PRT personnel did not maintain documentation showing that they verified contractor performance of the 20 tasks on a daily basis. Six of the MMs we interviewed stated that they were aware of a QASP but did not remember signing the QASP acknowledging receipt and providing a copy for the contracting file. We asked the MMs how they monitored contractor compliance for each of the 20 tasks identified in the QASP and how they documented their reviews. The MMs stated that they monitored performance and that the documentation should have been in Engineers Link Interactive or on a SharePoint site. However, USACE personnel did not provide documentation showing that PRT personnel surveilled contractor performance to the standards established in the contract performance work statement.

USACE PRT personnel did not use the QASP to ensure that the contractors accomplished the temporary emergency power mission according to contract specifications. Personnel from various USACE districts volunteered to be PRT members and several PRTs may perform oversight during a mission; however, the

PRTs performing QA did not receive training to perform contract QA. In addition, PRT members did not always complete documentation of their contractor oversight before returning to their home districts or send their contract documentation to the USACE Pittsburgh District office. As a result, the Government does not have records of all contractual actions, such as QA records, that provide a complete history of the transaction to support the basis for making informed decisions, actions taken, and to support reviews and investigations.

Risks of the Government Paying for Services not Received

USACE and contractor personnel worked diligently to accomplish the temporary emergency power mission when responding to Hurricanes Harvey and Irma. Contractor personnel responded to FEMA and local requests to install 87 temporary power generators. However, USACE personnel did not document that the contractors met contract performance standards while accomplishing the mission. As a result, the Government may have paid for a level of service that it did not receive. Better documentation of the contractor services provided in response to a major hurricane would benefit USACE and FEMA when establishing standards of performance and the associated costs on future ACI contracts.

Management Comments on the Finding and Our Response

U.S. Army Corps of Engineers Comments

The U.S. Army Corps of Engineers Commanding General commented on the finding. He stated that the magnitude of Hurricanes Harvey, Irma, and Maria is an important backdrop to understand the COR challenges in documenting oversight performed for three service contracts for temporary emergency power, valued at \$19 million.

The Commanding General stated that given the enormity of the nation's historic year of weather and climate disasters, it is important to place this audit in proper context. In total, the U.S. was impacted by 16 separate billion-dollar disaster events including 3 tropical cyclones, 8 severe storms, 2 inland floods, a crop freeze, drought and wildfire as reported by National Center for Environmental Information. The damage from Hurricanes Harvey, Irma, and Maria alone were responsible for approximately \$265 billion of the \$306 billion in 2017 weather and climate related disasters. Each of these destructive hurricanes join Hurricanes Katrina and Sandy, in the new top five costliest U.S hurricanes on record. USACE is funded to train an approximately 1,500 voluntary disaster

response force. USACE responded to 32 events with nearly 6,000 deployments. USACE installed over 2,400 generators for Temporary Emergency Power in Texas, Florida, Puerto Rico, and United States Virgin Islands. To respond to this unprecedented demand for emergency response missions, USACE assumed calculated risk to mitigate shortfalls and provided just-in-time training to save lives and restore life-sustaining infrastructure.

The Commanding General stated he is proud of USACE's extraordinary efforts in providing emergency power to critical facilities and to the 19.8 million people impacted by 2017 hurricanes. He also stated that he values the DoD OIG work as USACE improves how it better complies with Federal and DoD contracting guidance during unique disaster responses. USACE understands the importance of adequately documenting its monitoring to demonstrate accountability while it turns on the power for millions of people.

Our Response

We appreciate the Commanding General's comments. The Commanding General cites the challenges in providing oversight for three service contracts in response to Hurricanes Harvey, Irma, and Maria in addition to the many other natural disasters that occurred during the year. However, this report discusses USACE personnel's oversight of contractor performance in response to Hurricanes Harvey and Irma, and not Maria. During the audit, we learned that the effort to restore power to regions affected by Hurricane Maria was ongoing and decided to remove Hurricane Maria from our review to ensure that the audit did not disrupt USACE's response efforts.

