



November 2017

INSPECTORS GENERAL

Documented Agreement of Certain Roles and Responsibilities Could Further Enhance Coordination in Afghanistan

GAO updated page 33 on [November 21, 2017] to more clearly reflect the entities that are party to the 2015 MOU between the OIGs at DOD, State, and USAID, and other investigative entities.

GAO Highlights

Highlights of [GAO-18-6](#), a report to the Committee on Armed Services, U.S. Senate

Why GAO Did This Study

Congress relies on SIGAR and the OIGs of DOD, State, and USAID to provide oversight of the wide range of operations and significant funds spent in Afghanistan. The Senate Armed Services Committee's report accompanying the NDAA for Fiscal Year 2017 included a provision for GAO to review the authorities and activities of SIGAR and the OIGs at DOD, State, and USAID (the four OIGs) regarding their oversight of U.S. operations in Afghanistan.

The objectives of this report include examining the extent to which (1) overlap, if any, exists in the mandates for the four OIGs and (2) the four OIGs have coordinated their oversight to help prevent duplication. GAO identified and compared provisions of applicable laws; reviewed the four OIGs' oversight products, strategic plans, and quarterly reports; interviewed officials at the four OIGs about the coordination processes; and analyzed objectives of reports that the four OIGs issued.

What GAO Recommends

To help prevent duplication of efforts and minimize agencies' reporting burden, GAO recommends that SIGAR and DOD OIG, as Lead IG for Operation Freedom's Sentinel, document agreed-upon roles and responsibilities for meeting their reporting requirements. In the OIGs' joint response, the four IGs concurred with the recommendations, but expressed concerns about balance in the report title and Highlights. In separate comments, SIGAR had similar concerns. GAO made modifications to the report to clarify these issues.

View [GAO-18-6](#). For more information, contact Beryl H. Davis at (202) 512-2623 or davisbh@gao.gov.

November 2017

INSPECTORS GENERAL

Documented Agreement of Certain Roles and Responsibilities Could Further Enhance Coordination in Afghanistan

What GAO Found

Overlap exists among the mandates of the four Offices of Inspector General (OIG) that conduct and report on oversight activities for U.S. operations in Afghanistan.

- The National Defense Authorization Act (NDAA) for Fiscal Year 2008 established the Special Inspector General for Afghanistan Reconstruction (SIGAR). The OIGs for the Department of Defense (DOD), Department of State (State), and U.S. Agency for International Development (USAID)—the primary agencies with programs and operations in Afghanistan—conduct oversight of their respective agencies in accordance with the Inspector General Act of 1978, as amended (IG Act). This results in overlap of responsibilities as SIGAR is required to oversee and report on Afghanistan reconstruction while the OIGs at DOD, State, and USAID are required to oversee and report on their respective agencies' programs and operations, including those related to Afghanistan reconstruction.
- The NDAA for Fiscal Year 2013 created a Lead Inspector General (Lead IG) role for overseas contingency operations, which is assigned to DOD OIG for Operation Freedom's Sentinel in Afghanistan. Because this requires the Lead IG to review the accuracy of information that federal agencies provide to support the contingency operation, potential overlap exists with SIGAR and the OIGs at State and USAID as they perform their duties and responsibilities under their general oversight authorities.
- Both SIGAR and the Lead IG are subject to statutory requirements to report on a quarterly basis on the overall conduct of the federal programs and operations within the scope of their oversight.
- The Lead IG is required to biannually report on the activities of the State and USAID OIGs related to Operation Freedom's Sentinel, while these OIGs are also subject to the general semiannual reporting requirements of the IG Act.

To help prevent duplication, these mandates include provisions requiring SIGAR and the other OIGs to coordinate their oversight activities. SIGAR and the other OIGs have established coordination mechanisms to help prevent duplication of oversight activities related to U.S. operations in Afghanistan. GAO reviewed the objectives of 137 audit, inspection, and evaluation reports issued by the four OIGs from January 1, 2015, through September 30, 2016, and did not identify duplicate objectives among these reports. GAO also reviewed 43 special projects issued by SIGAR and did not identify any duplication between these products and the reported objectives of the reports that the OIGs issued. However, SIGAR and DOD IG, as the Lead IG, have not documented their agreed-upon roles and responsibilities for obtaining data from agencies and other OIGs used to prepare their mandated reports. According to GAO's leading practices for effective interagency collaboration, documenting significant items that affect collaborative agreements could enhance coordination and strengthen the commitment to working collaboratively. Without documented agreement on roles and responsibilities to address overlapping areas in their reports, there is increased risk that SIGAR and DOD OIG could (1) duplicate requests for information, resulting in unnecessary burden on agencies responding to them, and (2) duplicate efforts in meeting their respective reporting requirements.

Contents

Letter		1
	Background	4
	Scope of Enabling Legislation Results in Overlap in the Statutory Mandates for OIG Oversight of U.S. Operations in Afghanistan	8
	Oversight Activities and Primary Areas of Focus for the Inspectors General with Oversight Responsibilities in Afghanistan	18
	OIG Coordination Helped Prevent Duplication in Oversight Activities, but Agreed-Upon Roles and Responsibilities for Reporting Have Not Been Documented	29
	Conclusions	37
	Recommendations for Executive Action	37
	Agency Comments and Our Evaluation	38
Appendix I	Objectives, Scope, and Methodology	42
Appendix II	Joint Comments from SIGAR and the Offices of Inspector General at DOD, State, and USAID	46
Appendix III	Comments from the Special Inspector General for Afghanistan Reconstruction	49
Appendix IV	Comments from the U.S. Agency for International Development Office of Inspector General	53
Appendix V	GAO Contact and Staff Acknowledgments	55
Tables		
	Table 1: FTEs for Offices of Inspector General Providing Oversight Activities in Afghanistan, by Position and Location, as of September 30, 2016	7

