



December 2015

OPERATIONAL CONTRACT SUPPORT

Additional Actions Needed to Manage, Account for, and Vet Defense Contractors in Africa

GAO Highlights

Highlights of [GAO-16-105](#), a report to congressional committees

Why GAO Did This Study

Since its establishment in 2008, AFRICOM has increased its footprint in Africa to support its mission—building African partner capabilities and deterring threats to regional security. In tandem with AFRICOM's growing footprint will be a continued reliance on contractors to support the command's operations. Accordingly, AFRICOM and subordinate commands must be able to plan for and integrate OCS during operations. House Report 113-446 included a provision for GAO to review OCS in Africa.

This report examines the extent to which AFRICOM (1) has an organizational structure in place to manage, plan for, and assess OCS; (2) accounts for contractor personnel; and (3) vets non-U.S. contractors and contractor employees. To conduct this work, GAO evaluated AFRICOM's OCS organizational structures and conducted site visits to Djibouti, Niger, and Uganda to collect information on accountability and vetting processes. GAO selected these locations based on the types of contractor employees represented, among other factors.

What GAO Recommends

GAO made recommendations to DOD regarding types of contractor personnel to account for, foreign vendor vetting process development, and guidance for contractor accountability and employee screening, among others. DOD generally concurred, but did not concur that AFRICOM should develop contractor accountability guidance because it was in the process of doing so. GAO continues to believe the recommendations are valid, as discussed in this report.

View [GAO-16-105](#). For more information, contact Cary Russell at (202) 512-5431 or russellc@gao.gov.

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What GAO Found

U.S. Africa Command (AFRICOM) has established a formal operational contract support (OCS) organizational structure at its headquarters to serve as the central coordination point to manage, plan for, and assess OCS. However, except for U.S. Army Africa, AFRICOM's subordinate commands do not have OCS organizational structures with dedicated personnel to manage OCS. Officials from AFRICOM's subordinate commands stated that applying OCS concepts would be helpful to avoid duplication of work and increased costs. One structure that the Department of Defense (DOD) has introduced is an OCS Integration Cell, an entity with dedicated personnel to provide staff integration and promote coordination on OCS issues; such a cell could help identify and address gaps at AFRICOM's commands, especially in a joint environment like Combined Joint Task Force-Horn of Africa, where contracting officials stated that some military tenants have arrived without informing responsible officials about the number of contractors accompanying them. AFRICOM has also developed a scorecard to assess OCS management capabilities at the subordinate commands against certain standards, but these assessments have not always been accurate because the standards have not been clearly defined or consistently applied. Without clearly defined assessment standards, AFRICOM cannot accurately assess the OCS actions taken by subordinate commands.

AFRICOM does not have a complete picture of the number of contractor personnel supporting its operations in the region. AFRICOM uses two primary sources—daily personnel status reports and the Synchronized Predeployment and Operational Tracker, a DOD contractor personnel accountability database—to collect contractor personnel accountability information, but neither source provides comprehensive accountability or visibility of DOD contractor personnel on the continent because the total number of local national contractor personnel are not being included in either, and the numbers of U.S. citizen and third country national contractor personnel vary between the two. Without clear guidance on how to comprehensively account for contractor personnel, it will be difficult for AFRICOM to ensure that it has full visibility over who is supporting its operations.

AFRICOM conducts some limited vetting of potential non-U.S. contractors, also referred to as vendors, but it has not established a foreign vendor vetting process or cell that would preemptively identify vendors who support terrorist or other prohibited organizations. AFRICOM has not yet established a foreign vendor vetting cell because while DOD guidance discusses the benefit of a cell, it does not require it or specify under what conditions it would be appropriate. Additionally, DOD sites in Africa use background investigations to determine the trustworthiness of contractor employees with access to DOD facilities. However, not all AFRICOM sites are incorporating additional screening measures, such as biometric screening or counterintelligence interviews, based on the specific risks at each site. As a result, AFRICOM is at risk of not exercising the appropriate level of vendor vetting or contractor employee screening on the African continent to protect DOD personnel from insider threats.

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Abbreviations

AFRICOM	U.S. Africa Command
DOD	Department of Defense
OCS	Operational Contract Support
SPOT	Synchronized Predeployment and Operational Tracker

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December 17, 2015

The Honorable John McCain
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Mac Thornberry
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

As major military operations wind down in Afghanistan, the Department of Defense (DOD) continues to engage with partner nations in other regions of the world, including Africa, and increasingly relies on contractors to provide support for a range of activities such as security force assistance and training. Since 2002 DOD has spent billions of dollars on contract support for operations in Iraq and Afghanistan, and has taken steps to address challenges regarding the planning, management, and oversight of contractors in that region.¹ However, the conditions under which DOD operates in Africa, such as having limited resources and extensive distances between DOD locations across the continent, complicated by efforts to counter violent extremist organizations in a noncombat zone, create additional challenges in contract support planning and management.

Accordingly, DOD's U.S. Africa Command (AFRICOM) and its subordinate commands must be familiar with how to plan for and integrate operational contract support (OCS) into military operations and activities. OCS is the process of planning for and obtaining supplies, services, and construction from commercial sources in support of joint

¹Commission on Wartime Contracting in Iraq and Afghanistan, *Transforming Wartime Contracting: Controlling Costs, Reducing Risks* (August 2011).

operations.² In our body of work on OCS,³ we have reported that DOD has long experienced challenges in managing OCS. For example, in our 2015 report highlighting high risk issues in the federal government, we reported that DOD continues to face capacity shortfalls and lacks performance measures to address operational contract support issues.⁴ In February 2013 we reported that, with the exception of the Army, the military services had not issued comprehensive service-specific guidance that described roles, responsibilities, and requirements to help integrate OCS into their planning efforts for contingency operations.⁵ Further, in June 2010 and again in September 2012 we testified on the need for a cultural change in DOD that emphasizes an awareness of OCS throughout the department to address the challenges faced in contingency operations.⁶ In recent years DOD and the Joint Staff have issued and updated OCS guidance, discussing matters such as identifying and planning for OCS requirements, OCS roles and responsibilities, and processes for contractor personnel accountability.⁷

House Report 113-446, accompanying a bill for the National Defense Authorization Act for Fiscal Year 2015, included a provision for GAO to

²Joint Chiefs of Staff, Joint Pub. 4-10, *Operational Contract Support* at GL-8 (July 16, 2014) (hereinafter cited as Joint Pub. 4-10 (July 16, 2014)). In a DOD regulation, the department defines operational contract support as the ability to orchestrate and synchronize the provision of integrated contract support and management of contractor personnel providing support to the joint force within a designated operational area. 32 C.F.R. § 158.3; Department of Defense Instruction 3020.41, *Operational Contract Support (OCS)* at 49 (Dec. 20, 2011).

³See Related Products Page at the end of this report.

⁴GAO, *High-Risk Series: An Update*, [GAO-15-290](#) (Washington, D.C.: Feb. 11, 2015). Every 2 years, in accordance with congressional elections, GAO calls attention to agencies and program areas that are high risk due to their vulnerabilities to fraud, waste, abuse, and mismanagement, or are most in need of transformation.

⁵GAO, *Warfighter Support: DOD Needs Additional Steps to Fully Integrate Operational Contract Support Into Contingency Planning*, [GAO-13-212](#) (Washington, D.C.: Feb. 8, 2013).

⁶GAO, *Warfighter Support: Cultural Change Needed to Improve How DOD Plans for and Manages Operational Contract Support*, [GAO-10-829T](#) (Washington D.C.: June 29, 2010) and *Operational Contract Support: Sustained DOD Leadership Needed to Better Prepare for Future Contingencies*, [GAO-12-1026T](#) (Washington D.C.: Sept. 12, 2012).

⁷See generally Department of Defense Instruction 3020.41, *Operational Contract Support (OCS)* (Dec. 20, 2011); 32 C.F.R. pt. 158; Joint Pub. 4-10 (July 16, 2014).

examine matters related to OCS in Africa.⁸ This report evaluates the extent to which AFRICOM (1) has an organizational structure in place to manage, plan for, and assess operational contract support; (2) accounts for contractors in its area of responsibility; and (3) vets non-U.S. contractors and contractor employees.

To address these objectives we reviewed relevant documents, including DOD guidance, and interviewed officials in the Joint Staff and Office of the Secretary of Defense, military services, AFRICOM, and its subordinate commands; Special Operations Command Africa; and Combined Joint Task Force-Horn of Africa.⁹ We also conducted site visits to three locations in Africa: (1) Navy-operated Camp Lemonnier in Djibouti; (2) Air Force-operated Exercise Reception Facility in Niger; and (3) multiple facilities operated by the Marine Corps and Special Operations forces in Uganda. We selected these locations based on variations in the military services represented, the types of contractor personnel (U.S., third country,¹⁰ and local national), and the types of services provided. To determine the extent to which AFRICOM has an organizational structure in place to manage, plan for, and assess OCS, we conducted interviews and collected documentation from AFRICOM headquarters and service component command officials. We also evaluated all OCS readiness scorecards used by AFRICOM logistics officials to measure subordinate commands' OCS management capabilities. To determine the extent to which AFRICOM accounts for contractor personnel in its area of responsibility, we reviewed DOD, AFRICOM, and Joint Staff personnel accountability guidance and interviewed AFRICOM personnel officials, as well as military service officials with personnel accountability responsibilities at the AFRICOM sites that we visited on the continent. To determine the extent to which AFRICOM vets contractors and contractor employees, we compared DOD and AFRICOM guidance to information gathered from officials at AFRICOM and on the continent regarding vendor vetting and contractor employee screening processes. We also observed contractor screening

⁸See H.R. Rep. No. 113-446, at 248-49 (2014).

⁹AFRICOM and all of the service component command headquarters are located in Europe. Combined Joint Task Force-Horn of Africa is located at Camp Lemonnier, Djibouti.

¹⁰Third country national contractors are contractors who are not from the U.S. or the country where the services are being provided, but rather from any other country.

and base access procedures at the sites in Djibouti, Niger, and Uganda. The information gathered from these three sites, while not generalizable to all AFRICOM sites, provides valuable insights about personnel accountability, contractor vetting, and contractor employee screening processes in the AFRICOM area of responsibility. Appendix I describes our objectives, scope, and methodology in greater detail.

We conducted this performance audit from June 2014 to December 2015 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.

Background

AFRICOM is DOD's newest geographic combatant command and was designated fully operational in September 2008. The command's area of responsibility comprises all the countries on the African continent except Egypt. According to AFRICOM officials, Camp Lemonnier, Djibouti, is the only DOD site in Africa with a long-term use agreement, but AFRICOM has established temporary facilities across the continent to house the personnel and equipment used for security assistance, training, and other operations in the region. AFRICOM is supported by its subordinate commands: U.S. Army Africa, U.S. Naval Forces Africa,¹¹ U.S. Marine Corps Forces Africa, U.S. Air Force Africa, and Special Operations Command Africa. AFRICOM also has a subordinate joint force command, Combined Joint Task Force-Horn of Africa, which conducts operations in East Africa to enhance partner nation capacity, promote regional stability, dissuade conflict, and protect U.S. and coalition interests.¹² U.S. Army Africa has a dedicated military contracting element, the 414th Contracting Support Brigade, which provides OCS planning assistance to U.S. Army Africa and synchronizes and executes contracting solutions across the

¹¹In addition to U.S. Naval Forces Africa, three other Navy component commands engage in contracting in the AFRICOM area of responsibility: the Navy Supply Systems Command Fleet Logistics Center Sigonella; the Navy Expeditionary Combat Command, and the Navy Facilities Engineering Command.

¹²A subordinate joint force command is a joint force command—either a subordinate unified command or joint task force command—that is subordinate to a combatant command and exercises command authority or operational control over a joint force.

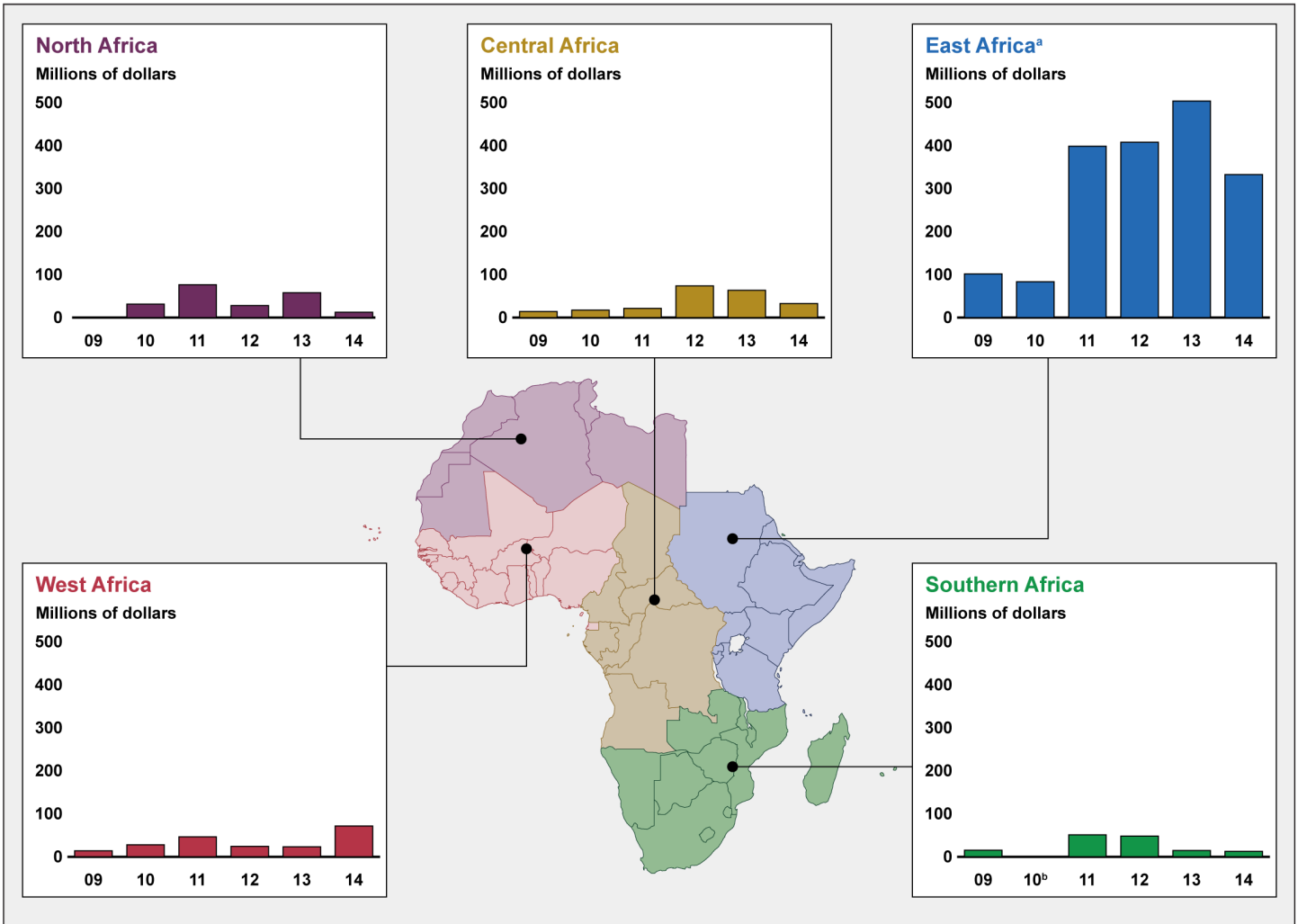
continent. AFRICOM's subordinate commands are located in Europe and do not have assigned forces, except for the joint task force, which is located at Camp Lemonnier in Djibouti.