We agree that USACE executed a large response to the three hurricanes, installing 2,400 generators for Temporary Emergency Power in Texas, Florida, Puerto Rico, and United States Virgin Islands. However, the majority of that effort occurred in response to Hurricane Maria, which occurred after Hurricanes Harvey and Irma. Fewer than 100 of the 2,400 generators were installed in response to Hurricanes Harvey and Irma. USACE personnel oversaw contractors' installation of 45 generators in response to Hurricane Harvey during the period August 27, 2017 through September 20, 2017, and 42 generators in response to Hurricane Irma during the period September 4, 2017, through September 24, 2017. Hurricane Maria made landfall in Puerto Rico on September 20, 2017.

The report acknowledges that USACE and contractor personnel worked diligently to accomplish the temporary emergency power mission when responding to Hurricanes Harvey and Irma. However, USACE personnel did not oversee the contractor to ensure that the contractors met contract performance standards while accomplishing the mission on three contracts valued at \$19 million.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend the U.S. Army Corps of Engineers Commanding General:

- a. **Provide training for the contracting officer's representative on performing the duties for contractor oversight on temporary emergency power contracts to include documenting contractor performance and contracting officer's representative oversight efforts as specified in the contracting officer's representative designation letter.**

U.S. Army Corps of Engineers Comments

The U.S. Army Corps of Engineers Commanding General, agreed with the recommendation and stated that during Hurricanes Harvey and Irma, the Contracting Officer's Representative (COR) had insufficient time to complete each task associated with COR duties because of staffing limitations and the high demand for Task Force Temporary Emergency Power. The Commanding General stated that he recognizes the importance of the COR's duties and that the Pittsburgh District will have two additional trained CORs dedicated to Task Force Temporary Emergency Power by April 1, 2019, and in the interim, the Pittsburgh District is using CORs from other offices to assist in managing the temporary Advanced Contracting Initiative (ACI) contracts.

Our Response

The USACE Commanding General's comments met the intent of the recommendation; therefore, the recommendation is resolved, but will remain open. We will close this recommendation when we obtain evidence to verify that two additional CORs dedicated to the Task Force Temporary Emergency Power have been assigned to the Pittsburgh District and that all USACE personnel designated to perform COR duties on temporary power ACI contracts have completed training that includes oversight responsibilities emphasizing the responsibilities specified in the COR designation letter.

- b. Provide training to the procuring contracting officer on monitoring the performance of personnel designated for contracting officer's representative responsibilities on emergency temporary power contracts.**

U.S. Army Corps of Engineers Comments

The U.S. Army Corps of Engineers Commanding General agreed with the recommendation and stated that the Procuring Contracting Officer (PCO) took immediate action and reviewed all necessary regulations related to COR appointment and training as an informal training method. In addition, the contracting office addressed this issue by initially obtaining assistance from another district and then hiring a technical expert to perform the contracting officer responsibilities for temporary power missions.

Our Response

The USACE Commanding General's comments met the intent of the recommendation; therefore, the recommendation is resolved but will remain open. We disagree that the PCOs informal training consisting of reviewing regulations related to COR appointment and training sufficiently addressed the recommendation. However, the additional action of hiring a GS-13 technical expert to take over contracting officer responsibilities for temporary power missions in addition to obtaining assistance from another district sufficiently satisfies the recommendation. We will close the recommendation after we obtain evidence to verify that a GS-13 technical expert was hired as the contracting officer for the temporary power missions.

- c. Direct contracting officials responsible for emergency temporary power Advanced Contracting Initiative contracts to update the quality assurance surveillance plan to include specific means for documenting daily quality assurance assessments.**

U.S. Army Corps of Engineers Comments

The U.S. Army Corps of Engineers Commanding General agreed with the recommendation and stated that USACE plans to award temporary power ACI contracts in February 2019 and to revise the quality assurance surveillance plan post-award through contract modification by June 1, 2019.

Our Response

The USACE Commanding General's comments met the intent of the recommendation; therefore, the recommendation is resolved but will remain open. We will close this recommendation after we obtain evidence to verify that all ACI contracts awarded for temporary power include a revised quality assurance surveillance plan that includes specific means for documenting daily quality assurance assessments has been completed for all ACI contracts for emergency temporary power awarded by USACE.

- d. Ensure that all personnel performing the quality assurance responsibilities for the temporary emergency power mission receive appropriate contract quality assurance training emphasizing the importance of properly documenting their quality assurance inspections.**

U.S. Army Corps of Engineers Comments

The U.S. Army Corps of Engineers Commanding General agreed with the recommendation and stated that USACE will develop both an online and on the job quality assurance curriculum and require all Quality Assurance (QA) personnel complete the training. Beginning in calendar year 2019, the curriculum will be included in the online USACE Level II Emergency Power Training. All Planning and Response Team (PRT) members are required to complete Level II training and by including the QA training, this will ensure that PRT members receive the training, which will further improve the PRT effectiveness.