Table 2: Summary of Oversight Areas, Major Duties and Responsibilities, and Select Authorities for Offices of Inspector General Related to U.S. Operations in Afghanistan	9
Table 3: Summary of Reporting Requirements for Offices of Inspector General Related to U.S. Operations in Afghanistan	13
Table 4: Type and Number of Reports Issued by OIGs Providing Oversight of U.S. Operations in Afghanistan, from January 1, 2015, through September 30, 2016	20
Table 5: Reports Issued by Offices of Inspector General Providing Oversight of U.S. Operations in Afghanistan, by Strategic Oversight Area, from January 1, 2015, through September 30, 2016	23

Figure

Figure 1: SIGAR and Lead Inspector General (Lead IG) Data Call Processes Used to Meet Mandated Reporting Requirements	35
---	----

Abbreviations

ANSF	Afghan National Security Forces
CIGIE	Council of the Inspectors General on Integrity and Efficiency
COP-OCO	Comprehensive Oversight Plan for Overseas Contingency Operations
COPSWA	Comprehensive Oversight Plan for Southwest Asia
DOD	Department of Defense
FTE	full-time equivalent
GAGAS	generally accepted government auditing standards
IG	inspector general
IG Act	Inspector General Act of 1978, as amended
Lead IG	Lead Inspector General
MOU	memorandum of understanding
NATO	North Atlantic Treaty Organization
NDAA	National Defense Authorization Act
OIG	Office of Inspector General
SIGAR	Special Inspector General for Afghanistan Reconstruction
State	Department of State
USAID	U.S. Agency for International Development

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



November 2, 2017

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

Over the years, GAO has reported on the dangerous security environment in Afghanistan, the prevalence of corruption, and the limited capacity of the Afghan government to deliver services and sustain donor-funded projects.¹ Since the terror attacks of September 11, 2001, Congress has appropriated hundreds of billions of dollars for U.S. military operations and U.S. diplomatic, reconstruction, and relief operations in Afghanistan. Given the challenging environment in Afghanistan and the significant U.S. investment, effective oversight of U.S. funds and operations in Afghanistan is critical. Federal offices of inspectors general (OIG) serve as a primary oversight tool, which helps ensure the efficiency and effectiveness of federal programs and operations.

Federal OIGs assist in the oversight of funds appropriated for U.S. operations in Afghanistan for reconstruction, capacity building, and combating the proliferation of terrorism. The federal agencies with programs and operations in Afghanistan, such as the Department of Defense (DOD), Department of State (State), and U.S. Agency for International Development (USAID), have OIGs authorized by the Inspector General Act of 1978, as amended (IG Act), to oversee their respective agencies' operations.² In addition to these agencies' OIGs, in 2008, Congress established a Special Inspector General for Afghanistan Reconstruction (SIGAR) to provide oversight of Afghanistan

¹GAO, *Securing, Stabilizing, and Reconstructing Afghanistan: Key Issues for Congressional Oversight*, [GAO-07-801SP](#) (Washington, D.C.: May 24, 2007); *Afghanistan: Key Issues for Congressional Oversight*, [GAO-09-473SP](#) (Washington, D.C.: Apr. 21, 2009); and *Afghanistan: Key Oversight Issues*, [GAO-13-218SP](#) (Washington, D.C.: Feb. 11, 2013).

²Pub. L. No.95-452, 92 Stat. 1101 (Oct. 12, 1978), *codified as amended at* 5 U.S.C. App.

reconstruction efforts.³ To further increase coordination of oversight activities regarding U.S. efforts for overseas contingency operations, Congress also established a Lead Inspector General (Lead IG) to be designated from among the OIGs at DOD, State, and USAID for each new overseas contingency operation.⁴ For Operation Freedom's Sentinel, the current overseas contingency operation in Afghanistan, DOD OIG has been designated as the Lead IG. Together, SIGAR and the OIGs for DOD, State, and USAID are the primary sources of OIG oversight for U.S. operations in Afghanistan.

In its report accompanying the bill that would later be enacted as the National Defense Authorization Act (NDAA) for Fiscal Year 2017, the Senate Armed Services Committee included a provision for GAO to review the authorities and activities of the OIGs at State, DOD, and USAID and SIGAR regarding their oversight of U.S. operations in Afghanistan since January 1, 2015.⁵ This report addresses (1) the scope of the enabling legislation for SIGAR and the OIGs at State, DOD, and USAID with respect to oversight of U.S. operations in Afghanistan and the extent to which overlap, if any, exists among the mandates of each OIG; (2) the oversight activities and primary areas of focus for the OIGs at State, DOD, and USAID and for SIGAR regarding U.S. operations in Afghanistan for the period from January 1, 2015, through September 30, 2016; and (3) the extent to which SIGAR and the OIGs at State, DOD, and USAID have coordinated their oversight of U.S. operations in Afghanistan to help prevent duplication during the period January 1, 2015, through September 30, 2016.

³National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, § 1229, 122 Stat. 3, 378 (Jan. 28, 2008). While the majority of federal statutory OIGs draw their authority from the IG Act, there are some other statutory OIGs that are governed by separate statutes. These other statutory OIGs generally follow many of the same standards, guidelines, and directives as do the IG Act OIGs, but sometimes there are significant differences in the scope of their powers and authorities.

⁴National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 848, 126 Stat. 1632, 1851 (Jan. 2, 2013) (adding a new section 8L to the IG Act). A contingency operation is a military operation that either has been designated by the Secretary of Defense as one in which members of the armed forces are or may become involved in military actions, operations, or hostilities against an enemy of the United States or against an opposing military force, or as one that results in the call or order to, or retention on, active duty of members of the armed forces under certain legal authorities. 10 U.S.C. § 101(a)(13).

⁵S. Rep. No. 114-255, at 309-310 (May 18, 2016).

To determine the scope of the enabling legislation for SIGAR and the OIGs at DOD, State, and USAID with respect to oversight of U.S. operations in Afghanistan, we researched applicable statutes, including the IG Act and the NDAA for Fiscal Year 2008, which authorize these OIGs, as well as other information we obtained through inquiries of the OIGs. We summarized and compared the applicable statutes to identify any overlap in the oversight authorities.