Since its establishment AFRICOM has increased its footprint on the continent to support the command's missions of building African partner defense capabilities, responding to crises, and deterring transnational threats in order to promote regional security. In tandem with AFRICOM's growing footprint there has been a continued reliance on contractors to provide, among other things, logistical, transportation, and intelligence support to the command's missions. This reliance on contractors was highlighted in September 2014 when AFRICOM supported the U.S. Agency for International Development and Liberia under Operation United Assistance in responding to the largest Ebola epidemic in history. AFRICOM reported having approximately 5,600 personnel¹³ on the African continent in October 2014, of whom 569—approximately 10 percent—were U.S. citizen contractor personnel. Moreover, the dollar value associated with DOD contracts in AFRICOM's area of responsibility more than doubled, from \$147 million in fiscal year 2009 to \$463 million in fiscal year 2014.¹⁴ While the dollar value associated with these contracts decreased in most regions from fiscal year 2013 to fiscal year 2014 (see figure 1), AFRICOM officials expect the need for contract support to increase as regional instability and responsibilities for protecting U.S. personnel and facilities continue.

¹³These reported personnel were military, civilian, and U.S. contractor employees.

¹⁴The dollar values represent the obligations associated with contracts awarded by the Department of Defense in the Africa Command area of responsibility, according to a DOD report using data from the Federal Procurement Data System and supplemented with data from the Army Contracting Business Intelligence System in some cases.

Figure 1: Value Associated with DOD Contracts in U.S. Africa Command Area of Responsibility, Fiscal Years 2009-2014



Source: GAO analysis of Department of Defense (DOD) data. | GAO-16-105

Notes: The dollar values in the figure above represent the obligations associated with contracts awarded by the Department of Defense (DOD) in the Africa Command (AFRICOM) area of responsibility, according to a DOD report using data from Federal Procurement Data System and supplemented with data from the Army Contracting Business Intelligence System in some cases.

^aContract values from fiscal years 2012 to 2014 reflect approximately \$600 million in military construction projects at Camp Lemonnier, Djibouti, that according to DOD officials are scheduled to be completed in fiscal years 2016-2017.

^bThe data provided by DOD reflect a negative contract action obligation value in the Southern Africa region in fiscal year 2010. According to AFRICOM, this was due to a canceled contract that resulted in the funds being returned to DOD.

OCS Functions

OCS is the process of planning for and obtaining supplies, services, and construction from commercial sources in support of joint operations. OCS encompasses three functions: contract support integration, contracting support, and contractor management.¹⁵ These functions and their associated tasks are described in figure 2.

Figure 2: Operational Contract Support Functions and Associated Tasks

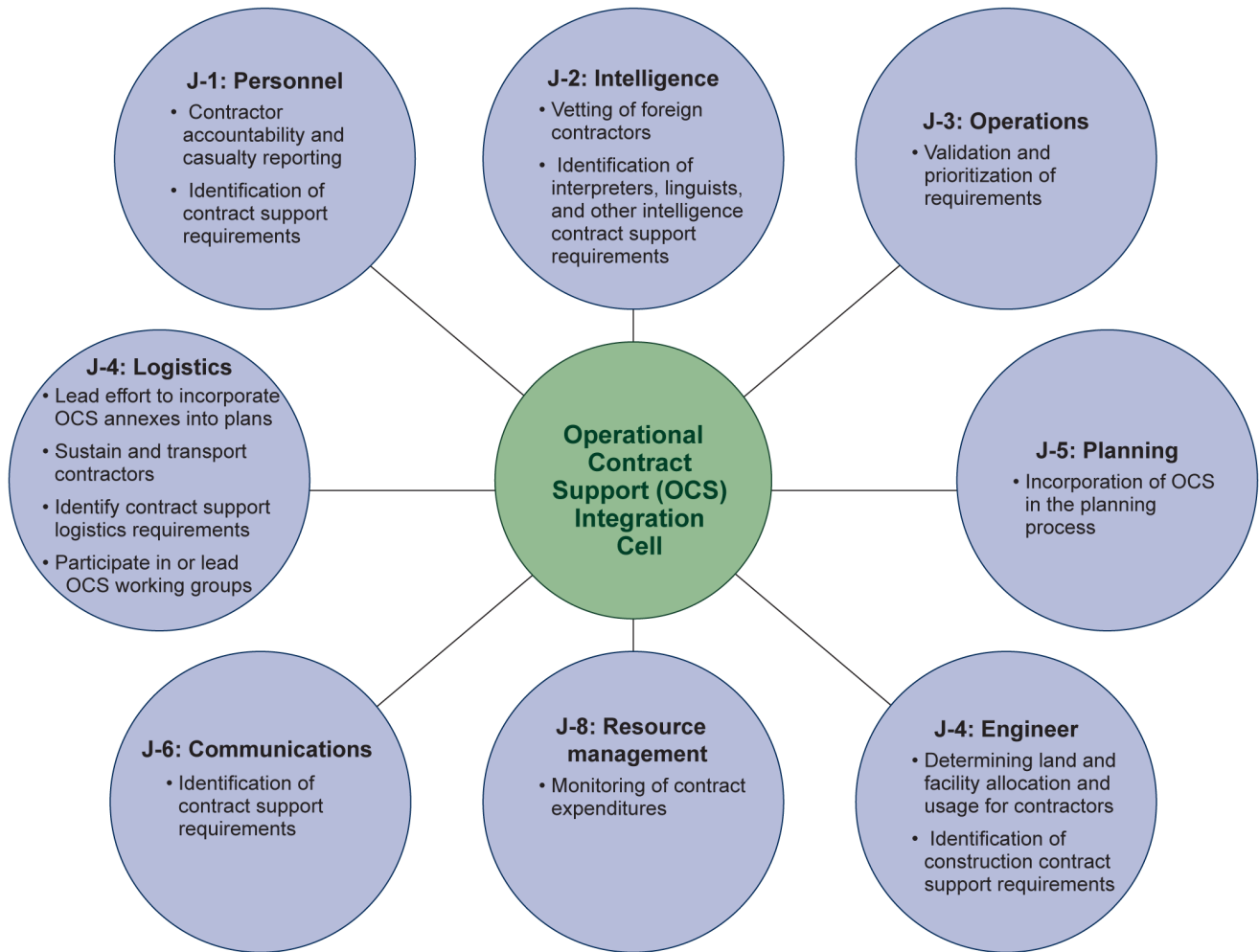
Contract support integration	Contracting support	Contractor management
<ul style="list-style-type: none"> • Plan and integrate contract support • Develop, validate, and prioritize requirements • Perform Operational Contract Support (OCS) knowledge management • Conduct assessments and provide recommendations on OCS capabilities 	<ul style="list-style-type: none"> • Plan and organize contracting elements • Translate requirements into contract documents • Develop contracts • Award and administer contracts • Close out contracts 	<ul style="list-style-type: none"> • Plan contractor management • Prepare for contractor deployment • Deploy/redeploy contractors • Manage contractors • Sustain contractors

Source: Joint Staff. | GAO-16-105

Determining OCS requirements, as well as conducting the initial planning for and coordination of these tasks, is primarily an operational, not a contracting, function. As a result, all of the directorates within a command have OCS roles or responsibilities, but the directorates may not fully understand how to properly define requirements for and manage OCS. In the 2014 update to Joint Publication 4-10 the Joint Staff introduced the concept of an OCS Integration Cell as a central coordination point that can, among other things, provide staff integration by assisting and advising the directorates on these issues. Figure 3, based on information from the Joint Staff, demonstrates the integrating role of an OCS Integration Cell.

¹⁵In the context of OCS, “contractor management” refers to the oversight and integration of contractor personnel and associated equipment providing support to the joint force in a designated operational area. 32 C.F.R. § 158.3; Joint Pub. 4-10, at I-3 (July 16, 2014).

Figure 3: Operational Contract Support Integration Cell's Staff Integration Function within a Command



Source: Joint Staff. | GAO-16-105

Notes: DOD's combatant commands are typically organized into directorates (designated as Js in the figure). This is a general depiction of a combatant command's structure; individual structures may vary.

Contractor Personnel Accountability

Personnel accountability is generally the process by which the geographic combatant command identifies, captures, and records information—usually through the use of a database—about the number and type of personnel, including contractor personnel, in its area of operations. DOD's Synchronized Predeployment and Operational Tracker (SPOT) was developed to assist the combatant commander in ensuring that

accountability, visibility, force protection, medical support, personnel recovery, and other related support can be accurately forecasted and provided for the contractor personnel in the command's area of responsibility. SPOT contains personnel accountability data only for contractor personnel (U.S. citizen, third country, and local national), not military or civilian personnel. When specified by contract, vendors are responsible for inputting and maintaining their employees' personnel data in SPOT throughout the employees' periods of performance. SPOT and service-specific accountability systems typically feed information into DOD's accountability system to produce joint personnel status reports.

Vendor Vetting and Contractor Employee Screening

DOD contracting officers are required to check prospective contractors' names against a list of prohibited, restricted, or otherwise ineligible entities in a U.S. government contracting database called the System for Award Management.¹⁶ The prohibited entities list in the System for Award Management contains sanctioned and other prohibited entities identified by the Department of Treasury, Department of State, DOD, and other U.S. agencies. A foreign vendor vetting cell can also be established to vet selected local national and third country national companies so as to prevent DOD from awarding contracts to companies having ties to violent extremist organizations or other inappropriate entities. The vetting consists of researching the principal owners and connections of the company using information provided by owners, and then cross-checking this information against various intelligence sources.

Subordinate and individual base commanders are responsible for the security of military facilities within the combatant commander's area of responsibility. A contractor employee screening process mitigates the potential security risk that third country and local national contractor personnel may pose when they have access to DOD facilities. While there is no standard DOD methodology for contractor employee screenings overseas, a background investigation or similar process to

¹⁶See Class Deviation 2014-O0020, Prohibition on Contracting with the Enemy (Sept. 17, 2014); 48 C.F.R. (FAR) § 9.405(d). After a draft of this report was sent to DOD for comment, DOD issued Class Deviation 2015-O0016 in September 2015, which superseded Class Deviation 2014-O0020. The new guidance retained the requirement for contracting officers to check the prospective contractors' names against the list. See Class Deviation 2015-O0016, Prohibition on Providing Funds to the Enemy and Authorization of Additional Access to Records, attachment 3 (Sept. 15, 2015).

confirm the trustworthiness of contractor personnel should be conducted to the greatest extent possible.¹⁷

AFRICOM Has Established an Organizational Structure to Manage, Plan for, and Assess OCS, but Some Subordinate Commands Have Not Done So

AFRICOM established a formal OCS structure with dedicated personnel—including an OCS Integration Cell—at the headquarters level to serve as the central coordination point to integrate OCS in all directorates, and to manage, plan for, and assess OCS. However, only one of AFRICOM’s subordinate commands has an organizational structure in place with dedicated personnel to manage and plan for OCS. Furthermore, AFRICOM has developed a scorecard to assess OCS capabilities at the subordinate command level, but portions of each assessment of the six subordinate commands have been inaccurate because it is unclear how the performance measures in scorecards should be applied.

AFRICOM Has Established an Organizational Structure to Manage and Plan for OCS

AFRICOM headquarters’ establishment of a formal OCS organizational structure began in 2011 with three dedicated DOD civilian personnel to oversee OCS activities in Africa. Since that time, several notable OCS milestones have been achieved, such as the establishment of an OCS Integration Cell for the command’s headquarters in early 2014. According to Joint Publication 4-10, an OCS Integration Cell should be established as a permanent cell at the geographic combatant command level. The primary function of the cell is to conduct general OCS planning, provide advice, promote coordination, and maintain a common OCS operating picture.¹⁸ In 2015 AFRICOM headquarters expanded its OCS Integration Cell from three dedicated civilian personnel to five who work alongside two preexisting OCS planners from the Defense Logistics Agency’s Joint Contingency Acquisition Support Office, according to AFRICOM officials. AFRICOM directorates also participate in facilitating OCS. For example, AFRICOM’s personnel directorate is tasked with maintaining personnel accountability throughout the area of responsibility. AFRICOM also has boards and working groups dedicated to coordinating OCS activities, including a board that synchronizes and optimizes OCS during all phases

¹⁷ See Department of Defense Instruction 2000.16, DOD Antiterrorism (AT) Standards, encl. 3, para. E3.18.2 (Oct. 2, 2006) (incorporating change Dec. 8, 2006).

¹⁸ See Joint Pub. 4-10, at III-3 to III-4 (July 16, 2014).

of operation. Participants in these boards and working groups include members of the OCS Integration Cell, such as the Joint Contingency Acquisition Support Office planners assigned to the combatant command, as well as staff from the combatant command, service component commands, and other combat support agencies.