Our Response

The Commanding General's comments addressed all of the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close this recommendation when we obtain evidence to verify that the QA curriculum has been developed and implemented both on the job and online in the USACE Level II Emergency Power Training and all PRT members have completed the training.

Appendix A

Scope and Methodology

We conducted this performance audit from January through October 2018 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.

Revised Announced Audit Objective

We queried the Federal Procurement Data System–Next Generation, as of December 20, 2017, to determine the universe of contracts awarded for the three major hurricanes. Using this data, we selected a nonstatistical sample of contracts for temporary emergency power from USACE contracting offices that awarded the highest dollar value of contracts. USACE Pittsburgh awarded \$196 million in contracts for temporary emergency power. During the audit, we learned that the effort to restore power to regions affected by Hurricane Maria was ongoing and decided to remove Hurricane Maria from our review to ensure that the audit did not disrupt USACE’s efforts. We reviewed contract oversight documentation and interviewed USACE officials about procedures to monitor contractor performance for Hurricanes Harvey and Irma.

Announced Audit Objective

The announced audit objective on January 10, 2018, was to determine whether the U.S. Army Corps of Engineers properly awarded and administered emergency power contracts for disaster recovery in response to the 2017 hurricane season.

Revised Audit Objective

Our revised objective is to determine whether the U.S. Army Corps of Engineers Pittsburgh District properly monitored and assessed contractor performance in accordance with applicable Federal and DoD guidance on temporary emergency power contracts for disaster recovery, in response to Hurricanes Harvey and Irma.

Criteria and Guidance Reviewed

We obtained and reviewed the following relevant criteria and guidance from the United States Code, and Federal, DoD, Army, and USACE regulations and policies.

- Public Law 93-288, “Robert T. Stafford Disaster Relief and Emergency Assistance Act” (Stafford Act), as amended August 2016

- Public Law 115-56, “Continuing Appropriations Act, 2018 and Supplemental Appropriations for Disaster Relief Requirements Act, 2017”
- FAR Subpart 1.602-2, “Responsibilities”
- FAR Subpart 4.8, “Government Contract Files”
- FAR Subpart 37.604, “Quality Assurance Surveillance Plans”
- FAR Subpart 46.4, “Government Contract Quality Assurance”
- “Department of Defense COR Handbook,” March 22, 2012
- DFARS Part 201.602, “Contracting Officers”
- Department of Homeland Security, “National Response Framework,” June 2016
- U.S. Army Regulation, 70-13, “Management and Oversight of Service Acquisitions,” July 30, 2010
- “USACE Acquisition Instruction and Desk Guide,” January 25, 2017

Review of Documentation and Interviews

We interviewed USACE QA and contracting personnel from the Pittsburgh, Walla Walla, Savannah, Tulsa, and Jacksonville District offices to obtain an understanding of USACE’s contracting process and contract oversight procedures, including the:

- PCO and COR for the temporary emergency power contracts;
- members of the PRT, including the MMs, a contract specialist, and a logistics specialist;
- emergency operations manager; and
- emergency management specialists.

On October 1, 2013, USACE Pittsburgh District contracting officials awarded two competitively bid firm-fixed-priced ACI contracts, W911WN-13-D-0006 and W911WN-13-D-0007, for temporary emergency power missions.

The contracts had a base period of 1 year with four 1-year options, which expired on September 30, 2018. In addition, on October 22, 2014, USACE Pittsburgh District contracting officials awarded one competitively bid firm-fixed-priced ACI contract, W911WN-15-D-0001, for temporary emergency power missions. USACE awarded contract W911WN-15-D-0001 for areas outside the continental United States. This ACI contract had a base period of 1 year with four 1-year options, expiring October 21, 2019, if USACE contracting officials exercised all options. USACE Pittsburgh District issued task orders under the

ACI firm-fixed priced contracts for emergency temporary power following Hurricane Harvey, valued at \$7.2 million, and for emergency temporary power following Hurricane Irma, valued at \$12 million.