To determine the oversight activities and primary areas of focus regarding U.S. operations in Afghanistan for the period January 1, 2015, through September 30, 2016, we (1) reviewed SIGAR's and the three OIGs' strategic and annual audit plans; (2) reviewed quarterly reports issued by SIGAR and by the Lead IG (DOD IG) on Afghanistan reconstruction and Operation Freedom's Sentinel; (3) obtained all audit, inspection, and evaluation reports issued by SIGAR and the OIGs at DOD, State, and USAID during the period and compared the reports to the strategic plans to identify the primary areas of focus; and (4) interviewed officials at SIGAR and the OIGs at DOD, State, and USAID to confirm our understanding of the oversight activities and primary areas of focus.

To determine the extent to which SIGAR and the OIGs at DOD, State, and USAID coordinated their oversight of U.S. operations in Afghanistan to help avoid duplication of efforts during the period January 1, 2015, through September 30, 2016, we interviewed the OIGs to gain an understanding of the coordination process and reviewed related documentation.⁶ We also analyzed the objectives of the 137 audit, inspection, and evaluation reports issued by SIGAR and the OIGs at DOD, State, and USAID from January 1, 2015, through September 30, 2016, to identify any duplication in oversight activities.⁷ In addition, we compared the objectives of 43 special projects issued by SIGAR from January 1, 2015, through September 30, 2016, to the objectives of the 137 oversight products issued by the four OIGs to identify any duplication

⁶We previously reported that duplication is defined as occurring when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries. See GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*, [GAO-15-49SP](#) (Washington, D.C.: Apr. 14, 2015).

⁷Included in our review of the 137 reports were 44 financial audits resulting from USAID contracts with various independent public accounting firms to perform audits of contract and grant awards within Afghanistan. For these audits, which have similar objectives, our review consisted of checking the contractor name, contract number, subject matter of the audit, as well as the time period covered by the audit to determine if there was duplication with the objectives of SIGAR, DOD OIG, or State OIG reports.

in oversight activities. Further, we reviewed the requests for information to agencies, referred hereafter as data calls, developed separately by SIGAR and the Lead IG for the quarterly reports covering the fourth quarter of fiscal year 2016. For these data calls, we compared the questions sent to the agencies and performed key word searches to identify duplication in the information requested.

We conducted this performance audit from July 2016 to November 2017 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 I provides additional details on our scope and methodology.

Background

Since 2001, the United States has made a commitment to ensure that Afghanistan is a secure country, is free from terrorism, and has a democratic government respectful of human rights. To this end, the United States has contributed financial aid and implemented programs designed to build military and governance capacity, as well as to promote economic development, and humanitarian assistance efforts. Operation Enduring Freedom was the U.S.-led combat operation aimed at conducting counterterrorism operations in Afghanistan and elsewhere. Operation Enduring Freedom ended on December 31, 2014, and was succeeded by Operation Freedom's Sentinel on January 1, 2015, which supports two complementary missions: Resolute Support and Counterterrorism.

The North Atlantic Treaty Organization (NATO)-led Resolute Support mission involves U.S. forces helping to provide support to train, advise, and assist the Afghan National Defense and Security Forces. The objective of this mission is to build a professional, independent force that can maintain security in Afghanistan and prevent the country from becoming a terrorist sanctuary. The Counterterrorism mission's objective is to prevent the resurgence of al Qaeda and its remnants and to defeat the Islamic State affiliate operating in Afghanistan.

In mid-2011, at the height of combat operations, 100,000 U.S. troops were deployed to Afghanistan in support of Operation Enduring Freedom. Since then, the United States has drawn down its military personnel in Afghanistan. According to the Lead Inspector General's (Lead IG) report

for the quarter ending March 31, 2017, there were 8,448 troops still in Afghanistan in support of Operation Freedom's Sentinel as of January 2017.⁸ Although Operation Enduring Freedom ended on December 31, 2014, and troop levels have declined, federal agencies—including DOD, State, and USAID—have continued to allocate billions of dollars to support Afghanistan's security in areas such as the development of Afghan National Defense and Security Forces; counternarcotics; efforts to improve governance; development efforts for the construction of roads, schools, and other infrastructure projects; and diplomatic and humanitarian assistance to the Afghan people.⁹

The IG Act, as amended, authorizes OIGs within DOD, State, and USAID to provide independent and objective oversight over the programs and operations within their respective federal agency.¹⁰ In addition to these agencies' OIGs, Congress established SIGAR in the NDAA for Fiscal Year 2008 to provide independent and objective oversight of programs and operations funded with amounts appropriated for Afghanistan reconstruction. As such, SIGAR was given cross-agency oversight jurisdiction of all reconstruction efforts in Afghanistan, including oversight of certain contracts in Afghanistan.

Congress also created a Lead IG role in the NDAA for Fiscal Year 2013, to improve planning and coordination of oversight activities for overseas contingency operations. As amended by the NDAA for Fiscal Year 2013, Section 8L of the IG Act requires the Chair of the Council of Inspectors General for Integrity and Efficiency (CIGIE) to designate a Lead IG from among the OIGs at DOD, State, and USAID for each overseas contingency operation lasting more than 60 days. Since the creation of the Lead IG in the NDAA for Fiscal Year 2013, the Chair of CIGIE has

⁸Lead Inspector General for Overseas Contingency Operations, *Operation Freedom's Sentinel Report to the United States Congress January 1, 2017-March 31, 2017*.

⁹In February 2017, the Congressional Research Service reported that DOD obligated approximately \$650 billion in Afghanistan for Operation Enduring Freedom and Operation Freedom's Sentinel during fiscal year 2001 through fiscal year 2016. In addition, in October 2016, SIGAR reported that costs associated with reconstruction in Afghanistan during fiscal year 2002 through fiscal year 2016 were approximately \$100 billion. While data are available for funding for U.S. reconstruction in Afghanistan, specific figures for funding for U.S. military operations in Afghanistan do not exist because funding provided to DOD for military operations is generally appropriated by operation, not country.