AFRICOM's OCS Integration Cell has also taken steps to manage OCS at its subordinate commands by conducting staff assistance visits to enhance OCS capabilities. Specifically, since March 2014, AFRICOM OCS Integration Cell officials have conducted staff assistance visits to all of AFRICOM's service component commands as well as to Special Operations Command Africa and Combined Joint Task Force-Horn of Africa. The purpose of these visits is to assist and partner with subordinate commands to ensure that current AFRICOM processes, policies, tools, and procedures for OCS align with DOD policy and joint doctrine, and to enhance mission execution. Additionally, staff assistance visits help AFRICOM officials to gain a better understanding of OCS procedures and challenges at the subordinate commands. Common observations that have been made during such visits include noting a lack of standardized OCS organization at the subordinate command levels, noting constrained subordinate command resources for managing OCS, and noting a lack of OCS training. AFRICOM officials stated that they intend to work with the subordinate commands to address these issues. However, these officials did not provide details or a plan for how they were to work with the subordinate components.

AFRICOM's OCS Integration Cell also plays a key role in planning for OCS by working with operational planners to incorporate OCS concepts into planning documents. For example, according to officials, the OCS Integration Cell assisted AFRICOM's planning directorate officials in developing OCS annexes for several concept plans, as well as the theater and regional campaign plans. These OCS annexes generally contained key considerations discussed in Joint Staff and other DOD guidance related to OCS, such as force protection, host nation agreements, and contractor oversight.

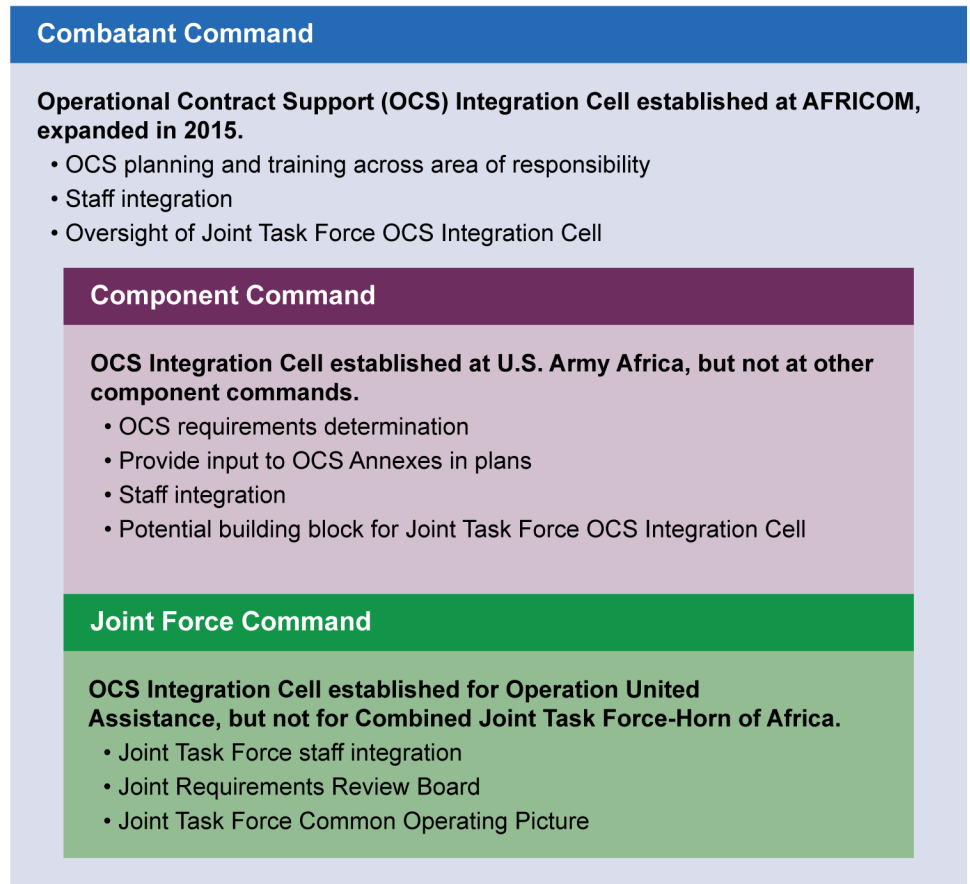
AFRICOM OCS Integration Cell officials also developed a template for subordinate commands to use as they begin to develop their own OCS planning documents, including OCS annexes to plans and orders when needed. The OCS planning template is meant to guide AFRICOM subordinate commands in OCS planning for operations, exercises, security cooperation activities, and other initiatives. It contains 20 steps, including identifying mission length and requirements, leveraging

historical contracts, developing acquisition and cross-servicing agreements, researching vendors, and identifying other factors that may impact OCS.

**Most AFRICOM
Subordinate Commands
Have Not Established an
OCS Organizational
Structure**

With the exception of U.S. Army Africa, AFRICOM's subordinate commands, including service component and joint force commands, generally lack formal organizational structures with personnel dedicated to OCS. Joint Publication 4-10 notes that OCS Integration Cells can be established at the service component and subordinate joint force command levels. Specifically, Joint Publication 4-10 indicates that each service component command determines, based on specific operational requirements, whether it should establish an OCS Integration Cell. For details about the functions of OCS Integration Cells at the combatant command, component command, and joint force command levels, see figure 4.

Figure 4: Operational Contract Support Integration Cell Functions at Different Levels of U.S. Africa Command



Source: GAO analysis of Joint Staff, U.S. Africa Command (AFRICOM), and subordinate command information. | GAO-16-105

Note: Operation United Assistance refers to DOD's counter-Ebola effort in West Africa in fall 2014. As part of this operation, AFRICOM set up a Joint Force Command headquartered in Monrovia, Liberia, to provide regional support to U.S. military activities and facilitate coordination with U.S. government and international relief efforts.

U.S. Army Africa has established an organizational structure with dedicated full-time OCS personnel employed within the logistics directorate.¹⁹ This OCS Cell works with planners to incorporate OCS

¹⁹While U.S. Army Africa does not consider these personnel to constitute an OCS Integration Cell, the division provides the same OCS-coordinating function as an OCS Integration Cell.

concepts into planning documents. U.S. Army Africa's OCS Cell has also issued OCS guidance, which outlines OCS roles and responsibilities, including those related to development of contract requirements; OCS programs and procedures; and intra-theater cooperation with other component commands. Additionally, U.S. Army Africa's dedicated military contracting element—414th Contracting Support Brigade—provides OCS planning assistance to U.S. Army Africa. While U.S. Naval Forces Africa, U.S. Air Force Africa, and U.S. Marine Corps Forces Africa do not have formalized OCS organizational structures, all of the service component commands participate in AFRICOM's OCS-related working groups. In addition, Marine Corps Forces Africa has designated one official in its logistics directorate to serve as the component command's OCS chief, but according to Marine Corps officials, this official is also responsible for OCS policy and coordination in the European Command area of responsibility. U.S. Air Force Africa and U.S. Naval Forces Africa²⁰ have not established OCS organizational structures or dedicated OCS personnel.

While joint staff guidance does not require the establishment of an OCS Integration Cell or dedicated OCS personnel at the service component command level, joint staff has emphasized the benefits of using an OCS Integration Cell to synchronize requirements and coordinate contracting actions. Moreover, Navy contracting officials stated that contract requirements are not always clear, and if they do not have the statements of work from the requiring activity at an early stage, they may not know what is needed before the forces arrive on the ground. As a result, operations might be delayed or might be carried out without sufficient equipment or support services. An OCS Integration Cell or similar structure with dedicated OCS personnel at the other service component commands could help identify contract support issues early in the requirements development process, thereby enabling the commands to avoid delays. For example, U.S. Army Africa's dedicated OCS personnel and the 414th Contracting Support Brigade have corrected potential issues regarding poor coordination of contracts. U.S. Army Africa officials stated that an Army unit may fail to inform contracting officials about what equipment they are bringing along on deployment, or may disregard

²⁰In addition to the U.S. Naval Forces Africa, three other Navy component commands engage in contracting in the AFRICOM area of responsibility: the Navy Supply Systems Command Fleet Logistics Center Sigonella, the Navy Expeditionary Combat Command, and the Navy Facilities Engineering Command.

training on how to properly draft a performance work statement. The 414th Contracting Support Brigade will incorporate these missing details into the contracts based on previous experience with units requiring similar services or goods.

U.S. Naval Forces Africa, U.S. Marine Corps Forces Africa, and U.S. Air Force Africa logistics officials stated that one of their challenges is the limited number of personnel who are available to be dedicated to OCS. In our February 2015 report on high risk issues, we reported that DOD continues to face capacity shortfalls for addressing OCS issues.²¹ Funding and staffing constraints may prevent the establishment of an OCS Integration Cell at the service component command level. Joint Publication 4-10 recognizes that the establishment of an OCS Integration Cell or similar structure at the service component command level will vary based on specific operational requirements. Joint guidance also indicates that there is no set structure or size for an OCS Integration Cell at any command level; size and configuration are mission-dependent, and a cell could be as small as two individuals or could be significantly larger, depending on the operation. Air Force Africa and Navy Africa officials also cited a lack of service guidance as an impediment to establishing an OCS organizational structure.

An OCS Integration Cell was established at AFRICOM's subordinate joint force command supporting Operation United Assistance in 2014, but not at the Combined Joint Task Force-Horn of Africa at Camp Lemonnier, Djibouti, or Special Operations Command Africa.²² Joint Publication 4-10 indicates that an OCS Integration Cell is normally established at the subordinate joint force command level, where it leads general OCS planning, provides advice, promotes coordination of OCS matters, and maintains an OCS common operating picture, among other tasks.²³ As of January 2015, according to officials, Combined Joint Task Force-Horn of Africa had two officials in the contingency contracting office and one logistics official who received OCS training. Officials further stated that Combined Joint Task Force-Horn of Africa plans to dissolve its

²¹[GAO-15-290](#)

²²Joint Publication 1 indicates that a joint task force is a type of joint force command. See *generally* Joint Chiefs of Staff, Joint Pub. 1, Doctrine for the Armed Forces of the United States, ch. IV (Mar. 23, 2013).

²³Joint Pub. 4-10, at III-7, D-4 to D-7 (July 16, 2014).

contingency contracting office entirely by the end of fiscal year 2016, as it transitions to a more enduring presence at Camp Lemonnier, Djibouti. DOD officials stated that there are plans to create two dedicated OCS positions within the Combined Joint Task Force-Horn of Africa's logistics directorate. As dedicated personnel, these officials could carry out some OCS coordinating tasks and could frequently communicate with logistics, operations, and planning officials about OCS issues. However, an OCS Integration Cell would provide a permanent centralized coordination point within the joint environment at Camp Lemonnier. Furthermore, this type of coordination will be increasingly important in the future, as DOD develops a more enduring joint presence at Camp Lemonnier.

At the subordinate joint force command level, joint guidance provides that an OCS Integration Cell should normally exist, depending on mission conditions, but the guidance does not specify those conditions. As a result, there is no clear guidance directing Combined Joint Task Force-Horn of Africa or Special Operations Command Africa to establish an OCS Integration Cell. An OCS Integration Cell or similar structure would be particularly useful in a joint environment due to the number of military service contracting elements operating at one location with potentially limited resources. According to Combined Joint Task Force-Horn of Africa contracting officials, applying OCS concepts such as establishing an OCS Integration Cell at Camp Lemonnier would be helpful to avoid duplication of work and increased costs. For example, there are multiple car rental contracts for different service components located at Camp Lemonnier, Djibouti. Combined Joint Task Force-Horn of Africa contracting officials stated that if they had all contracted with one vendor they would have gotten a better price. As another example, officials at Camp Lemonnier stated that some military service tenants have arrived without previously informing the Navy as the Lead Service for Contracting at Camp Lemonnier about the number of contractor personnel accompanying them. Without prior coordination, Navy officials do not know how much housing, food, and fuel they require at the base. Special Operations Command Africa officials stated that the contract requirements development process can be haphazard, and that logistical planners are often brought into the process later than necessary. An OCS organizational structure or dedicated OCS personnel could ensure that OCS requirements are considered and clarified well before operations have begun.

AFRICOM Developed a Tool to Assess Subordinate Commands' OCS Capabilities, but Assessments Do Not Fully Reflect Subordinate Command Performance

In May 2013 AFRICOM developed and began utilizing OCS Readiness Scorecards to systematically assess its subordinate commands' progress in managing OCS. The scorecards document how well OCS is being incorporated into the subordinate commands' planning documents, organizational structures such as boards and working groups, training exercises, and accountability processes. To that end, the scorecards comprise 32 OCS tasks divided among four broad categories: (1) compliance (planning, administration, and training); (2) boards and working groups; (3) exercises; and (4) common operating picture/SPOT. The command's OCS Integration Cell rated each subordinate command as being either compliant, partially compliant, or non-compliant for each component task, based on OCS Integration Cell officials' determination about the subordinate command's progress toward completing that task. For example, according to U.S. Army Africa's May 2014 OCS readiness scorecard, personnel had received training for contracting officer's representatives prior to their deployment, so it was rated as compliant for this task. According to AFRICOM officials, the scorecards provide an overall picture of subordinate commands' OCS capabilities, promote collaboration on OCS issues, and identify timely OCS training requirements and activities.

However, we found that AFRICOM's assessments do not fully reflect the extent to which subordinate commands have completed or not completed OCS tasks. Specifically, in three of AFRICOM's scorecard assessments it listed the subordinate command as complying with a task, when the subordinate command had not accomplished that task. For example, one component task is to incorporate OCS-specific tasks into exercises. AFRICOM assessed Air Force Africa as compliant on this task. However, Air Force Africa officials stated that they did not participate in any exercises during the assessment time period, so they did not incorporate OCS tasks into exercises. In another example, Special Operations Command Africa officials stated that they had processes for awarding contracts, but they lacked standard processes for incorporating OCS into planning and requirements determinations. However, AFRICOM listed Special Operations Command Africa as possessing standardized processes for support units and activities because the scorecard does not specify that these processes should specifically involve the incorporation of OCS into planning and requirements development.

Furthermore, AFRICOM applied different standards of compliance to different subordinate commands. For example, one component task focuses on contractor accountability through the utilization of SPOT, a contractor personnel accountability database. AFRICOM assessed

Marine Forces Africa as partially compliant with its contractor accountability guidance, and all other components as fully compliant. However, AFRICOM officials stated that no subordinate command had processes in place to ensure that contractor personnel were being included in SPOT—a contractor accountability database—at the time of the assessment, and that AFRICOM contractor personnel accountability guidance was unclear about when the commands were required to account for contractor personnel, and what types of contractor personnel to include. While AFRICOM did not penalize the subordinate commands for non-compliance when the guidance they need to comply with is unclear, the scorecards did not clarify how to assess subordinate commands under these conditions. As a result, the assessment officials inconsistently applied the assessment standards.