We accessed the Paperless Contract File system to download the contract files for contracts W911WN-13-D-0006, W911WN-13-D-0007, and W911WN-15-D-0001. Specifically, we reviewed task orders W911WN-17-F-3021, W911WN-17-F-3029, W911WN-17-F-3030, W911WN-17-F-3024, and W911WN-17-F-3025 totaling \$19.2 million. In addition, through interviews with USACE personnel, we obtained various oversight documents that the COR and PRT used to monitor the contractors' performance. We obtained and analyzed the following documentation.

- QASP for contracts W911WN-13-D-0006, W911WN-13-D-0007, and W911WN-15-D-0001
- COR designation letters
- QA checklists
- Daily expenditure reports
- Installation and de-installation work orders
- Daily work order status reports
- Site condition reports
- Preventive maintenance reports

We visited USACE Headquarters, USACE Pittsburgh District office, and interviewed the contracting chief (PCO), emergency management specialist (COR), MM, and contract specialist to discuss their processes to monitor contractor performance. We also interviewed the emergency operations manager, Temporary Emergency Power project manager, Readiness Office chief, and internal review chief to discuss their processes to monitor contractors' quality controls.

Use of Computer-Processed Data

We did not use computer-processed data that supported our findings, conclusions, and recommendations to perform the audit.

Appendix B

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO) and the DoD Office of Inspector General (DoD OIG) issued 11 reports discussing contracts for disaster relief efforts. Unrestricted GAO reports can be accessed at <http://www.gao.gov>. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/reports.html/>. Unrestricted Army Audit Agency reports can be accessed from .mil and gao.gov domains at <https://www.aaa.army.mil/>. Naval Audit Service reports are not available over the Internet. Unrestricted Air Force Audit Agency reports can be accessed from <https://www.efoia.af.mil/palMain.aspx> by clicking on Freedom of Information Act Reading Room and then selecting audit reports.

GAO

Report No. GAO-18-472, “2017 Hurricanes and Wildfires: Initial Observations on the Federal Response and Key Recovery Challenges,” September 2018

The GAO found that Federal and state preparedness and coordination efforts prior to and after the 2017 hurricane and wildfire disasters facilitated the response in Texas, Florida, and California. The U.S. Government provided significant support to Puerto Rico and the U.S. Virgin Islands in response to Hurricanes Irma and Maria, but faced numerous challenges that complicated response efforts.

Report No. GAO-18-335, “2017 Disaster Contracting: Observations on Federal Contracting for Response and Recovery Efforts,” February 2018

The GAO found that, as of December 31, 2017, 19 Federal agencies had entered into contracts and obligated over \$5.6 billion on those contracts to support efforts related to Hurricanes Harvey, Irma, and Maria. The Department of Homeland Security, including FEMA and DoD Components (including USACE), accounted for approximately 97 percent of those obligations.

Report No. GAO-17-20, “DOT Discretionary Grants: Problems with Hurricane Sandy Transit Grant Selection Process Highlight the Need for Additional Accountability,” December 2016

The GAO found that the Federal Transit Administration evaluated and selected Hurricane Sandy transit resilience projects for award based on a multi-step process, but did not take sufficient steps to ensure that the process was consistent or appropriately documented.

Report No. GAO-16-476, "Disaster Recovery: FEMA Needs to Assess Its Effectiveness in Implementing the National Disaster Recovery Framework," May 2016

The GAO found that FEMA took action to promote state adoption of the National Disaster Recovery Framework. However, officials in four of the five states GAO the reviewed said that they did not understand aspects of the National Disaster Recovery Framework, including how it related to other FEMA disaster programs and the level of Federal technical assistance available.

Report No. GAO-16-87, "Disaster Response: FEMA Has Made Progress Implementing Key Programs, but Opportunities for Improvement Exist," February 2016

The GAO found that FEMA had taken steps to implement, address, and improve select disaster programs, but the GAO identified opportunities to strengthen program management.

Report No. GAO-15-783, "Disaster Contracting: FEMA Needs to Cohesively Manage Its Workforce and Fully Address Post-Katrina Reforms," September 2015

The GAO found that FEMA had not fully implemented the 2006 Post-Katrina Emergency Management Reform Act contracting reforms due, in part, to incomplete guidance.