¹⁰As originally enacted in 1978, the IG Act applied to only 12 federal agencies. Other inspectors general (IG) were added over time. The Department of State IG was created in 1980, the USAID IG was created in 1981, and the DOD IG was created in 1982.

designated DOD OIG as Lead IG for three different overseas contingency operations: Operation Inherent Resolve (the counter ISIS effort centered on Iraq and Syria), Operation United Assistance (the Ebola response in Africa), and Operation Freedom's Sentinel in Afghanistan. Of the three overseas contingency operations that triggered the Lead IG requirement, only Operation Freedom's Sentinel involves a geographic area, subject area, or both in which a statutory Special Inspector General, in this case SIGAR, also has oversight responsibility. Since 2008, SIGAR has provided continuous oversight of Afghanistan reconstruction, including when Operation Enduring Freedom was terminated in December 2014 and when Operation Freedom's Sentinel commenced in Afghanistan.

On January 1, 2015, Operation Freedom's Sentinel was declared a new overseas contingency operation. On April 1, 2015, the Chair of CIGIE designated the DOD IG to be the Lead IG for that operation, which gave DOD OIG a leading role in planning, coordinating, and reporting on oversight activities for all aspects of Operation Freedom's Sentinel. Even though the Lead IG is given a lead role in the oversight activities related to Operation Freedom's Sentinel, the audits, inspections, evaluations, and investigations in Afghanistan are performed by the OIGs at DOD, State, and USAID within each of their agency's jurisdictional boundaries and SIGAR with its cross-agency jurisdiction.¹¹ According to USAID OIG officials, USAID does not have any programs or operations related to Operation Freedom's Sentinel. USAID's programs and operations in Afghanistan are diplomatic, development, and humanitarian assistance activities that relate to Afghanistan reconstruction. In addition to these four OIGs, other oversight bodies such as the U.S. Army Audit Agency, the Naval Audit Service, the Air Force Audit Agency, and GAO may also perform oversight activities related to U.S. operations in Afghanistan.

SIGAR and the OIGs at DOD, State, and USAID all maintain staff who coordinate and conduct oversight activities and travel throughout Afghanistan and other locations in the region to conduct audit fieldwork in their respective areas. Staff from these offices meet regularly with their counterparts and work in proximity, which agency officials stated helps to enhance communication and coordination between the OIGs charged with oversight of U.S.-funded programs. As of September 30, 2016, the four OIGs had 283 full-time equivalent (FTE) personnel in total who

¹¹In addition to its oversight activities, SIGAR has an Office of Special Projects, which examines emerging issues and produces inquiry letters, fact sheets, and other information for federal agencies and Congress on various facets of Afghanistan reconstruction.

provided oversight of U.S. operations in Afghanistan, as shown in table 1. DOD OIG had 48 FTEs, with the majority located in the Washington, D.C., area and 13 auditor, investigator, evaluator, and mission support FTEs located in offices in Kabul and Bagram Air Field, Afghanistan, and Al Udeid, Qatar. Personnel are assigned to these locations on at least a 6-month rotation. State OIG maintains field offices in Kabul, the capital of Afghanistan; Frankfurt, Germany; and Washington, D.C. State OIG had 20 auditor, investigator, analyst, and mission support FTEs. USAID OIG had 7 auditor, 4 investigator, and 2 administrative FTEs based in Kabul and 1 analyst located in the Washington, D.C., area. With 201 total FTEs, SIGAR had the largest Afghanistan oversight presence among the four OIGs, as well as the largest number of auditors located in Kabul. SIGAR's 201 FTEs included auditors, investigators, analysts, and mission support staff located throughout the United States and other locations who provide oversight of Afghanistan operations.

Table 1: FTEs for Offices of Inspector General Providing Oversight Activities in Afghanistan, by Position and Location, as of September 30, 2016

Position and location	Office of Inspector General FTEs			
	SIGAR ^a	DOD ^b	State ^b	USAID ^a
Afghanistan				
Auditor	19.00	5.50	3.00	7.00
Investigator	17.00	2.25	2.00	4.00
Evaluator/analyst	0.00	2.50	0.00	0.00
Mission support ^c	3.00	1.00	0.00	2.00
United States				
Auditor	44.00	7.00	8.00	0.00
Investigator	24.00	3.50	1.20	0.00
Evaluator/analyst	25.00	21.50	1.50	1.00
Mission support ^c	54.00	3.50	0.00	0.00
Other locations				
Auditor	3.00	0.00	4.00	0.00
Investigator	6.00	0.00	0.30	0.00
Evaluator/analyst	2.00	0.00	0.00	0.00
Mission support ^c	4.00	1.25	0.00	0.00
Total	201.00	48.00	20.00	14.00

Legend:

DOD = Department of Defense

FTE = full-time equivalent

SIGAR = Special Inspector General for Afghanistan Reconstruction

State = Department of State

USAID = U.S. Agency for International Development

Source: GAO analysis of staffing information provided by SIGAR and the Offices of Inspector General at DOD, State, and USAID. | GAO-18-6

^aFTEs for SIGAR and USAID in Afghanistan include locally hired staff.

^bNumbers of FTEs for DOD and State with decimal points include personnel partially committed to Afghanistan oversight.

^cMission support may include human resources, administrative, legal, and information technology personnel.