According to GAO's performance measure evaluation guidance, performance measures should be objective and performance data should be accurate and consistent. According to AFRICOM's OCS Instruction, AFRICOM logistics officials are tasked with conducting periodic reviews or inspections of AFRICOM staff and component commands to ensure compliance with required OCS tasks.²⁴ In addition, Standards for Internal Control in the Federal Government state that control activities need to be established to monitor performance measures and indicators, and that these activities should be effective and efficient in accomplishing objectives.²⁵ Moreover, according to GAO best practices in performance measurement, agency officials need to ensure that performance data are complete, accurate, and consistent enough to document performance and support decision-making at various organizational levels.²⁶ Further, to the greatest extent possible, performance goals and measures should not require subjective considerations or judgments to dominate the measurement.²⁷

²⁴U.S. Africa Command Instruction 4800.01A, Operational Contract Support (OCS), para. 6.a(19) (May 1, 2012).

²⁵GAO, *Standards for Internal Control in the Federal Government* (Washington, D.C.: November 1999).

²⁶[GAO/GGD-96-118](#) *Executive Guide: Effectively Implementing the Government Performance and Results Act* (Washington, D.C.: June 1996).

²⁷[GAO/GGD-10.1.20](#), *Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans* (Washington, D.C.: April 1998).

AFRICOM's assessments do not accurately reflect subordinate command OCS capabilities in that its assessment standards are unclear. In explaining the errors contained within the scorecards, AFRICOM officials who conducted the scorecard evaluations stated that they gave the subordinate commands the benefit of the doubt for certain tasks, particularly those for which guidance was unclear. AFRICOM officials further stated that the scorecard process is maturing, that there are several component tasks in the scorecards that they realize need improvement or clarification, and that the future Theater Campaign Plan will provide clearer explanations of the component tasks in terms of compliance and OCS planning. However, AFRICOM officials stated that they are in the process of updating the Theater Campaign Plan and did not give a timeframe for completion.

Without clearly defined assessment standards for the scorecard, AFRICOM cannot accurately assess the OCS actions taken by subordinate commands. The lack of accurate assessments threatens the integrity of those measures and undermines their value in promoting progress in OCS management. Furthermore, AFRICOM officials stated that they plan to incorporate OCS scorecards into the Defense Readiness Reporting System, the system used to gauge readiness across DOD. Without improvements, either full or partial incorporation of the scorecard assessments into DOD's readiness reporting system could compromise the integrity of that system by capturing an inaccurate picture of OCS readiness.

AFRICOM Cannot Comprehensively Account for DOD Contractor Personnel in Africa

Contractors in Africa provide a variety of services in support of U.S. military operations, such as transportation, construction, and food services, and officials expect the number of contractor personnel on the continent to increase. However, AFRICOM does not have a complete picture of the number of contractor personnel supporting its operations in the region. AFRICOM uses two primary sources—daily personnel status reports²⁸ and SPOT, a DOD contractor personnel accountability database—to collect contractor personnel accountability information, but neither source provides comprehensive accountability or visibility of DOD

²⁸We refer to the personnel reports that each subordinate command compiles to send to AFRICOM as personnel status reports. The reports AFRICOM then compiles from the subordinate commands to send to the Joint Staff are referred to as joint personnel status reports.

contractor personnel on the continent because the total number of local national contractor personnel are not being included in either, and because the numbers of U.S. citizen and third country national contractor personnel vary between the two.

Contractors Provide a Variety of Services to Support U.S. Military Operations in Africa and AFRICOM Expects to Increase Its Reliance on Them

According to SPOT data, which account for some but not all contractor personnel, the number of contractor personnel in Africa is more than 1,130—a nine-fold increase since April 2011. DOD contractor personnel perform a variety of functions and services to support mission needs, including transportation, linguistics, engineering, construction, cleaning, and food services. For example, in November 2014 AFRICOM reported approximately 300 U.S. contractor personnel included in SPOT as supporting Operation United Assistance in Senegal and Liberia. The contractor services primarily consisted of construction and engineering of training and medical units, and basic life support for troops, such as food and janitorial services. AFRICOM also reported approximately 350 U.S. contractor personnel at Camp Lemonnier, Djibouti, in October 2014 through its daily personnel status reports. These contractor personnel performed a number of functions, including transportation, engineering, and construction.

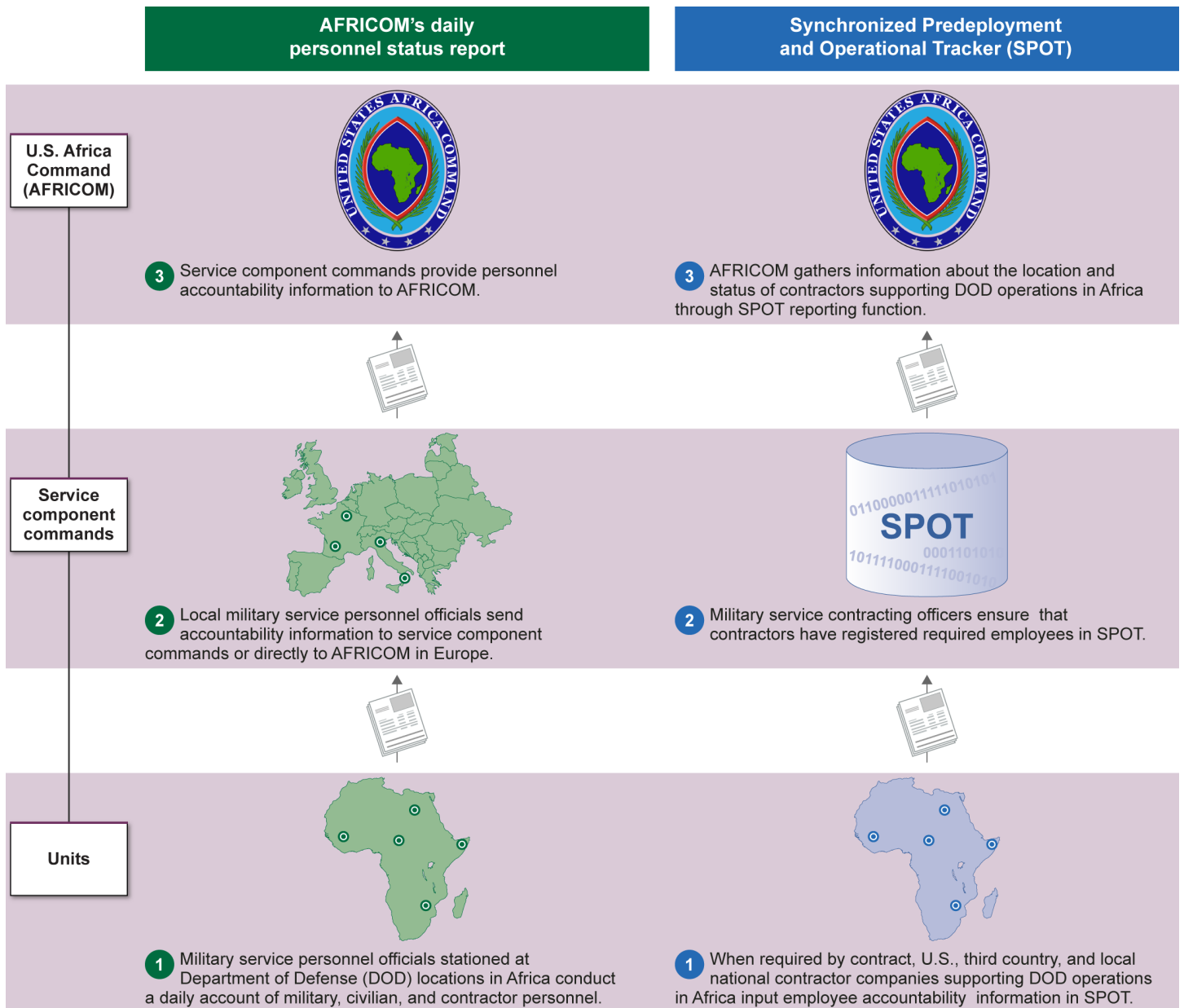
AFRICOM officials expect the number of contractor personnel on the continent to continue to increase. Plans for expansion at Camp Lemonnier in 2015 include numerous projects to increase capacity such as expansion of emergency troop housing, taxiway extension, living and working quarters, aircraft loading areas, and upgrades to existing power plant capabilities. Although AFRICOM officials stated that they expect the number of contractors at Camp Lemonnier to decrease over time as construction is completed, they also stated that they expect the total number of contractor personnel on the African continent to continue to increase and shift from location to location as missions evolve, particularly with regard to special operations. For example, officials from Special Operations Command Africa stated that they are experiencing a significant increase in contracting actions for Combined Joint Task Force-Horn of Africa and that plans are in place to add 10 contingency contracting officers to Special Operations Command Africa for fiscal year 2016. Officials stated that it is extremely important to integrate OCS into planning for the base's expansion. Due to the austere environment, officials stated that they intend to rely on contracted solutions because they are more cost-effective than using military personnel.

**AFRICOM Generally
Accounts for U.S. Citizen
Contractor Personnel but
Does Not Consistently
Account for Third Country
and Local National
Contractor Personnel**

AFRICOM generally accounts for U.S. citizen contractor personnel, but it accounts for third country and local national contractor personnel inconsistently. AFRICOM uses two sources to capture accountability information on contractor personnel supporting DOD operations—daily personnel status reports from the services, and SPOT. According to AFRICOM guidance, military service components, joint task forces, sub-unified commands, and forward operating sites in the AFRICOM area of responsibility are responsible for accounting for all military, DOD civilian, and DOD contractor personnel assigned, attached to, or under their operational control, and they must submit a daily personnel status report to AFRICOM personnel officials via email.²⁹ This information is also to be inputted into military service personnel accountability systems. DOD’s personnel accountability system—Joint Personnel Accountability Reconciliation and Reporting (JPARR)—receives information from various sources, including service-specific accountability databases and SPOT, and generates Joint Personnel Status Reports. AFRICOM personnel officials stated that they have not yet implemented JPARR and are instead using daily personnel status reports from the services via email and SPOT to manually develop Joint Personnel Status Reports and account for contractor personnel. For a depiction of both AFRICOM’s daily personnel status report and SPOT accountability processes, see figure 5.

²⁹See U.S. Africa Command Instruction 1700.05A Personnel Management, (Apr. 4, 2012).

Figure 5: U.S. Africa Command Contractor Personnel Accountability Processes



Source: GAO analysis of AFRICOM and SPOT guidance, and AFRICOM service component command information. | GAO-16-105

Note: The requirement to register contractor personnel in SPOT is incorporated into the company's contract depending on the conditions of the support being provided.

Daily Personnel Status Reports Account for Third Country and Local National Contractor Personnel Inconsistently

AFRICOM's daily personnel status reports generally account for U.S. citizen contractor personnel, but they account for third country and local national contractor personnel inconsistently. AFRICOM officials generally rely on daily personnel status reports from service components via email to provide visibility on the number of personnel on the continent, including the number of contractor personnel. These reports generally account for U.S. contractor personnel, but they do not consistently include local or third country national contractor personnel, or certain U.S. citizen contractor personnel not directly assigned to a U.S. installation. For example, the 414th Contracting Support Brigade in Uganda accounts for local and third country national contractor personnel in its daily personnel status report, but daily personnel status reports from the Air Force in Niger do not. In addition, AFRICOM's daily personnel status reports do not include some U.S. contractor personnel who are not directly working on U.S. installations in a given country. For example, personnel recovery contractor personnel in Niger are not being accounted for in daily personnel status reports because, according to officials, they do not live on the installation.

DOD guidance indicates that combatant commands are to establish policies and procedures to account for contractor personnel. Joint Publication 4-10 indicates that a key to success in contractor management is for geographic combatant commands and subordinate joint force commands to establish clear, enforceable, and well-understood contractor personnel accountability policies and procedures early in the planning stages. The guidance notes that the supported commands must work closely with service components to ensure that proper contract and contractor management oversight is in place.³⁰ The guidance further states that contractor personnel visibility and accountability are essential to determine and provide the needed resources for government support requirements such as life support, force protection, and personnel recovery in uncertain or austere operational environments. Moreover, Chairman of the Joint Chiefs of Staff policy and guidance on personnel accountability³¹ states that the joint personnel status reports developed by combatant commanders are meant to satisfy the commander's information needs and to authenticate the total number of personnel,

³⁰See Joint Pub. 4-10, at V-3 (July 16, 2014).

³¹Chairman of the Joint Chiefs of Staff Manual 3150.13C, Joint Reporting Structure—Personnel Manual (Mar. 10, 2010) (current as of Nov. 6, 2012).

including military, DOD civilian, and DOD contractors, who are physically present in a geographic combatant commander's area of responsibility. Under the policy and guidance, the geographic combatant commander is responsible for reporting the total number of personnel, including DOD contractors, via joint personnel status report to the Joint Staff personnel directorate daily via secure website.

However, this guidance is unclear as to what types of contractors should be accounted for in the joint personnel status report. The Chairman of the Joint Chiefs of Staff guidance identifies SPOT as the designated web-based contractor database and lists the types of contractor personnel included in SPOT—including U.S., local national, host nation, and third country national—but it does not clearly specify the types of contractor personnel to report in the daily personnel status report.³² AFRICOM officials stated that they interpreted this guidance as directing them to account only for U.S. citizen contractor personnel in the daily personnel status reports. Conversely, service component officials at some forward operating sites included both third country and local national, as well as U.S. citizen, contractor personnel in their personnel status reports sent to AFRICOM. AFRICOM guidance indicates that personnel status reports should include all military, civilian, and contractor personnel assigned, attached, or under the operational control of the service component, sub-unified command, joint task force, or forward operating site commander.³³ However, AFRICOM guidance does not specify whether these contractor personnel include third country or local national contractor personnel such as linguists, or U.S. citizen contractor personnel who are under the operational control of the local commander but do not live on the installation. In addition, AFRICOM officials stated that while they receive daily personnel status reports from all of the services, they do not have complete information on how each of the services is collecting this information. Without consistently recording the number of contractor personnel in personnel status reports, AFRICOM cannot comprehensively

³²See *id.*, encl. A, para. 2.a(10); encl. E, para. 13. See *generally id.*, encl. A. The guidance also identifies SPOT as the source of DOD-funded contractor “JPERSTAT-type” information for a geographical combatant command (using the acronym for the joint personnel status report). See *id.*, para. 6.b(3). However, even assuming that a combatant commander uses SPOT to account for each type of contractor personnel (including host nationals), the guidance is not explicit as to whether each type must be reported in the joint personnel status report itself.