Report No. GAO-14- 512, "Emergency Transportation Relief: Agencies Could Improve Collaboration Begun during Hurricane Sandy Response," May 2014

The GAO addressed the Department of Transportation's progress in allocating, obligating, and disbursing Disaster Relief Appropriations Act of 2013 surface transportation funds; how the Federal Transit Administration's new Public Transportation Emergency Relief program compares to the FEMA and the Federal Highway Administration's emergency relief programs; and the extent to which Federal Transit Administration and FEMA have implemented their memorandum of agreement to coordinate their roles and responsibilities when providing assistance to transit agencies.

Report No. GAO-15-15, "Hurricane Sandy: FEMA Has Improved Disaster Aid Verification but Could Act to Further Limit Improper Assistance," December 2014

The GAO found that FEMA improved its ability to detect improper and potentially fraudulent payments by implementing new controls, but there were continued weaknesses in the agency's validation of Social Security numbers, among other things.

Report No. GAO-15-515, “Hurricane Sandy: An Investment Strategy Could Help the Federal Government Enhance National Resilience for Future Disasters,” July 2015

The GAO report addressed how agencies used Federal recovery funds to enhance resilience; the extent to which states and localities were able to maximize Federal funding to enhance resilience; and actions that could enhance resilience for future disasters.

Report No. GAO-14- 58, “Hurricane Sandy Relief: Improved Guidance on Designing Internal Control Plans Could Enhance Oversight of Disaster Funding,” November 2013

The GAO found that agencies prepared Hurricane Sandy disaster relief internal controls plans based on Office of Management and Budget guidance but did not consistently apply the guidance in preparing these plans in response to the Disaster Relief Appropriations Act of 2013.

DoD OIG

Report No. DODIG-2016-028, “U.S. Army Corps of Engineers, New York District Monitoring of a Hurricane Sandy Contract Needs Improvement,” December 3, 2015

The DoD OIG found that CORs from USACE New York District effectively monitored two of the three contracts reviewed for Hurricane Sandy. The COR did not conduct the surveillance necessary to monitor and document the contractor’s performance for the remaining contract. The PCO did not review COR documentation or oversee the COR’s efforts to monitor contractor performance, as required by the FAR.

Report No. DODIG-2013-102, “Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies,” July 1, 2013

The DoD OIG found that National Guard Bureau officials did not always ensure that interoperable communications equipment was available, maintained, staffed, or ready for use during a domestic emergency. These conditions occurred because National Guard Bureau officials did not have adequate oversight of Joint Incident Site Communications Capability systems provided to National Guard units.

Appendix C

Quality Assurance on Performance Work Statement Tasks

Task	Standard	Verification	Frequency of Surveillance	Result if Standard is Not Met	Documentation of Quality Review for Hurricane Harvey	Documentation of Quality Review for Hurricane Irma
Mobilization of Assets	All assets completed mobilization	All assets have reported to the Contractor Site Manager and PRT at the staging area	At time of mobilization	Any asset (personnel, equipment, and mobilization) will not be paid for that day	Yes	Yes
Off-Loading Generators	Off-loading generators within 30 minutes of receipt of a work order at a rate of 40 generators off-loaded and staged per shift	PRT and contract personnel verify start and status from contractor upon completion of work order	As each work order is issued by PRT	Material handling equipment and associated operator(s) will not be paid for that day	No	No
Preparing Generators	Start prepping generators within 30 minutes of receipt of a work order at a rate of 30 generators prepped per shift	PRT and contractor personnel verify start and status from contractor upon completion of the work order	As each work order is issued by PRT	Assets required for prepping generators per the contractor's Standard Operating Procedures will not be paid for that day	No	No
Pre-Installation Inspections	PII Team must depart for facility within 1 hour of receipt of a work order; PII results reported to PRT within 1 hour after completion of the PII	PRT and contractor personnel verify departure of PII Team; PII documentation submitted to PRT	As each work order is issued by PRT	PII Team and associated vehicle not paid for that day	Not Applicable	Not Applicable

See final page of Appendix C for the table notes.