Scope of Enabling Legislation Results in Overlap in the Statutory Mandates for OIG Oversight of U.S. Operations in Afghanistan

Laws providing for OIG oversight of U.S. operations in Afghanistan have changed over time, establishing new entities and roles resulting in overlap in oversight areas, duties and responsibilities, and authorities of the relevant OIGs. For example, SIGAR's cross-agency oversight jurisdiction overlaps with the agency-specific authority of the OIGs, such as those at DOD, State, and USAID, whose respective agencies have programs in Afghanistan. Further, overlap also exists with respect to requirements for SIGAR and the OIGs to report on these and other oversight activities. We have previously reported that overlap is defined as occurring when multiple agencies have similar goals, engage in similar activities or strategies to achieve them, or target similar beneficiaries. However, we have also recognized that there could be instances where some degree of program overlap or duplication may be warranted because of the nature or magnitude of the federal effort.¹²

Scope of Enabling Legislation for Inspector General Oversight of U.S. Operations in Afghanistan

Scope of Enabling Legislation Related to Oversight Areas, Duties and Responsibilities, and Select Authorities

The statutory OIGs providing oversight of U.S. operations in Afghanistan draw their authority from a series of laws passed by Congress. Specifically, the IG Act authorizes OIGs within certain federal agencies to provide independent and objective oversight of the programs and operations within their respective federal agencies, including those operations taking place in Afghanistan. In addition, the NDAA for Fiscal Year 2008 created SIGAR, and the NDAA for Fiscal Year 2013 amended the IG Act to designate a Lead IG for certain overseas contingency operations. The scope of the enabling legislation for the OIGs, SIGAR,

¹²[GAO-15-49SP](#).

and the Lead IG in providing oversight of U.S. operations in Afghanistan is summarized in table 2.

Table 2: Summary of Oversight Areas, Major Duties and Responsibilities, and Select Authorities for Offices of Inspector General Related to U.S. Operations in Afghanistan

Enabling legislation	Office(s) of Inspector General	Oversight areas, duties and responsibilities, and select authorities
Oversight areas		
IG Act of 1978, as amended	DOD, State, and USAID	Programs and operations of their respective agency, all of which have programs related to Afghanistan.
NDAA for Fiscal Year 2008	SIGAR	Programs and operations related to funds for Afghanistan reconstruction efforts.
NDAA for Fiscal Year 2013 (amending the IG Act of 1978)	Lead IG for Operation Freedom's Sentinel (DOD IG) ^a	Programs and operations in support of Operation Freedom's Sentinel which includes counterterrorism and developing, training and equipping the Afghan military and police forces to provide security for the Afghan population.
Major duties and responsibilities and select authorities		
IG Act	DOD, State, and USAID	<ul style="list-style-type: none"> Conduct, supervise, and coordinate audits and investigations of their respective agencies' programs and operations. Provide policy direction, review legislation and regulations, and make recommendations to promote economy and efficiency, and prevent and detect fraud and abuse in their respective agencies' programs and operations. Access records and other materials as applicable to their respective agencies' programs and operations. Request information or assistance from federal, state, or local government entities, as necessary.
NDAA for Fiscal Year 2008	SIGAR	<ul style="list-style-type: none"> Conduct, supervise, and coordinate on audits and investigations of funds related to the reconstruction of Afghanistan and receive cooperation from the OIGs for DOD, State, and USAID. Provide policy direction, review legislation and regulations, and make recommendations to promote economy and efficiency, and prevent and detect fraud and abuse. Access records and other materials as applicable to federal Afghanistan reconstruction programs and activities. Request information or assistance from federal, state, or local government entities, as necessary.

Enabling legislation	Office(s) of Inspector General	Oversight areas, duties and responsibilities, and select authorities
NDAA for Fiscal Year 2013 (amending the IG Act)	Lead IG for Operation Freedom's Sentinel (DOD IG) ^a	<ul style="list-style-type: none"> Develop and carry out, in coordination with the OIGs for State and USAID, a joint strategic plan to conduct comprehensive oversight through separate or joint audits, inspections, or investigations. Review and ascertain the accuracy of information provided by federal agencies relating to obligations and expenditures, costs, accountability of funds, and the award and execution of major contracts and grants and agreements. Discharge oversight duties or determine principal jurisdiction among the OIGs for DOD, State, and USAID over Operation Freedom's Sentinel matters.

Legend:

DOD = Department of Defense

IG Act = Inspector General Act of 1978, as amended

Lead IG = Lead Inspector General

NDAA = National Defense Authorization Act

OIG = Office of Inspector General

SIGAR = Special Inspector General for Afghanistan Reconstruction

State = Department of State

USAID = U.S. Agency for International Development

Source: GAO analysis of the NDAA for Fiscal Year 2008, Section 1229 and IG Act, Sections 2, 4, 6, and 8L. | GAO-18-6

^aAs the Lead IG for Operation Freedom's Sentinel, DOD OIG has separate responsibilities in addition to its oversight responsibilities for DOD programs and operations under the IG Act.

The following provides additional details on the scope of the OIGs' oversight areas, duties and responsibilities, and select authorities as described in the applicable enabling legislation.

The IG Act and Agency Inspectors General

The IG Act authorizes the OIGs in many federal entities, including DOD, State, and USAID, for the purpose of creating independent and objective units to

- conduct and supervise audits and investigations relating to programs and operations of their respective federal agency;
- provide leadership and coordination and recommend policies for activities designed to promote economy, efficiency, and effectiveness in the administration of, and to prevent and detect fraud and abuse in, such programs and operations; and
- provide a means for keeping the head of each agency and Congress fully and currently informed about problems and deficiencies relating to the administration of such programs and operations.

Under the IG Act, each OIG also has duties and responsibilities relating to its respective agency that include

- providing policy direction for, and conducting audits and investigations relating to, the programs and operations within its respective federal agency or entity;
- performing reviews of existing and proposed legislation and regulations as well as making recommendations concerning the impact of such legislation or regulations; and
- recommending policies for the purpose of promoting economy, efficiency, and effectiveness and preventing and detecting fraud and abuse in programs and operations.

To help ensure that OIGs accomplish their oversight objectives, the IG Act gives them the authority to access records and other materials applicable to their respective agencies' programs and operations. OIGs are also authorized to investigate and report on the administration and operations of their respective agencies and request information or assistance from federal, state, or local government entities as necessary to perform their work.