³³See U.S. Africa Command Instruction 1700.05A Personnel Management (Apr. 4, 2012).

Contractors Are Not
Consistently Accounting for
Their Employees in SPOT

account for contractor personnel on the continent. Thus, revising the Chairman of the Joint Chiefs of Staff and AFRICOM policy and guidance on personnel accountability to clearly specify the types of personnel to be accounted for in the joint personnel status report would provide AFRICOM with better assurance that its staff consistently provides it with comprehensive information.

We found that not all contractors consistently accounted for their employees in SPOT. Specifically, contractors at two of the three sites we visited are not reporting third country national and local national employees in SPOT. For example, the contractor that manages the primary logistics contract in Uganda reported U.S. citizen, third country, and local national contractor personnel in SPOT in January 2015, but another contractor that manages the primary base services contract at Camp Lemonnier, Djibouti, accounted for U.S. citizen, third country, and local national contractor personnel only in its company systems and not in SPOT. DOD contracting officials subsequently modified the primary base services contract for Camp Lemonnier to include a SPOT accountability requirement specific to Djibouti. Officials from the primary base services company at Camp Lemonnier stated that they have plans to report U.S. citizen and third country national employees in SPOT, but they did not provide a timeframe for doing so. In addition, according to Camp Lemonnier officials, construction contractors building facilities at the site do not account for their U.S. citizen, third country, and local national contractor personnel in SPOT and do not have plans for doing so.

Various provisions in guidance cover the use of SPOT to account for contractor personnel.³⁴ In December 2014 AFRICOM issued an interim policy for the use of SPOT to account for and maintain visibility of contractor personnel in the AFRICOM area of responsibility.³⁵ The guidance states that AFRICOM requires the use of SPOT, or its

³⁴See, e.g., Department of Defense Instruction 3020.41, *Operational Contract Support (OCS)*, encl. 2, para. 3.c (Dec. 20, 2011); 32 C.F.R. § 158.6(c)(3); 48 C.F.R. (DFARS) § 252.225-7040(g). See also Chairman of the Joint Chiefs of Staff Manual 3150.13C, *Joint Reporting Structure—Personnel Manual*, encl. E, para. 13 (Mar. 10, 2010) (current as of Nov. 6, 2012) (identifying SPOT as the central repository for data on all DOD funded contractor personnel—United States, local national, host nation, and third country national).

³⁵U.S. Africa Command Notice 4800.01, *Cancellation of ACI 4800.02A, Use of Synchronized Pre-deployment and Operational Tracker (SPOT) in the U.S. Africa Command Area of Responsibility (AOR)* (Dec. 12, 2014).

successor, to account for contractor personnel in all phases of operations. It states that SPOT is to be used for all U.S. citizens and third country nationals deploying to the area of responsibility, regardless of contract dollar amount. SPOT is also to be used to report an aggregate count of all local nationals on a monthly basis for contracts employing these personnel with periods of performance longer than 30 days.³⁶ AFRICOM's OCS annex to the theater campaign plan indicates that SPOT should be utilized to account for contractor personnel deploying to the area of responsibility and that contracting agencies will direct contractors to input required information, although it does not specify what type of contractor personnel should be registered in SPOT in these provisions.³⁷ In addition, guidance issued by DOD directs the use of clauses that would require contractors to use SPOT to account for certain contractor personnel supporting DOD operations in Djibouti and in Operation United Assistance.³⁸ However, we found that many of the contracts identified by DOD as involving performance in Djibouti or in support of Operation United Assistance did not contain the clauses.³⁹ Although DOD guidance directs the inclusion of the clauses for new contracts providing supplies or services in Djibouti and for Operation United Assistance, and modification of existing contracts to the extent feasible, in some cases there may be a good reason for omitting the clause. For example, if the contract is for hotel lodging, it may not make sense to have hotel employees registered in SPOT. In other contracts where the personnel will be directly supporting operations at DOD facilities, such as those for construction or base support, requiring the contractor to register its personnel in SPOT would help AFRICOM to identify who is supporting its operations and for whom it may be responsible in the event of an emergency.

³⁶SPOT is also to be used for all private security contracts. *See id.*

³⁷The guidance specifies use of SPOT to account for contractors authorized to accompany the force in several provisions, but not in others.

³⁸See Class Deviation 2014-O0005, Requirements for Contractor Personnel Performing in Djibouti (Jan. 13, 2014); Class Deviation 2015-O0003, Contractor Personnel Performing in Support of Operation United Assistance in the United States Africa Command Theater of Operations (Dec. 16, 2014).

³⁹In some instances, the contracts may have contained related clauses requiring the use of SPOT for certain contractor personnel, such as DFARS § 252.225-7040. Although these clauses include information related to SPOT accountability for certain contractor personnel, it may not always be clear which contractor personnel they cover or whether they apply in circumstances such as performance in Djibouti or during Operation United Assistance.

AFRICOM personnel accountability guidance is unclear. As stated earlier, Chairman of the Joint Chiefs of Staff guidance does not specify what types of contractor personnel, such as U.S. citizen, third country national, or local national, should be included in joint personnel status reports. In addition, there are multiple provisions in guidance issued by different sources, requiring the registration of different types of employees in SPOT in various circumstances. Furthermore, AFRICOM's interim guidance generally requiring all contractor personnel in its area of responsibility to be accounted for in SPOT expires in December 2015. AFRICOM officials stated that they intend to request that this interim guidance be included in an updated version of the Defense Federal Acquisition Regulation Supplement. According to DOD officials, as of October 2015, AFRICOM was in the final stages of drafting proposed language to this effect. However, as of November 2015, there have been no changes.

In March 2014, the AFRICOM commander stated that the command is responsible for helping to protect U.S. personnel in Africa.⁴⁰ Without clear accountability guidance, AFRICOM cannot consistently or comprehensively determine how many contractor personnel support DOD operations in the region. Without clarification and deconfliction of guidance, AFRICOM and its subordinate commands will not know what types of contractor personnel to include in personnel status reports and in SPOT, and they could continue to account for these personnel inconsistently. As a result, commanders are at risk of not having comprehensive visibility over who is supporting DOD operations in the area of responsibility. In addition, the AFRICOM area of responsibility lies in an increasingly high threat environment. The Department of State has identified 15 high threat posts on the continent. Without comprehensive and consistent contractor personnel accountability, commanders may be unaware of whom they are responsible for in the event of an emergency.

⁴⁰Statement of AFRICOM Commander General David M. Rodriguez, submitted to the Senate Armed Services Committee, Mar. 6, 2014.

AFRICOM Conducts Limited Vetting of Contractors and Contractor Employees and Does Not Have Guidance to Apply Additional Risk-Based Measures

AFRICOM conducts some limited vetting of potential contractors, also referred to as vendors, but it has not established a foreign vendor vetting process or cell that would preemptively identify vendors who support criminal, terrorist, or other sanctioned organizations. Additionally, in efforts to conduct individual contractor employee screening, AFRICOM sites we visited used different types of background investigations to determine the trustworthiness of contractor employees with access to DOD facilities. However, these AFRICOM forward operating sites were not incorporating additional screening measures, such as biometric screening or counterintelligence interviews, according to the specific risks at each site. As a result, AFRICOM is at risk of not exercising the appropriate level of vendor vetting or contractor employee screening on the African continent.

AFRICOM Conducts Limited Vetting but Does Not Have a Foreign Vendor Vetting Process to Prevent Contracting with Prohibited Entities

AFRICOM conducts some limited vendor vetting, but it has not established a foreign vendor vetting process. The Federal Acquisition Regulation and DOD guidance require contracting officers to ensure that they are not contracting with any prohibited entities by vetting potential vendors' names against a list of prohibited, restricted, or otherwise ineligible persons or entities in the System for Award Management.⁴¹ The System for Award Management is a database used during the procurement process that, among other things, provides information on parties that are prohibited or restricted from receiving federal contracts. In addition to information added by DOD, the database includes entities identified by the Department of Treasury's Office of Foreign Assets Control, Department of State, and other U.S. agencies. All of the AFRICOM service components with whom we conducted interviews stated that their contracting officials do check the prohibited entities list in the System for Award Management. However, as noted by Joint Publication 4-10 in a related discussion, checking certain lists alone may be insufficient. Specifically with respect to two lists maintained by the U.S.

⁴¹ See FAR § 9.405(d); Class Deviation 2014-O0020, *Prohibition on Contracting with the Enemy* (Sept. 17, 2014). After a draft of this report was sent to DOD for comment, DOD issued an updated Class Deviation in September 2015. Although the update may be more limited in scope, generally covering contracts in support of contingency operations in which members of the Armed Forces are actively engaged in hostilities, the requirement for contracting officers to check the exclusions list does not explicitly include this limitation, applying instead to contracts awarded on or before December 31, 2019, to be performed outside the United States and its outlying areas. See Class Deviation 2015-O0016, *Prohibition on Providing Funds to the Enemy and Authorization of Additional Access to Records*, attachment 3 (Sept. 15, 2015).

Department of Treasury, Joint Publication 4-10 indicates that the department has traditionally designated only umbrella organizations.⁴² In addition, officials from all of AFRICOM's service components stated that in their contracting process they use a list of vendors vetted by the local U.S. embassy. However, U.S. Embassy and Department of State headquarters officials stated that vendors on these lists are not vetted for security risks or to determine whether they are connected to or supporting any prohibited organizations; rather, they are vetted only for their ability to provide the required services. As a result, AFRICOM's current vetting process is limited in its ability to ensure that DOD is not funding prohibited organizations in high risk areas.

Current DOD guidance is not clear on what vendor vetting steps or process should be established at each combatant command to mitigate the risk of contracting with terrorist or other prohibited organizations. Joint Publication 4-10 discusses the benefit of establishing a cell, when circumstances warrant, to vet foreign vendors for possible security concerns and avoid awarding contracts to companies that have ties to insurgents.⁴³ However, the guidance does not require the establishment of a vendor vetting cell or specify under what conditions it would be appropriate. Two combatant commands—U.S. Transportation Command and U.S. Central Command—have established foreign vendor vetting cells for this purpose. Although AFRICOM does not have its own foreign vendor vetting cell, during AFRICOM's most recent contingency operation—Operation United Assistance—AFRICOM requested assistance from U.S. Transportation Command's foreign vendor vetting cell to provide threat assessments on all of the vendors that had been awarded AFRICOM contracts. Although U.S. Transportation Command was able to take on this additional workload, AFRICOM does not have a written agreement to use that command's vetting capability, and it may not be able to leverage U.S. Transportation Command's capabilities for future contingencies.

In addition, AFRICOM may not be fully prepared to avoid contracting with vendors who may also be supporting the enemy should it become actively engaged in hostilities. In response to recent statutory provisions regarding contracting with the enemy, DOD has issued guidance for geographic

⁴²See Joint Pub. 4-10, at III-22 (July 16, 2014).

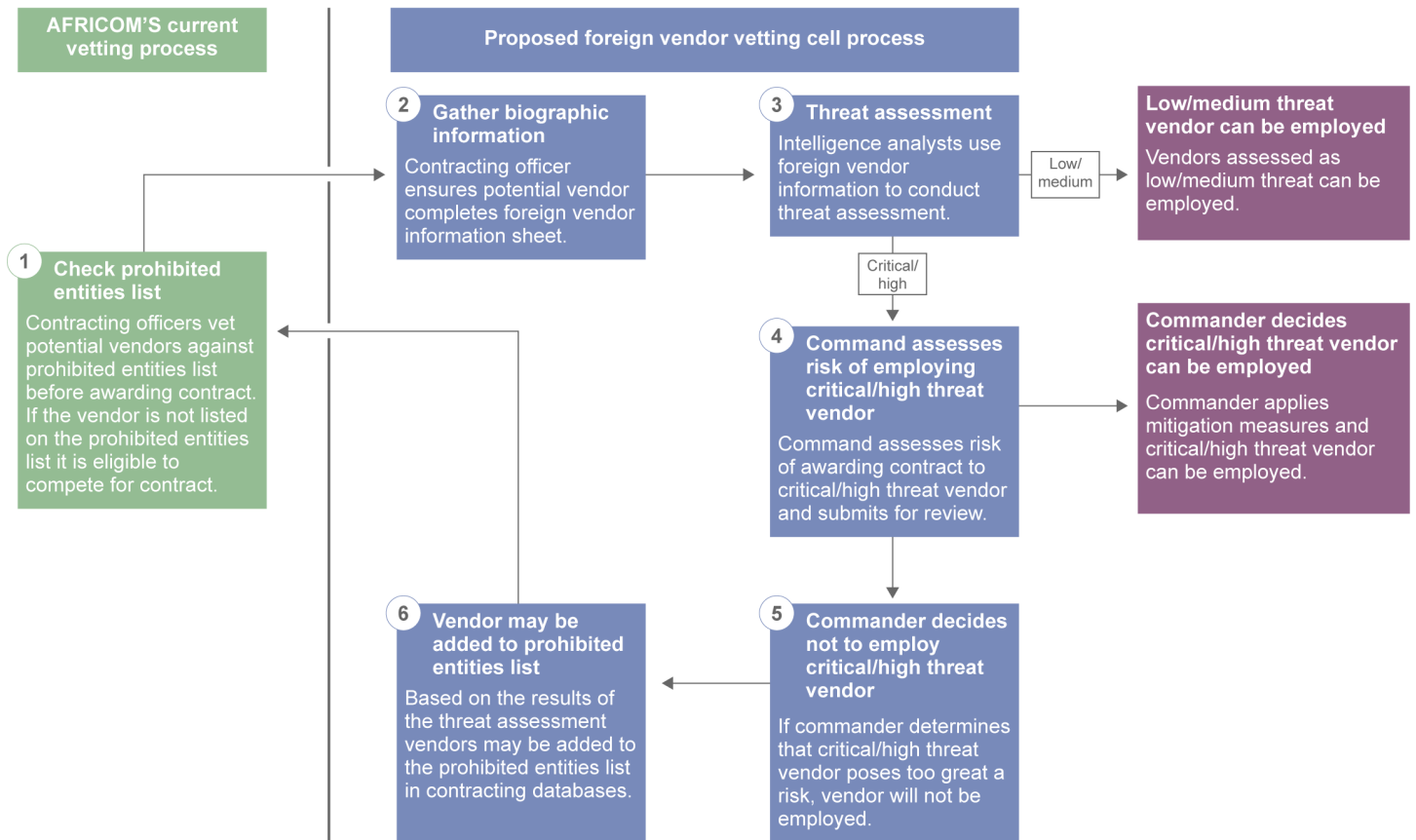
⁴³See *id.* at III-27 to III-28.

combatant commands (with the exception of U.S. Northern Command) to identify persons or entities who directly or indirectly provide funds, including goods and services, received under covered contracts to person or entities that are actively opposing U.S. or Coalition forces in a contingency operation in which the armed forces are actively engaged in hostilities.⁴⁴ According to DOD officials, the list of identified persons and entities is integrated into the System for Award Management. As noted above, the guidance also requires contracting officers to check this database to ensure that contracts are not awarded to prohibited or restricted persons or entities. According to officials, U.S. Central Command is the only combatant command that is currently required to proactively identify these vendors, organizations, and people and add them to the prohibited entities list because it is the only combatant command currently engaged in hostilities in a contingency environment. Although AFRICOM does not currently have any declared contingency operations involving active hostilities, it operates in a high threat environment in which hostilities could quickly arise. Without having a foreign vendor vetting process in place, it will be difficult for AFRICOM to recognize and thereby avoid instances of contracting with the enemy.