Quality Assurance on Performance Work Statement Tasks (cont'd)

Task	Standard	Verification	Frequency of Surveillance	Result if Standard is Not Met	Documentation of Quality Review for Hurricane Harvey	Documentation of Quality Review for Hurricane Irma
Site Condition Reports	Contractor must submit Site Condition Report (SCR) with completed installation and de-installation work orders	Receipt of report by PRT	As each work order is issued by PRT	First discrepancy is memorandum of record; second and additional discrepancies result in non-payment of the Contractor Site Manager for that day	No	No
Installing Generators	Assigned generator must depart staging area within 1 hour of receipt of an installation work order	PRT and contractor personnel verify departure of generator from staging area	As each work order is issued by PRT	Truck driver and hauling equipment associated with the generator installation will not be paid for that day	No	No
Installing Generators	Generator must be installed at facility with a confirmed report back (verbal or written) to the PRT within 30 minutes of completing installation	Contractor Site Manager confirms installation is complete and informs PRT	As each work order is issued by PRT	Install team (electricians and trucks) will not be paid for that day	No	No
Installing Generators	Completed installation work order provided to PRT within 6 hours completing installation	Receipt of completed installation work order by PRT	Visit installed generator every other day	First discrepancy is memorandum of record; second and additional discrepancies result in non-payment of the Contractor Site Manager for that day	No	No

See final page of Appendix C for the table notes.

Quality Assurance on Performance Work Statement Tasks (cont'd)

Task	Standard	Verification	Frequency of Surveillance	Result if Standard is Not Met	Documentation of Quality Review for Hurricane Harvey	Documentation of Quality Review for Hurricane Irma
Fueling Generators	Generators must not run out of fuel	Contractor Quality Control (QC), PRT Quality Assurance (QA), Preventive Maintenance (PM) Team and/or feedback from the facility operator	Observe 75 percent of all initial services, then verify each following service is completed one day afterwards	Fuel truck driver and associated vehicle will not be paid for that day	No	No
Servicing Generators	Generators must be serviced every 240 operational hours (between 216 and 264 operational hours)	Contractor QC, PRT QA, PM Team	As each work order is issued by PRT	Servicing the generator, although ultimately done by the contractor, will not be paid	Not Applicable	Not Applicable
Repairing Generators	Contractor must mobilize a team to assess generator status within 1 hour of receipt of a work order	Contractor QC, PRT QA, PM Team and/or feedback from the facility operator	QA verifies PM being performed at installed generators every third day during installation	First discrepancy is memorandum of record; second and additional discrepancies result in non-payment of the electrician, mechanic and associated vehicles	Not Applicable	Not Applicable
Replacing Not Mission Capable Generators at a Facility	Follow guidance for hauling and installing generator as listed above	Contracts did not specify a verification method	As each work order is issued by PRT	Contracts did not specify a result if standard was not met	Not Applicable	Not Applicable
Preventive Maintenance	Each installed generator must be visited daily by the PM Team per the contractor's submitted schedule	Contractor QC, PRT QA and submittal of PM Sheet to PRT by 10 a.m. the following day	As each work order is issued by PRT	Not completing PM will result in non-payment of the PM team for that day	No	No

See final page of Appendix C for the table notes.

Quality Assurance on Performance Work Statement Tasks (cont'd)

Task	Standard	Verification	Frequency of Surveillance	Result if Standard is Not Met	Documentation of Quality Review for Hurricane Harvey	Documentation of Quality Review for Hurricane Irma
De-Installing Generators	Generator must be de-installed, facility connected to commercial power, and generator returned to the staging area within 48 hours of receipt of the de-installation work order	PRT and contractor personnel verify arrival of the de-installed generator from the facility to the staging area	As each work order is issued by PRT	Truck driver and hauling equipment associated with the generator de-installation will not be paid for the day	No	No
Return to Storage	RTS activities must start within 1 hour of receipt of a work order at a rate of 20 generators per shift	PRT and contractor personnel verify start and completion rate of RTS activities	Daily receipt of reports	Mechanic, laborer and associated vehicles will not be paid for that day	No	No
De-mobilization of assets	Identified Contractor assets shall be in de-mobilization status upon notice of a work order	Contractor Site Manager verifies assets have begun demobilization	Each daily	Personnel and equipment will not be paid for days/ shifts beyond the one shift allotted for de-mobilization	No	No
Preventive Maintenance Sheets	All PM Sheets must be submitted to the PRT by 10 a.m. the following day	Receipt of PM Sheets by the PRT	As each work order is issued by PRT	First discrepancy is memorandum of record; second and additional discrepancies result in non-payment of the Contractor Site Manager for that day	No	No

See final page of Appendix C for the table notes.