DOD, State, and USAID also have programs and operations that support military, diplomatic, and reconstruction activities in Afghanistan that are funded by the federal government. As a result, the OIGs at DOD, State, and USAID all have oversight duties and responsibilities associated with their respective agencies' programs and operations in Afghanistan.

The NDAA for Fiscal Year 2008 and the Special Inspector General for Afghanistan Reconstruction

The NDAA for Fiscal Year 2008 established SIGAR to provide independent and objective audits, investigations, policy recommendations, and information related to programs and operations funded with amounts appropriated or otherwise made available for the reconstruction of Afghanistan. In providing oversight of Afghanistan reconstruction, SIGAR has all the duties of OIGs under the IG Act, such as those mentioned above, plus specific duties to conduct, supervise, and coordinate audits and investigations of the treatment, handling, and expenditure of amounts appropriated or otherwise made available for the reconstruction of Afghanistan and the programs, operations, and contracts carried out using such funds. Those audits and investigations are to include, among other things, oversight and accounting of the obligation and expenditure of Afghanistan reconstruction funds and monitoring and reviewing reconstruction activities and related contracts carried out utilizing such funds.

The NDAA for Fiscal Year 2008 also requires SIGAR to audit waste, fraud, and abuse in wartime contracts and contracting processes in Afghanistan in coordination with the OIGs at DOD, State, and USAID.¹³ Specifically, SIGAR and these OIGs are charged with identifying potential waste, fraud, and abuse in the performance of (1) DOD contracts, subcontracts, and task and delivery orders for logistical support of coalition forces and (2) federal agency contracts, subcontracts, and task and delivery orders for security and reconstruction efforts in Afghanistan.

SIGAR's oversight jurisdiction extends to all Afghanistan reconstruction efforts and is not limited to one agency's programs and operations. As such, SIGAR has the authority to perform audits and investigations across various agencies' (i.e., DOD, State, USAID, and others) programs, operations, and contracts funded with amounts available for reconstruction in Afghanistan. In carrying out its oversight duties, the NDAA for Fiscal Year 2008 provides SIGAR the same authorities that agency OIGs have under the IG Act to access records and other materials of federal agencies' programs and operations. SIGAR is also required to coordinate with and receive cooperation from the OIGs at DOD, State, and USAID.

The NDAA for Fiscal Year 2013 and the Lead Inspector General

The NDAA for Fiscal Year 2013 amended Section 8L of the IG Act to create the Lead IG role for coordinating, developing a joint strategic oversight plan, and reporting on oversight activities for an overseas contingency operation. Under Section 8L, the Chair of CIGIE is required to designate a Lead IG from among the OIGs for State, DOD, and USAID to coordinate oversight efforts for any overseas contingency operation lasting more than 60 days. In coordination with the other two agency OIGs named above, this Lead IG is then responsible for, among other things, developing and carrying out a joint strategic plan to conduct comprehensive oversight of all aspects of the contingency operation.

In Afghanistan, Operation Freedom's Sentinel began as a contingency operation on January 1, 2015, with DOD OIG designated by CIGIE as the Lead IG on April 1, 2015. The Operation Freedom's Sentinel mission involves two primary areas of focus: (1) a counterterrorism mission against the remnants of al Qaeda, the Islamic State-Khorasan, and other terrorist groups in the region and (2) working with NATO allies to train, advise, and assist the Afghan National Defense and Security Forces. The

¹³NDAA for Fiscal Year 2008, § 842.

train, advise, and assist mission constitutes the U.S. contribution to NATO's Resolute Support mission to train, advise, and assist the Afghan National Defense and Security Forces to further the development and operation of Afghanistan's security sector.

While SIGAR conducts oversight of reconstruction programs and operations implemented and funded by various federal agencies, including DOD, State, and USAID, the Lead IG role does not include such authority. Section 8L of the IG Act does not create a new OIG; it gives jurisdiction to the Lead IG to conduct oversight in cases where the three named OIGs do not have principal jurisdiction over a matter with respect to the contingency operation. The Lead IG has the responsibility for discharging oversight responsibilities in accordance with the IG Act in these cases.¹⁴ Otherwise, OIGs oversee their respective agencies' programs and operations. Section 8L also specifies how the three agency OIGs are to coordinate in providing oversight of a declared contingency operation and provides the designated Lead IG with additional responsibilities, including reviewing and ascertaining the accuracy of information related to funding and contracts that support the contingency operation. Where more than one OIG has jurisdiction, the Lead IG has the responsibility to determine which OIG will be responsible for discharging oversight responsibilities.

Scope of Enabling Legislation
Related to Reporting
Requirements

In addition to providing the OIGs' mandates related to oversight areas, duties and responsibilities, and select authorities, the scope of the enabling legislation also includes reporting requirements. Table 3 summarizes the scope of the enabling legislation for the OIGs, SIGAR, and the Lead IG related to reporting requirements for U.S. operations in Afghanistan.

Table 3: Summary of Reporting Requirements for Offices of Inspector General Related to U.S. Operations in Afghanistan		
Enabling legislation	Office(s) of Inspector General	Scope of reporting requirements
IG Act	DOD, State, and USAID	<ul style="list-style-type: none">Semiannual reports summarizing all oversight activities for their agencies are to be issued to Congress and their respective agency heads.Reports are to be issued for the 6 months ending on March 31 and September 30.

¹⁴DOD OIG officials stated that rather than conducting this oversight within DOD OIG, they refer such matters to other OIGs with jurisdiction, other than those named in Section 8L, as appropriate.