AFRICOM officials agree that a foreign vendor vetting process would reduce the risk that they would contract with prohibited entities, and they have drafted guidance on establishing a foreign vendor vetting cell. However, AFRICOM officials stated that they would need specific guidance from the Office of the Secretary of Defense or Joint Chiefs of Staff specifying the conditions under which combatant commands should establish a vendor vetting cell to effectively implement this process. For a description of AFRICOM's current vendor vetting process and how it would be supplemented by the establishment of the foreign vendor vetting cell described in its draft guidance see figure 6.

⁴⁴ See Class Deviation 2015-00016, *Prohibition on Providing Funds to the Enemy and Authorization of Additional Access to Records*, attachment 3 (Sept. 15, 2015). The guidance implements section 841 of the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 (2014) (10 U.S.C. § 2302 note). It superseded earlier guidance implementing provisions from the National Defense Authorization Act for Fiscal Year 2014. See Class Deviation 2014-00020, *Prohibition on Contracting with the Enemy* (Sept. 17, 2014).

Figure 6: U.S. Africa Command's Proposed Foreign Vendor Vetting Process



Source: GAO analysis of U.S. Africa Command (AFRICOM) and service component command information. | GAO-16-105

Note: AFRICOM's proposed vendor vetting process would apply to solicitations or contract awards with an estimated value in excess of \$50,000 that would be performed using foreign vendors.

AFRICOM officials also cited resource limitations, specifically a shortfall in intelligence analyst positions required for the proposed foreign vendor vetting cell, as one of the challenges it faces to establishing a foreign vendor vetting process. We have previously concluded that a risk-based approach can help agencies strategically allocate limited resources to

achieve desired outcomes.⁴⁵ In 2011 we recommended that U.S. Central Command consider a risk-based approach in identifying and vetting the highest-risk foreign vendors.⁴⁶ In response to our recommendation, U.S. Central Command established a formalized risk-based vetting program. Its vetting process is designed to ensure that DOD funds are not used for illicit purposes and to provide a risk management tool to identify foreign vendors that have ties to the insurgency or that are involved in nefarious activities. While the establishment of a foreign vendor vetting cell may not be appropriate for all operations, published DOD guidance specifying under what circumstances and how a vetting cell should be established would better position AFRICOM and other commands to avoid contracting with the enemy in high threat areas or in the event that they become actively engaged in hostilities.

AFRICOM Sites That GAO Visited Use Background Investigations to Screen Contractor Employees but Lack Risk-Based Guidance for Incorporating Additional Screening Measures

AFRICOM generally operates in a high threat area of responsibility, and the screening of non-U.S. personnel entering AFRICOM facilities protects DOD personnel, equipment, and installations from acts of espionage, sabotage, or other intelligence activities. According to agency officials and our observation of contractor personnel screening at the sites we visited, all of the sites conduct some type of background investigation to screen non-U.S. contractors, but Camp Lemonnier, Djibouti—the largest and most enduring site in the AFRICOM area of operations—has the most comprehensive screening process (see table 1 below). The other sites that we visited have incorporated additional screening measures to varying degrees.

⁴⁵For example, see [GAO-11-144](#), *Federal Lands: Adopting a Formal, Risk-Based Approach Could Help Land Management Agencies Better Manage Their Law Enforcement Resources*, (Washington, D.C.: Dec. 17, 2010) and [GAO-09-85](#), *Commercial Vehicle Security: Risk-Based Approach Needed to Secure the Commercial Vehicle Sector*, (Washington, D.C.: Feb. 27, 2009).

⁴⁶[GAO-11-355](#), *Afghanistan: U.S. Efforts to Vet Non-U.S. Vendors Need Improvement*. (Washington, D.C.: June 8, 2011).

Table 1: U.S. Africa Command (AFRICOM) Contractor Employee Screening Measures Vary by Site

Site	Type of site, threat level	Background investigation ^a	Counter-intelligence interview ^b	Biometric screening ^c	Document and media exploitation ^d	Process generally documented in local guidance
Djibouti	Enduring, high threat	Yes, conducted by Department of Defense (DOD)	Limited	Yes	Yes ^e	Yes
Niger	Semi-enduring, high threat	Yes, conducted by DOD and U.S. embassy	Limited	No ^f	No	No ^g
Uganda	Semi-enduring, high threat	Yes, conducted by U.S. embassy or vendor	Limited	Limited to local national drivers	No	No

Source: GAO analysis of DOD and State Department information | GAO-16-105

Notes:

^aA background investigation is the screening of contractors' biographical information against local criminal records and/or US terrorist watch lists and other intelligence databases.

^bA counterintelligence interview is an interview conducted to confirm the trustworthiness of the contractor employee and the information provided for the background investigation.

^cBiometric screening is the screening of an individual's physical characteristics, such as fingerprints or irises, against a biometrically enabled watch list or other biometric intelligence database.

^dDocument and media exploitation is the collection, analysis, and exploitation of captured equipment, personal documents, and media to generate actionable intelligence.

^eIn August 2014, Camp Lemonnier, Djibouti reinitiated contractor employee screening document and media exploitation related operations after an 8 month gap.

^fAir Force officials at the Niger site received three biometric collection kits in Fall 2014, but two of three kits broke soon after their arrival and the officials have since suspended biometric collection as part of its contractor screening process.

^gThe Air Force's Niger site has local security guidance, but it does not describe the contractor screening process currently in place.

Background Investigations

AFRICOM officials stated that all DOD sites in the AFRICOM area of responsibility conduct background investigations for non-U.S. contractors who require base access. All three sites that we visited use background investigations to determine the trustworthiness of third country and local national contractor employees who have access to DOD facilities. Background investigations at the sites we visited generally consist of gathering the contractor employee's biographical information and crosschecking it with U.S. government intelligence sources and against local criminal records. However, the utility of these types of background investigations is limited by the quality of (1) the biographic information provided by the contractors, and (2) local government records, upon which the investigations are based. For example, according to base

access officials, Djiboutian local national contractors are often able to provide the year, but not the specific day and month, in which they were born. In addition, at the sites we visited, DOD and Department of State officials stated that local government criminal records in Africa may not be easily searchable or well-maintained. As a result, additional contractor employee screening measures may be warranted.

Additional Screening Measures

In light of the limitations of background investigations, additional contractor employee screening measures, such as counterintelligence interviews, biometric screening, and document and media exploitation, are incorporated to varying degrees at the three sites we visited (see table 1). For example, counterintelligence interviews with potential contractor personnel can be used to confirm the trustworthiness of the contractor employee and the information provided for the background investigation. While all of the sites we visited conduct counterintelligence interviews to varying degrees, according to DOD officials, none of them conducts interviews with all of its non-U.S. contractor personnel.

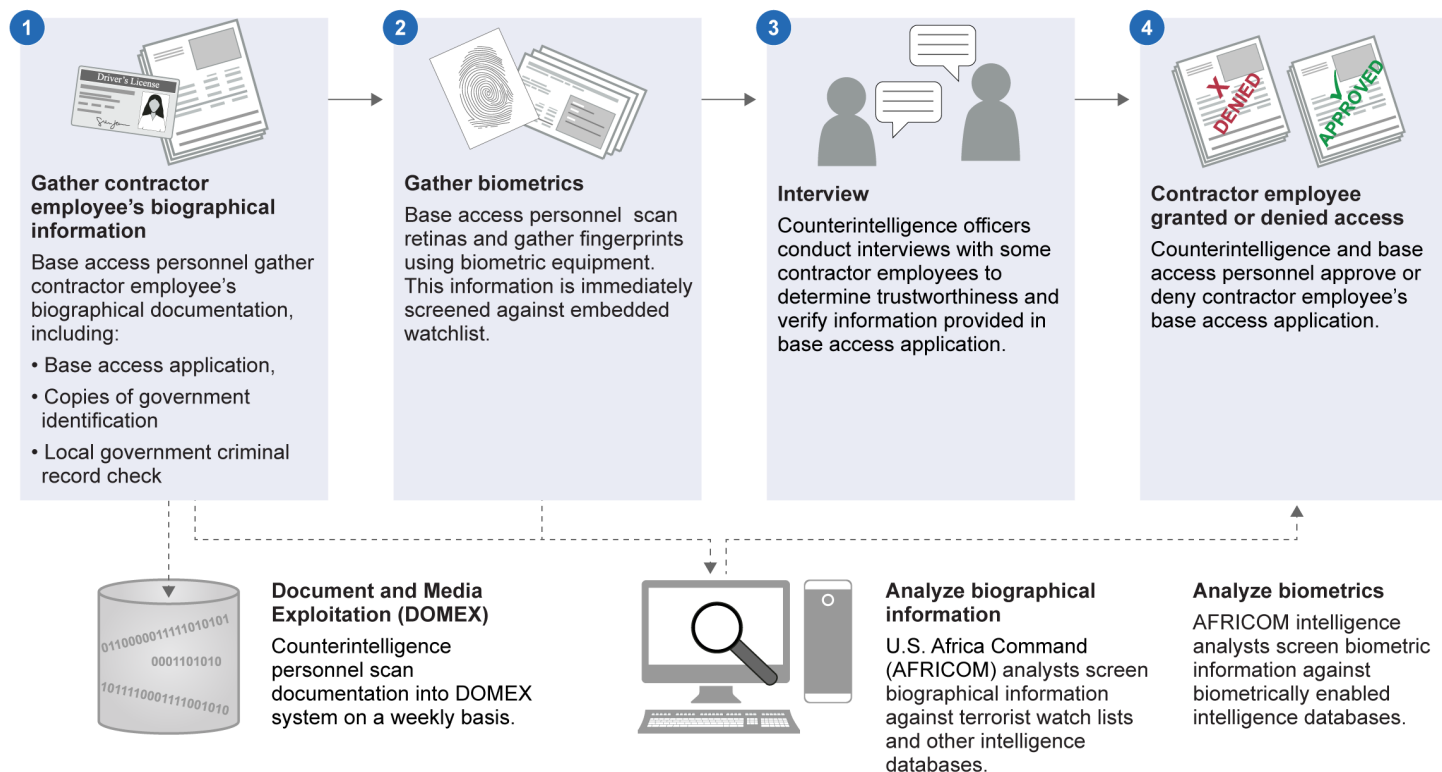
Biometric screening is another measure that can be incorporated into the contractor employee screening process. The collection of biometric information, such as fingerprints or irises, unequivocally links the individual's identity by attaching it to measurable physical characteristics. Officials can then screen this biometric information against a biometrically enabled watch list or other intelligence database. In August 2009 AFRICOM issued a Biometrics Concept of Operations stating that, to the maximum extent allowable under policy and law, persons requiring access to DOD installations in the AFRICOM area of responsibility will be enrolled into a biometrics database.⁴⁷ However, Camp Lemonnier, Djibouti, is the only site we visited that has fully incorporated biometrics screening into its contractor employee screening process. From April to mid-December 2014 Camp Lemonnier, Djibouti, denied access to six contractor personnel after finding derogatory information on them through its biometric screening process.

Security officials at Camp Lemonnier, Djibouti, also use biometric and document and media exploitation systems to upload contractor employees' biometrics and personal documentation to the larger DOD intelligence enterprise (see figure 7). Uploading of personal

⁴⁷AFRICOM Biometric Concept of Operations, Aug. 2009.

documentation into U.S. intelligence databases refers to document and media exploitation, which consists of the collection, analysis, and exploitation of equipment, personal documents, and media to generate actionable intelligence. This information can then be accessed by intelligence officials if the contractor employee attempts to access another DOD site. For example, from April to mid-December 2014 security officials at Camp Lemonnier, Djibouti, placed 30 contractor employees on a watch list based on their negative activity.

Figure 7: Camp Lemonnier, Djibouti, Contractor Employee Screening Process



Source: GAO analysis of Department of Defense (DOD) information. | GAO-16-105

Moreover, with the exception of Camp Lemonnier, Djibouti, contractor employee screening processes are not well-documented in local base security guidance. Joint Publication 4-10 states that commanders must ensure that local screening and badging policies and procedures are in

place for all contractor personnel requiring access to U.S. facilities.⁴⁸ We found that Camp Lemonnier, Djibouti, was the only site of the three we visited that had clearly outlined contractor employee screening processes in local base security guidance. The Air Force's site in Niamey, Niger, has base security guidance, but it does not describe its contractor employee screening process.

One reason cited by officials for not developing local contractor employee screening procedures and policies was that AFRICOM has not yet specified what measures should be incorporated into the sites' contractor employee screening processes. DOD Instruction 2000.12, providing guidance for the DOD Antiterrorism Program, states that combatant commands shall establish antiterrorism policies and programs for the protection of all DOD elements and personnel in their areas of responsibility.⁴⁹ One of the minimum elements of an antiterrorism program is risk management. Antiterrorism risk management includes the determination of how best to employ given resources and force protection measures to deter, mitigate, or prepare for a terrorist incident.⁵⁰ Those measures could include contractor employee screening measures. AFRICOM drafted contractor employee screening guidance in November 2014, which it subsequently updated. As of June 2015, AFRICOM officials stated that the guidance was under review, but they did not provide a timeframe for its issuance. This draft guidance would provide that screening measures, including biometric screening, should be in place when non-U.S. personnel have access to AFRICOM-controlled facilities. The draft guidance contains a detailed appendix that describes under what conditions biometric screening should be conducted, and it discusses document and media exploitation. However, it lacks additional information regarding when other screening measures should be implemented. Officials at the sites we visited stated that access to biometric collection equipment and counterintelligence agents constituted a challenge due to limited resources. As a result, although AFRICOM's draft guidance would direct sites to perform additional screening measures whenever a non-U.S. contractor employee requires access to

⁴⁸Joint Pub. 4-10, at V-25 (July 16, 2014).