Quality Assurance on Performance Work Statement Tasks (cont'd)

Task	Standard	Verification	Frequency of Surveillance	Result if Standard is Not Met	Documentation of Quality Review for Hurricane Harvey	Documentation of Quality Review for Hurricane Irma
Daily Expenditure Report	Contractor must submit the DER report to the PRT MM, CS, and KO by 10 a.m. each day	Receipt of report by PRT MM, CS and KO	As any damage occurs	First discrepancy is memorandum of record; second and additional discrepancies result in non-payment of the Contractor Site Manager for that day	No	No
Damage Report	Contractor must provide initial report (verbal or written) of damage of generators, facilities, etc. to PRT MM and KO within 1 hour of incident	Receipt of report by PRT MM, CS and KO	As any accident occurs	First discrepancy is memo of record; second and additional discrepancies result in non-payment of the Contractor Site Manager for that day	Not Applicable	Not Applicable
Accident Report	Contractor must provide initial report (verbal or written) of any accident to the PRT MM and KO within 1 hour of incident	Receipt of report by PRT MM, CS and KO	As any accident occurs	Non-payment of Contractor Site Manager for that day	Not Applicable	Not Applicable

Acronyms

CS Contracting Specialist	MM Mission Manager	PRT Planning and Response Team	RTS Return to Storage
DER Daily Expenditure Report	PII Pre-Installation Inspections	QA Quality Assurance	SCR Site Condition Report
KO Contracting Officer	PM Preventive Maintenance	QC Quality Control	

Appendix D

Quality Assurance Form

(Attachment 2)

GENERATOR QA CHECKLIST

US Army Corps of Engineers

Power Response Team

Mission # _____

Date _____

Facility Name _____

GPS Location _____

Address _____

_____ N

City _____ State _____

Zip _____ W

POC _____

Installed by _____

POC/Facility Phone Number _____

_____ PP _____ CONTRACTOR

Generator Information

Bar Code # _____ Size _____ kW _____ Volts

Manufacturer _____ Meter Reading _____ hours

Circuit Breaker Rating _____ AmpsConductor Size _____ Qty _____

Ground Wire Size _____ Engine Oil Level: _____ Ok _____ Check

Coolant Level: _____ Ok _____ CheckFuel Absorption Mat _____ yes _____ no

Utility Power Conductors Disconnected _____ yes _____ no

Fuel leaks observed _____ yes _____ no

Generator properly grounded _____ yes _____ no

Name of QA Performing Inspection

Comments: (Use Back if needed)

Management Comments

U.S. Army Corps of Engineers



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

CECG

7 Dec 18

MEMORANDUM FOR [REDACTED] Department of Defense
Office of Inspector General (DoD OIG), 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: Response to the DoD OIG Draft Report, Audit of the U.S. Army Corps of Engineers (USACE) Oversight of Temporary Emergency Power Contracts Awarded for Hurricanes Harvey and Irma (Project No. D2018- DOOOCG-0066.000), dated 16 Oct 2018.

1. I appreciate your team's efforts on this project and the acknowledgment of the unprecedented nature of the 2017 hurricane season. The magnitude of Hurricanes Harvey, Irma, and Maria is an important backdrop to understand the Contracting Officer's Representative (COR) challenges in documenting oversight performed for three service contracts for temporary emergency power, valued at \$19 million.
2. USACE accepts the DoD OIG's four-part recommendation with comment. Given the enormity of the nation's historic year of weather and climate disasters, it is important to place this audit in proper context. In total, the U.S. was impacted by 16 separate billion-dollar disaster events including 3 tropical cyclones, 8 severe storms, 2 inland floods, a crop freeze, drought and wildfire as reported by NOAA National Center for Environmental Information. The damage from Hurricanes Harvey, Irma, and Maria alone were responsible for approximately \$265 billion of the \$306 billion in 2017 weather and climate related disasters. Each of these destructive hurricanes join Hurricanes Katrina and Sandy, in the new top five costliest U.S hurricanes on record. USACE is funded to train an approximately 1,500 voluntary disaster response force. USACE responded to 32 events with nearly 6,000 deployments. We installed over 2,400 generators for Temporary Emergency Power in Texas, Florida, Puerto Rico, and USVI. To respond to this unprecedented demand for emergency response missions, USACE assumed calculated risk to mitigate shortfalls and provided just-in-time training to save lives and restore life-sustaining infrastructure.
3. I am proud of USACE's extraordinary efforts in providing emergency power to critical facilities and to the 19.8 million people impacted by 2017 hurricanes. I value the DoD OIG work as we improve how USACE better complies with Federal and DoD contracting guidance during unique disaster responses. USACE understands the importance of adequately documenting our monitoring to demonstrate accountability while we turn on the power for millions of people.
4. The DoD OIG draft report identified two deficiencies:

U.S. Army Corps of Engineers (cont'd)

a. Deficiency #1 – The COR for three Advanced Contracting Initiative (ACI) contracts did not properly monitor or document an assessment of the contractor's performance and did not maintain adequate records of oversight efforts.

b. Deficiency #2 – USACE Power Restoration Team (PRT) personnel did not document that they performed Quality Assurance (QA) procedures sufficient to demonstrate that the contractors performed contracted services to the standard specified in the performance work statement.

5. The DoD OIG recommended USACE take the following actions:

a. DoD OIG Recommendation #1.a. Provide training for the COR on performing the duties for contractor oversight on temporary emergency power contracts to include documenting contractor performance and contracting officer's representative oversight efforts as specified in the COR designation letter.

b. USACE Response to Recommendation #1.a. Concur. Due to staffing limitations and the high demand for Task Force Temporary Emergency Power Program (TFTP) missions during Hurricanes Harvey and Irma, the COR had to prioritize temporary power mission execution; and as a result, had insufficient time to complete every task associated with his COR duties. USACE recognizes the importance of the COR's duties and is addressing this by training additional CORs. In the interim, USACE is using CORs from other offices as needed to assist in managing the temporary power ACI contracts. The Pittsburgh District will have two additional trained CORs dedicated to TFTP NLT 01 April 19.

c. DoD OIG Recommendation #1.b. Provide training to the procuring contracting officer on monitoring the performance of personnel designated for contracting officer's representative responsibilities on emergency temporary power contracts.

d. USACE Response to Recommendation #1.b. Concur. Recommendation completed. The TFTP Procuring Contracting Officer (PCO) took immediate action and reviewed all necessary regulations related to COR appointment and training as an informal training method. In addition, the contracting office has addressed this issue by obtaining assistance from another District initially, then hiring a GS-13 Technical Expert to take over contracting officer responsibilities for temporary power missions.

e. DoD OIG Recommendation #1.c. Direct contracting officials responsible for emergency temporary power ACI contracts to update the QA surveillance plan to include specific means for documenting daily QA assessments.

f. USACE Response to Recommendation #1.c. Concur. However, the ACI procurement process has progressed to a point where it is not feasible to amend the solicitation documents. USACE plans to award the ACI contracts, which are estimated


U.S. Army Corps of Engineers (cont'd)

for February 2019, and then revise the QA surveillance plan post-award through a contract modification. This modification will take place NLT 01 Jun 19.

g. DoD OIG Recommendation #1.d. Ensure that all personnel performing the QA responsibilities for the temporary emergency power mission receive appropriate contract QA training emphasizing the importance of properly documenting their quality assurance inspections.

h. USACE Response to Recommendation #1.d. Concur. USACE will develop both an online and on the job QA curriculum and require that all QAs complete the training. Beginning in 2019, this curriculum will be included in the online USACE Level II Emergency Power Training. All PRT members are required to complete Level II training. This will ensure that PRT members receive this training which will further improve effectiveness.

6. My point of contact for this response at HQUSACE is [REDACTED] Chief, Acquisition Support Division, [REDACTED]


TODD T. SEMONITE
Lieutenant General, USA
Commanding

Acronyms and Abbreviations

ACI	Advanced Contracting Initiative
COR	Contracting Officer's Representative
CORT	Contracting Officer's Representative Tracking
DFARS	Defense Federal Acquisition Regulation Supplement
ESF	Emergency Support Function
FAR	Federal Acquisition Regulation
FEMA	Federal Emergency Management Agency
MM	Mission Manager
NRF	National Response Framework
PCO	Procuring Contracting Officer
PICC	Power Interagency Coordination Call
PRT	Planning and Response Team
QA	Quality Assurance
QASP	Quality Assurance Surveillance Plan
USACE	United States Army Corps of Engineers

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U.S. DEPARTMENT OF DEFENSE

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Congressional Liaison
703.604.8324

Media Contact
public.affairs@dodig.mil; 703.604.8324

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www.dodig.mil
Defense Hotline 1.800.424.9098