Enabling legislation	Office(s) of Inspector General	Scope of reporting requirements
NDA for Fiscal Year 2008	SIGAR	<ul style="list-style-type: none"> Quarterly reports summarizing oversight activities of SIGAR and activities under programs and operations funded for the reconstruction of Afghanistan are to be issued to Congress, the Secretary of State, and the Secretary of Defense. Reports are to be issued for quarters ending on December 31, March 31, June 30, and September 30.
NDA for Fiscal Year 2013 (amending the IG Act)	Lead IG for Operation Freedom's Sentinel (DOD OIG) ^a	<ul style="list-style-type: none"> Quarterly reports on all aspects of Operation Freedom's Sentinel are to be issued to Congress. Reports are to be issued for quarters ending on December 31, March 31, June 30, and September 30. Biannual reports are to be issued to Congress on oversight activities of the Lead IG and the OIGs at State and USAID, including the status and results of audits, investigations, and inspections and overall plans for the overseas contingency operation. Reports are to be issued biannually for the 6 months ending March 31 and September 30.^b

Legend:

DOD = Department of Defense

IG Act = Inspector General Act of 1978, as amended

Lead IG = Lead Inspector General

NDA = National Defense Authorization Act

OIG = Office of Inspector General

SIGAR = Special Inspector General for Afghanistan Reconstruction

State = Department of State

USAID = U.S. Agency for International Development

Source: GAO analysis of NDA for Fiscal Year 2008, Section 1229, and IG Act, Sections 5 and 8L. | GAO-18-6

^aDOD IG, as the Lead IG for Operation Freedom's Sentinel, has reporting requirements separate from its semiannual reporting requirements under the IG Act.

^bAccording to DOD OIG officials, they are meeting the bi-annual Lead IG reporting requirement on oversight activities by including this information in the Operation Freedom's Sentinel quarterly reports.

The following includes additional details on reporting requirements for the OIGs' semiannual reports, SIGAR's quarterly reports, and the Lead IG's quarterly and biannual reports.

OIGs: Under the IG Act, the DOD, State, and USAID OIGs must prepare semiannual reports summarizing their oversight activities, including, among other things,

- significant problems, abuses, and deficiencies relating to the administration of programs and operations;
- recommendations for corrective actions made with respect to significant problems, abuses, or deficiencies identified;

-
- identification of each significant recommendation in previous reports for which corrective action has not been completed;
 - summary of matters referred to prosecutive authorities and the prosecutions and convictions that resulted;¹⁵
 - listing (by subject matter) of each audit, inspection, and evaluation report issued during the period and where applicable the dollar value of questioned costs and recommendations;
 - summary of significant reports; and
 - statistical table showing the total number of audit, inspection, and evaluation reports and total dollar value of questioned costs.

SIGAR: SIGAR is required to issue quarterly reports that include a detailed statement of all reconstruction activities in Afghanistan, including

- obligations and expenditures of appropriated funds for the reconstruction of Afghanistan;
- a project-by-project and program-by-program accounting of the costs incurred to date and estimates of DOD's, State's, and USAID's costs to complete each project and program related to the reconstruction of Afghanistan;
- revenues attributable to or consisting of funds provided by foreign nations or international organizations, or of foreign assets seized or frozen that contribute to programs and projects funded by any department or agency of the federal government, and any obligations or expenditures of such revenues, related to the reconstruction of Afghanistan;
- operating expenses of agencies or entities receiving amounts appropriated for the reconstruction of Afghanistan; and
- specific information about covered contracts, grants, agreements, and other funding mechanisms that are entered into by any department or agency of the federal government that involve the use of amounts appropriated or otherwise made available for the reconstruction of Afghanistan.

Lead IG: As the Lead IG for Operation Freedom's Sentinel, DOD OIG is required to issue quarterly reports on Operation Freedom's Sentinel. Section 8L of the IG Act does not specify the information required to be

¹⁵Prosecutive authorities may include a U.S. Attorney, prosecuting attorney of a state, or staff Judge Advocate.

included in quarterly reports. However, the Lead IG is also required to provide biannual reports on oversight activities it and the OIGs at State and USAID conduct with respect to the overseas contingency operation, including

- status and results of investigations, inspections, and audits and of referrals to the Department of Justice and
- overall plans for the review of the overseas contingency operation by OIGs, including plans for investigations, inspections, and audits.

Overlap Exists in the Mandates for the OIGs with Responsibility for Oversight of U.S. Operations in Afghanistan

Overlap in Oversight Areas, Duties and Responsibilities, and Select Authorities

Because the IG Act requires the OIGs at DOD, State, and USAID to conduct oversight activities of their respective agency's programs and operations, there is no inherent overlap among these OIGs when conducting oversight with respect to their agencies' operations in Afghanistan.¹⁶ However, we identified areas of overlap among the mandates for SIGAR and the OIGs at DOD, State, and USAID concerning their oversight of U.S. operations in Afghanistan. Specifically, SIGAR is required to provide oversight across all agencies, namely DOD, State, and USAID, regarding their roles in Afghanistan reconstruction efforts. The OIGs at DOD, State, and USAID are required to provide oversight of their agencies' programs and operations generally, including those related to Afghanistan reconstruction. This overlap in the oversight areas among SIGAR and the OIGs at DOD, State, and USAID results in overlapping duties and responsibilities when they perform their oversight activities, such as conducting audits and investigations as required by their mandates.

¹⁶Our work focused on the oversight activities by the OIGs. We did not review each respective agency for overlap related to Afghanistan programs and operations. In cases where their respective agencies are collaborating or working with the same partner organizations, there is a potential for overlap in the OIGs' activities.