⁴⁹Department of Defense Instruction 2000.12, *DOD Antiterrorism (AT) Program*, encl. 2, para. 20.b (Mar. 1, 2012) (incorporating change Sept. 9, 2013).

⁵⁰*See id.* at 29; *see also* Department of Defense Instruction 2000.16, *DoD Antiterrorism (AT) Standards*, encl. 3, para. E3.3 (Oct. 2, 2006) (incorporating change, Dec. 8, 2006).

them, the sites may not have the resources to implement the guidance, when issued.

Furthermore, risk varies from site to site, depending on a number of factors, such as the location's threat profile, operations, and numbers and types of personnel. Risk-based guidance that indicates the specific measures to be incorporated into contractor employee screening processes could better position AFRICOM components to conduct the appropriate level of screening and effectively allocate screening resources to protect DOD personnel and facilities from insider threats.

Conclusions

DOD has spent billions of dollars on contract support since 2002, and as its footprint in Africa increases it is more frequently relying on contractor support for a range of operations to provide logistical, transportation, and intelligence support to AFRICOM's missions. The enhanced capabilities offered by OCS can be a significant force multiplier in every phase of joint and coalition operations in Africa. Conversely, the inability to effectively manage and plan for OCS could yield unintended consequences such as higher costs and inadvertent contracting with vendors that have ties to violent extremist organizations that could complicate or even undermine operational objectives. While AFRICOM has taken steps to manage and plan for OCS, challenges remain in areas such as development of OCS structures, assessments of subordinate command capabilities, accounting of the total number of contractor personnel, and contractor vetting. Several of AFRICOM's subordinate commands—service component and joint force commands—lack organizational structures, such as OCS Integration Cells, with dedicated personnel to manage and plan for OCS. A structure such as an OCS Integration Cell would be particularly useful in a joint environment, such as Combined Joint Task Force-Horn of Africa, due to the number of military service contracting elements operating at the same location, with potentially limited resources. Additionally, clearly defined assessment standards could help AFRICOM to more accurately assess the OCS actions taken by subordinate commands. Furthermore, AFRICOM cannot comprehensively account for DOD contractors on the continent because AFRICOM and joint staff guidance is unclear regarding the types of contractors who should be accounted for and by which personnel accountability process. Clear guidance could help AFRICOM to determine how many contractors support DOD operations in the region, providing commanders with greater visibility over who is supporting DOD operations in the area of responsibility. Also, AFRICOM has not established a foreign vendor vetting process to preemptively identify vendors that support criminal,

terrorist, or other sanctioned organizations, because there is no DOD guidance specifying conditions under which combatant commands should have a vendor vetting process or cell in place to determine whether potential vendors actively support any terrorist, criminal, or other sanctioned organizations. Moreover, there is no guidance clarifying when combatant commands should develop procedures for transmitting names of vendors identified through such a vendor vetting process for inclusion in prohibited entities lists. Finally, not all of the AFRICOM forward operating sites we visited are incorporating additional screening measures according to the specific risks at each site. The development of a foreign vendor vetting process and risk-based employee screening measures could help AFRICOM to determine appropriate levels for vendor vetting and contractor employee screening on the African continent.

Recommendations for Executive Action

We recommend the following seven actions.

To enable AFRICOM's component commands to better plan, advise, and coordinate for OCS, we recommend that the AFRICOM Commander, as part of AFRICOM's ongoing efforts to update related guidance and emphasize the importance of OCS integration at the subordinate command level, take the following actions:

- Direct the service components to designate elements within their respective staffs to be responsible for coordinating OCS, and consider the establishment of an OCS Integration Cell or similar structure with these dedicated OCS personnel, as needed.
- Clarify under what conditions a subordinate joint force command, such as Combined Joint Task Force-Horn of Africa, should establish an OCS Integration Cell.

To enable AFRICOM to better identify, address, and mitigate OCS readiness gaps at its component commands before inaccurate information is incorporated into formal defense readiness reporting systems, we recommend that the AFRICOM Commander take the following action:

- Clarify the scorecard process, including assessment standards, for OCS Readiness Scorecards to ensure that evaluators can accurately assess subordinate commands' OCS capabilities.

To enable AFRICOM to comprehensively and consistently account for contractor personnel in Africa, we recommend that:

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- The Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, direct Joint Staff to clarify what types of contractor personnel should be accounted for in its guidance on personnel status reports.
 - The AFRICOM Commander develop area of responsibility-wide contractor personnel accountability guidance on or before December 2015, when the current guidance expires, that clarifies which types of contractor personnel should be accounted for using SPOT, and when SPOT accountability requirements should be incorporated into contracts.

To ensure that combatant commands are not contracting with entities that may be connected to or supporting prohibited organizations, we recommend that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, take the following action:

- Develop guidance that clarifies the conditions under which combatant commands should have a foreign vendor vetting process or cell in place to determine whether potential vendors actively support any terrorist, criminal, or other sanctioned organizations, including clarifying when combatant commands should develop procedures for transmitting the names of any vendors identified through this process for inclusion in prohibited entities lists in the appropriate federal contracting databases, such as the System for Award Management.

To ensure that AFRICOM applies a risk-based approach to contractor employee screening in Africa, we recommend that the Secretary of Defense take the following action:

- Direct AFRICOM to complete and issue guidance that specifies the standard of contractor employee screening for forward operating sites, based on factors such as the number of DOD personnel on base, type of operations, and local security threat.

Agency Comments and Our Evaluation

In written comments on a draft of this report, DOD concurred with four of our recommendations, partially concurred with two, and did not concur with our recommendation related to AFRICOM contractor personnel accountability guidance. DOD's comments are summarized below and reprinted in appendix II. DOD also provided technical comments, which we incorporated where appropriate.

DOD partially concurred with our first recommendation, that AFRICOM direct its service components to designate elements within their respective staffs to be responsible for coordinating OCS, and consider the

establishment of an OCS Integration Cell or similar structure with dedicated OCS personnel. DOD stated that AFRICOM is assessing its subordinate commands' OCS structures to determine the best way forward, and acknowledges that there are clear advantages and benefits to establishing an OCS Integration Cell at the service-component level even though there is no doctrinal requirement to do so. As we discuss in the report, while joint staff guidance does not require the establishment of an OCS Integration Cell or dedicated OCS personnel at the service component command level, joint staff has emphasized the benefits of using an OCS Integration Cell to synchronize requirements and coordinate contracting actions. This recommendation was intended to provide service component commands with the flexibility to develop OCS Integration Cells or similar structures with dedicated OCS personnel who can address these concerns. Moreover, an OCS Integration Cell or similar structure could help identify contract support issues early in the requirements development process, thereby enabling the service component commands to avoid delays in receiving needed equipment or services. Further, this designation would better ensure AFRICOM's component commands effectively plan, advise, and coordinate OCS activities and meet the intent of the recommendation.

DOD concurred with our second recommendation, that AFRICOM clarify under what conditions a subordinate joint force command, such as Combined Joint Task Force-Horn of Africa, should establish an OCS Integration Cell. In its comments, AFRICOM stated that all subordinate joint force commands should establish an OCS Integration Cell. AFRICOM further stated that it had scheduled a staff assistance visit to Combined Joint Task Force-Horn of Africa to assess and develop a plan for establishing an OCS Integration Cell. We acknowledge that AFRICOM's statement in its comments clarifies that an OCS Integration Cell should be established at a subordinate joint force command, and believe that the scheduling of a staff assistance visit to Combined Joint Task Force-Horn of Africa is a positive first step toward establishing a cell there. However, we also believe that providing that clarification in AFRICOM guidance would better ensure the establishment of such a cell at various types of subordinate joint force commands. As we noted in the report, an OCS Integration Cell was established at AFRICOM's subordinate joint force command supporting Operation United Assistance in 2014, but not at the Combined Joint Task Force-Horn of Africa in Djibouti, or Special Operations Command Africa. Furthermore, AFRICOM officials stated they conducted a staff assistance visit to Combined Joint Task Force-Horn of Africa in August 2015 to assess and develop a plan to establish an appropriate OCS structure there. Guidance clarifying

under what conditions a subordinate joint force command should establish an OCS Cell, if fully implemented, would meet the intent of our recommendation.

DOD partially concurred with the third recommendation, that AFRICOM clarify the scorecard process, including assessment standards, for OCS Readiness Scorecards to ensure that evaluators can accurately assess subordinate commands' OCS capabilities. DOD stated that the scorecard is a command initiative designed to drive discussion about OCS issues with subordinate commands, but is not a replacement for the Defense Readiness Reporting System to report OCS. We agree that the scorecard is not such a replacement. However, as noted in the report, AFRICOM officials stated that they plan to incorporate OCS scorecards into the Defense Readiness Reporting System, the system used to gauge readiness across DOD. This recommendation was intended to ensure that OCS scorecard assessment standards are clearly defined so that AFRICOM can accurately assess OCS actions taken by subordinate commands. Without improvements, either full or partial incorporation of the scorecard assessments into DOD's readiness reporting system could compromise the integrity of that system by capturing an inaccurate picture of OCS readiness.

DOD concurred with our fourth recommendation, that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, direct Joint Staff to clarify what types of contractor personnel should be accounted for in its guidance on personnel status reports. In its comments, DOD stated that Chairman of the Joint Chiefs of Staff Manual 3150.13C, Joint Personnel Reporting Structure-Personnel Manual provides policy and guidance on what types of contractor personnel to account for in personnel status reports, but that additional training and amplifying local procedures issued by AFRICOM's personnel directorate may be needed to fully implement its provisions and ensure consistent interpretation of the guidance. As we noted in the report, the Chairman of the Joint Chiefs of Staff guidance identifies SPOT as the designated web-based contractor database and lists the types of contractor personnel included in SPOT—including U.S., local national, host nation, and third country national—but it does not clearly specify the types of contractor personnel to report in the daily personnel status report, and as a result, service component officials at some forward operating sites inconsistently included various types of contractors in personnel status reports. While we believe that additional guidance provided by AFRICOM's personnel directorate would provide further clarification on this issue, we continue to believe that clarifying Joint Staff guidance to clearly specify the types of

contractor personnel to be accounted for in joint personnel status reports would provide AFRICOM better assurance that its staff consistently provides it with comprehensive information.

DOD did not concur with the fifth recommendation, that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, direct AFRICOM to develop area of responsibility-wide contractor personnel accountability guidance on or before December 2015, when the current guidance expires, that clarifies which types of contractor personnel should be accounted for using SPOT and when SPOT accountability requirements should be incorporated into contracts. DOD stated that there is not a requirement for the Secretary of Defense to direct AFRICOM to develop this guidance. We agree that it may not be necessary for the Secretary of Defense to direct this action and accordingly adjusted the language of the recommendation directly to AFRICOM. Additionally, DOD stated it is coordinating a draft class deviation to the Defense Federal Acquisition Regulation Supplement on accountability requirements for contractor personnel performing in the AFRICOM area of responsibility, which it expects to be approved and published by December 2015. We acknowledge that this class deviation, when completed, may provide further clarity on the types of contractor personnel to include in SPOT. However, we continue to believe that AFRICOM could benefit from developing and issuing contractor personnel accountability guidance for its area of responsibility. Specifically, as we noted in the report, there have been no changes to the Defense Federal Acquisition Regulation Supplement to date on this topic, DOD has not issued a Class Deviation, and AFRICOM's existing interim guidance expires in December 2015. Thus, we continue to believe that clear accountability guidance would enable AFRICOM to more consistently and comprehensively determine how many contractor personnel support DOD operations in the region.

DOD concurred with our sixth recommendation, that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, develop guidance that clarifies the conditions under which combatant commands should have a foreign vendor vetting process or cell in place to determine whether potential vendors actively support any terrorist, criminal or other sanctioned organizations, including clarifying when combatant commands should develop procedures for transmitting the names of any vendors identified through this process for inclusion in prohibited entities list in the appropriate federal contracting databases, such as the System for Award Management. In its comments, DOD stated that OSD has established a joint working group to identify key

stakeholders and develop DOD policy requiring combatant commands to develop foreign vendor vetting processes. When fully implemented, we believe these actions would meet the intent of our recommendation.

DOD concurred with our seventh recommendation, that AFRICOM continue to complete and issue guidance that specifies the standard of contractor employee screening for forward operating sites, based on factors such as the number of DOD personnel on base, type of operations, and local security threat. In its comments, DOD stated that AFRICOM has completed the staffing of a draft instruction that will provide guidance and specify the standards for contractor employee screening for forward operating sites, including a risk-based approach to contractor employee screening based on applicable mitigating factors that include the type of contractor, operations and local security threat. While we have not seen an updated version of this draft guidance that includes a risk-based approach to screening, if it is fully implemented as described above, it would meet the intent of our recommendation.

We are providing copies of this report to the appropriate congressional committees, the Secretary of Defense, the Chairman of the Joint Chiefs of Staff and the AFRICOM Commander. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-5431 or russellc@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "Cary Russell". The signature is written in a cursive, flowing style.

Cary B. Russell
Director, Defense Capabilities and Management

Appendix I: Objectives, Scope, and Methodology

The objectives of our review were to determine the extent to which AFRICOM: (1) has an organizational structure in place to manage, plan for, and assess operational contract support; (2) accounts for contractor personnel in its area of responsibility; and (3) vets non-U.S. contractors and contractor employees. The focus of this review was on AFRICOM and its subordinate commands, including the service component commands, as well as Special Operations Command Africa in Europe, and the Combined Joint Task Force-Horn of Africa at Camp Lemonnier in Djibouti. Further, in terms of our review of AFRICOM contractor personnel accountability and contractor vetting, our scope included only contract support on the African continent, excluding contract support located at AFRICOM headquarters.

To determine the extent to which AFRICOM has an organizational structure in place to manage, plan for, and assess operational contract support, we gathered information from and conducted interviews with officials at AFRICOM headquarters, as well as the AFRICOM service component command headquarters in Europe. To determine the extent to which AFRICOM assesses OCS capabilities, we evaluated the OCS readiness scorecards created by AFRICOM J4 (Logistics Directorate) to measure its service components' OCS capabilities in 2014. In its assessment of the component commands, AFRICOM J4 rated each service component as compliant, partially compliant, or non-compliant with OCS tasks for four performance measure categories: planning, policy, operations/exercises/security cooperation, and administration. We evaluated the ratings that J4 applied to the service components in these categories to determine whether they were accurate. Specifically, to evaluate the accuracy of the scorecard ratings, we validated the ratings using evidence gathered from the service components and compared ratings of the service components with similar conditions against one another to determine whether they received the same ratings. To evaluate the extent to which AFRICOM plans for OCS, we reviewed OCS annexes—Annex W's—to AFRICOM's theater campaign plan and its regional campaign plans to determine the extent to which they included key OCS concepts outlined in DOD and joint staff guidance.

To determine the extent to which AFRICOM accounts for contractor personnel, we reviewed DOD, AFRICOM, and Joint Staff personnel accountability guidance and interviewed AFRICOM J1 officials, as well as military service officials with personnel accountability responsibilities at the AFRICOM forward operating sites we visited. In addition, we reviewed contracts with place of performance in Djibouti from March 2013 to February 2014, as well as Operation United Assistance (OUA) contracts

from December 2014 to February 2015 listed in the All Government Contract Spend data, to determine whether they included clauses to register employees supporting the contracts in the Synchronized Predeployment and Operational Tracker (SPOT). The different timeframes used for the selection of those contracts were based, in part, on the timing of various DOD requirements to use clauses that included SPOT-related provisions. Finally, we reviewed monthly SPOT data from 2011 to 2015 provided by AFRICOM personnel officials to determine whether the numbers of contractor personnel had increased or decreased within the past 5 years. We conducted a data reliability analysis of this information, including corroborating the data with agency officials to ensure that it is accurate, up-to-date and reasonable. We determined the data to be sufficient and reliable for the purposes of this report.

To determine the extent to which AFRICOM vets contractors and contractor employees we reviewed DOD and military department contracting, anti-terrorism, and physical security guidance and compared it to information gathered from AFRICOM J2X (counterintelligence) and three forward operating sites concerning their vendor vetting and contractor employee screening processes. In addition, we observed contractor screening and base access procedures at the forward operating sites in Djibouti, Niger, and Uganda. We selected these locations based on variations in the military services represented, the types of contractors (U.S., third country, and local national), and the types of contract services provided. The information gathered from these three sites, while not generalizable to all AFRICOM sites, provides valuable insights about personnel accountability, contractor vetting, and contractor employee screening processes in the AFRICOM area of responsibility.

We visited or contacted officials from the following DOD organizations during our review:

Department of Defense

- Office of the Under Secretary of Defense for Acquisition, Technology and Logistics
- Defense Procurement and Acquisition Policy Directorate
- Office of the Under Secretary of Defense for Personnel and Readiness
- Office of the Under Secretary of Defense for Intelligence
- Chairman of the Joint Chiefs of Staff
- Joint Staff J-4 (Logistics) Directorate
- AFRICOM Headquarters, Stuttgart, Germany
- AFRICOM J-1 (Personnel) Directorate, Stuttgart, Germany

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- AFRICOM J-2 (Intelligence) Directorate, Stuttgart, Germany
 - AFRICOM J-3 (Operations) Directorate, Stuttgart, Germany
 - AFRICOM J-4 (Logistics) Directorate, Stuttgart, Germany
 - Special Operations Command Africa, Stuttgart, Germany
 - Special Operations Forward – Eastern Area, Uganda
 - Special Operations Forward – Central Area, Uganda
 - Combined Joint Task Force-Horn of Africa
 - J-1 (Personnel) Directorate, Camp Lemonnier, Djibouti
 - J-2 (Intelligence) Directorate, Camp Lemonnier, Djibouti
 - J-3 (Operations) Directorate, Camp Lemonnier, Djibouti
 - J-4 (Logistics) Directorate, Camp Lemonnier, Djibouti
 - J-5 (Plans) Directorate, Camp Lemonnier, Djibouti
 - Contingency Contracting Office, Camp Lemonnier, Djibouti

Department of the Air Force

- U.S. Air Forces in Europe–Air Forces Africa, Ramstein, Germany
- U.S. Air Force 449th Air Expeditionary Group, Camp Lemonnier, Djibouti
- 768th Air Expeditionary Squadron at Niamey, Niger
- Contracting Office, Niamey, Niger
- Security Forces and Office of Special Investigations, Niamey, Niger
- Air Force A-1 (Personnel), Niamey, Niger

Department of the Army

- Office of the Deputy Chief of Staff, G-4 (Logistics), Washington, D.C.
- U.S. Army Africa, Vicenza, Italy
- G-1 (Personnel) Directorate, Vicenza, Italy
- G-2 (Intelligence) Directorate, Vicenza, Italy
- G-4 (Logistics) Directorate, Vicenza, Italy
- 414th Contract Support Brigade, Vicenza, Italy
- Air Force Office of Special Investigations, Niamey, Niger

Department of the Navy

- Deputy Assistant Secretary of the Navy – Acquisition and Procurement, Washington, D.C.
- U.S. Naval Forces Europe–Africa, Naples, Italy
- Naval Forces Africa N-4 (Logistics) Directorate, Naples, Italy
- Naval Forces Africa N-1 (Personnel) Directorate, Naples, Italy
- Naval Facilities Command Europe, Africa, Southwest Asia, Naples, Italy
- Naval Supply Systems Command, Fleet Logistics Center Sigonella, Naples, Italy
- U.S. Marine Corps Forces Europe and Africa, Stuttgart, Germany
- Special Purpose Marine Air Ground-Task Force, Uganda
- U.S. Naval Camp Lemonnier, Djibouti

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- N-1 (Personnel), Camp Lemonnier, Djibouti
 - Public Works Office/Contracting Office, Camp Lemonnier, Djibouti
 - Base Access Control Office, Camp Lemonnier, Djibouti
 - Naval Criminal Investigative Services, Camp Lemonnier, Djibouti

Department of State

- Office of Acquisitions Management, Washington, D.C.
- Office of Logistics Management, Washington, D.C.
- Bureau of African Affairs, Washington, D.C.
- Bureau of Diplomatic Security, Washington, D.C.
- U.S. Embassy, Djibouti, Djibouti
- U.S. Embassy, Niamey, Niger
- U.S. Embassy, Kampala, Uganda

We conducted this performance audit from June 2014 to December 2015 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.

Appendix II: Comments from the Department of Defense

GAO sent a draft of this report to DOD for comment on July 2, 2015, identified as GAO-15-679. GAO received DOD's comments on November 20, 2015. The report number was changed to GAO-16-105 to reflect the appropriate fiscal year of issuance.



HEADQUARTERS
UNITED STATES AFRICA COMMAND
Unit 29951
APO AE 09751

J1/8

MEMORANDUM FOR Defense Capabilities Management (Attn: Cary Russell, Director), U.S. Government Accountability Office, 441 G Street NW, Washington DC 20548

SUBJECT: Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report, GAO-15-179

1. This is the DoD response to the GAO Draft Report, GAO-15-179, 'OPERATIONAL CONTRACT SUPPORT: Additional Actions Needed To Manage, Account For, and Vet Defense Contractors in Africa,' dated July 2, 2015 (GAO Code 351933). Detailed comments on the report recommendations are enclosed.
2. The U.S. Africa Command (USAFRICOM) concurs or partially concurs with GAO recommendations one, two, three, and seven. USAFRICOM non-concurs with recommendation five since the Command is already addressing the issue identified in the GAO recommendation: AOR-wide contractor personnel accountability. This DoD response reflects the Director, Joint Staff's concurrence to recommendations four and six.
3. Should you have any questions or require clarification, please contact MAJ Shaalim David at Shaalim.h.david.mil@mail.mil or telephone at +49-711-729-2826.

A handwritten signature in black ink, appearing to read "R. Maxwell".

ROBERT M. MAXWELL, SES
Director of Resources (J1/8)

Enclosure:
DoD response to GAO Draft Report

GAO DRAFT REPORT DATED JULY 2, 2015
GAO-15-679 (GAO CODE 351933)

“OPERATIONAL CONTRACT SUPPORT: ADDITIONAL ACTIONS NEEDED TO
MANAGE, ACCOUNT FOR, AND VET DEFENSE CONTRACTORS IN AFRICA”

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION

RECOMMENDATION 1: The GAO recommends that AFRICOM direct its service components to designate elements within their respective staffs to be responsible for coordinating OCS, and consider the establishment of an OCS Integration Cell or similar structure with these dedicated OCS personnel, as needed.

USAFRICOM RESPONSE: Partially concur.

COMMENTS: Establishment of an OCS Integration Cell (OCSIC) at the Geographic Combatant Command and, when formed, at the subordinate joint force command level (JFC) is not only appropriate, but also necessary to ensure OCS-related matters are synchronized and optimized to support the mission. Although there are clear advantages and benefits to establishing an OCSIC at service-component level, there exists no doctrinal requirements for service components to do so. However, USAFRICOM is currently assessing its Subordinate Commands OCS structures to determine the best way forward, including its inherent authority to direct Subordinate Commands to establish their respective OCSIC. Absent an established OCSIC or dedicated OCS personnel, OCS planning and coordination would defer to assigned logistics planners.

RECOMMENDATION 2: The GAO recommends that AFRICOM clarify under what conditions a subordinate joint force command, such as Combined Joint Task Force-Horn of Africa, should establish an OCS Integration Cell.

USAFRICOM RESPONSE: Concur.

COMMENTS: All USAFRICOM subordinate joint force commands should establish an OCSIC. A USAFRICOM staff assistance visit of CJTF-HOA is scheduled for the third quarter of FY 2015 to assess and develop plan for establishment of an OCSIC.

RECOMMENDATION 3: The GAO recommends that the AFRICOM clarify the scorecard process, including assessment standards, for OCS Readiness Scorecards to ensure that evaluators can accurately assess subordinate commands' OCS capabilities.

USAFRICOM RESPONSE: Partially concur.

COMMENTS: OCS Readiness Scorecard assessment standards have been sent to the subordinate commands for feedback/comments. The OCS readiness scorecard, however, is not designed to replace the Defense Readiness Reporting System (DRRS) to report on OCS. The OCS scorecard was a Command initiative, subject to continuous improvement, to drive

discussion, tell USAFRICOM story, and highlight areas requiring focused efforts. In fact, when this initiative was brought to the attention of the GAO auditors, the preliminary feedback from the latter was that the OCS readiness scorecard may be considered a “benchmark” or a “best practice” in OCS execution.

RECOMMENDATION 4: The GAO recommends that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff direct Joint Staff to clarify what types of contractor personnel to account for in its guidance on personnel status reports.

USAFRICOM RESPONSE: Concur.

COMMENTS: The CJCSM 3150.13C, Joint Personnel Reporting Structure-Personnel Manual, provides policy and guidance on what types of contractor personnel to account for in personnel status reports. However, additional training and amplifying local procedures issued by the USAFRICOM J-1 may be necessary to fully implement its provisions and ensure consistent interpretation. While USAFRICOM J-1 issuance of a coordinated directive on local policies, procedures and standards would mitigate many of the interpretation issues, lessons from USAFRICOM’s implementation of the policy will be incorporated into the next update of the CJCSM 3150.13C.

RECOMMENDATION 5: The GAO recommends that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff direct AFRICOM to develop area of responsibility-wide contractor personnel accountability guidance on or before December 2015, when the current guidance expires, that clarifies which types of contractor personnel should be accounted for using SPOT and when SPOT accountability requirements should be incorporated into contracts.

USAFRICOM RESPONSE: Non-concur.

COMMENTS: There is no requirement for the Secretary of Defense to direct AFRICOM to develop area of responsibility-wide contractor personnel accountability guidance on or before December 2015. A draft Synchronized Pre-deployment and Operational Tracker (SPOT) Defense Federal Acquisition Regulation Supplement (DFARS) deviation clause for USAFRICOM area of responsibility-wide contractor personnel accountability is already being coordinated with the respective USAFRICOM staff and subordinate commands via the Task Management Tool (TMT) System. After USAFRICOM/subordinate staff coordination, the draft SPOT DFARS deviation clause will be submitted to OSD/Defense Procurement and Acquisition Policy (DPAP) for review and approval. USAFRICOM expects the SPOT DFARS deviation clause to be approved and published before Dec 2015.

RECOMMENDATION 6: The GAO recommends that the Secretary of Defense, in coordination with the Chairman of the Joint Chiefs of Staff, develop guidance that clarifies the conditions under which combatant commands should have a foreign vendor vetting process or cell in place to determine whether potential vendors actively support any terrorist, criminal, or other sanctioned organizations, including clarifying when combatant commands should develop procedures for transmitting the names of any vendors identified through this process

for inclusion in prohibited entities lists in the appropriate federal contracting databases, such as the System for Award Management.

USAFRICOM RESPONSE: Concur.

COMMENTS: The OSD has established a joint working group to identify key stakeholders and develop DoD policy requiring CCMDs to develop foreign vendor vetting processes.

RECOMMENDATION 7: The GAO recommends that AFRICOM continue to complete and issue guidance that specifies the standard of contractor employee screening for forward operating sites, based on factors such as the number of DOD personnel on base, type of operations, and local security threat.

USAFRICOM RESPONSE: Concur.

COMMENTS: AFRICOM has completed the staffing of their existing "DRAFT" Instruction which is currently with the Chief of Staff awaiting signature. This Instruction will provide guidance and specify the standards for Contractor employee screening for forward operating sites in the AOR. The guidance includes a risk-based approach to Contractor employee screening based on applicable mitigating factors that include type of contractor (US or non-US), type of operations, and local security threat.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Carole Coffey and James A. Reynolds, Assistant Directors; Gregory Hellman; Courtney Reid; Michael Shaughnessy; Michael Silver; Amie Steele; Cheryl Weissman; and Amanda Weldon made key contributions to this report.

Related GAO Products

Operational Contract Support: Actions Needed to Enhance the Collection, Integration, and Sharing of Lessons Learned. [GAO-15-243](#). Washington, D.C.: March 16, 2015.

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