Overlap in Reporting Requirements

Additionally, the NDAA for Fiscal Year 2013 requires the designated Lead IG for Operation Freedom's Sentinel (which is the DOD IG) to review and ascertain the accuracy of information provided by federal agencies in support of the contingency operation. This results in a potential for overlap with SIGAR and the OIGs at State and USAID as they perform their duties and responsibilities under their general oversight authorities.¹⁷

Overlap also exists among the mandates for SIGAR and the OIGs at DOD, State, and USAID concerning requirements for reporting on U.S. operations in Afghanistan and the OIGs' oversight of such. Typically, an OIG reports only on the oversight conducted by its own office. However, as discussed above, SIGAR was established with oversight areas that overlap with those of other OIGs. Overlap in reporting requirements also exists both between SIGAR and the Lead IG for Operation Freedom's Sentinel and between the Lead IG and the agency OIGs at State and USAID. Specifically, both SIGAR and the Lead IG are subject to statutory requirements to report quarterly on the overall conduct of the federal programs and operations within the scope of their oversight. This includes, for example, projects funded by the Afghanistan Security Forces Fund because this fund is used for reconstruction activities and also supports the train, advise, and assist element of Operation Freedom's Sentinel support of NATO's Resolute Support mission.

In addition, DOD IG, in its role as the Lead IG, is explicitly required to biannually report on the activities of the State and USAID OIGs related to Operation Freedom's Sentinel, while these OIGs are still subject to the general requirements of the IG Act to report semiannually on their own operations.¹⁸ This overlap in reporting requirements potentially results in the OIGs providing the same information in each of their reports to Congress and others.

¹⁷The Lead IG for Operation Freedom's Sentinel is also assigned principal oversight jurisdiction over any element of the contingency operation for which none of the OIGs—at DOD, State, and USAID—have such jurisdiction. This authority could potentially overlap with that of SIGAR, to the extent that an element of Operation Freedom's Sentinel falls outside the jurisdiction of the DOD, State, and USAID OIGs but is within SIGAR's Afghanistan reconstruction oversight mission.

¹⁸According to DOD IG officials, they are meeting their Lead IG biannual requirement to report on oversight by combining this report with their quarterly reporting on Operation Freedom's Sentinel.

Oversight Activities and Primary Areas of Focus for the Inspectors General with Oversight Responsibilities in Afghanistan

SIGAR and the OIGs at DOD, State, and USAID conduct audits; inspections; evaluations; investigations; and other activities, such as special projects and outreach activities, to meet their Afghanistan oversight requirements. All audits begin with objectives that determine the type of audit to be performed and are to be completed in accordance with generally accepted government auditing standards (GAGAS) issued by the Comptroller General.¹⁹ Criminal and administrative investigations, inspections, and evaluations are to be completed in accordance with standards issued by CIGIE.²⁰ In addition, oversight activities conducted by SIGAR and the OIGs at DOD, State, and USAID focus on specific strategic oversight areas identified in connection with their annual planning processes, including contract oversight and management and building capacity of Afghanistan forces.

Types of Oversight Activities

Audits, Inspections, and Evaluations

SIGAR and the OIGs at DOD, State, and USAID are required, among other things, to conduct and supervise audits, providing a means of keeping Congress fully and currently informed about problems and deficiencies, including those related to U.S. operations in Afghanistan.²¹ Audits provide an independent, objective, nonpartisan assessment of the stewardship, performance, or cost of government policies, programs, or operations, depending on the type and scope of the audit.

SIGAR and the OIGs at DOD, State, and USAID perform two types of audits, performance and financial audits.

- Performance audits are audits that provide findings or conclusions based on evaluation of sufficient, appropriate evidence against criteria. Performance audit objectives vary widely and include

¹⁹IG Act, § 4(b)(1). See also GAO, *Government Auditing Standards: 2011 Revision*, [GAO-12-331G](#) (Washington, D.C.: December 2011).

²⁰OIGs are required to adhere to professional standards established by CIGIE. IG Act § 11(c)(2). These include CIGIE's *Quality Standards for Federal Offices of Inspector General*, *Quality Standards for Investigations*, and *Quality Standards for Inspection and Evaluation*.

²¹IG Act, § 4(a); NDAA for Fiscal Year 2008, § 1229(f)(3).

assessments of program effectiveness, economy, and efficiency; internal control; compliance; and prospective analyses.²² Performance audits are to be conducted in accordance with GAGAS.

- Financial audits provide an independent assessment of whether an entity's reported financial information (e.g., financial condition, results, and use of resources) is presented fairly in accordance with recognized criteria. Financial audits performed in accordance with GAGAS include financial statement audits and other related financial audits.²³

Inspections and evaluations are additional types of oversight activities performed by SIGAR and the OIGs at DOD, State, and USAID. The inspection and evaluation function at each OIG is tailored to the respective agency's unique mission. A fundamental difference between the standards for audits and those for inspections and evaluations is the level of detail and requirements for sufficient, appropriate evidence to support findings and conclusions. Audits performed under GAGAS, by design, require more depth in their levels of evidence and documentation supporting the findings than inspections and evaluations performed under CIGIE standards.

As shown in table 4, from January 1, 2015, through September 30, 2016, SIGAR and the OIGs at DOD, State, and USAID issued a total of 137 audit, inspection, and evaluation reports related to oversight of U.S. operations in Afghanistan. SIGAR conducted 57 audits, most of which were financial audits that assessed the award and administration of contracts related to Afghanistan reconstruction efforts.²⁴ USAID OIG also

²²[GAO-12-331G](#), paras. 2.10 and 2.11.

²³The primary purpose of a financial statement audit is to provide an opinion about whether an entity's financial statements are presented fairly, in all material respects, in conformity with an applicable financial reporting framework. Other types of financial audits conducted in accordance with GAGAS entail various scopes of work, including (1) obtaining sufficient, appropriate evidence to form an opinion on single financial statements or specified elements, accounts, or items of a financial statement; (2) issuing letters for underwriters and certain other requesting parties; and (3) auditing compliance with applicable compliance requirements relating to one or more government programs. See [GAO-12-331G](#), paras. 2.07, 2.07a, and 2.07b.

²⁴SIGAR contracted with various independent public accounting firms to perform financial audits of contract and grant awards within Afghanistan. The purpose of these audits was to express an opinion on the fair presentation of aspects of the financial statements. For example, the opinion on the financial statements included evaluating the presentation, content, and underlying records supporting the statement(s).

issued 44 financial and 3 performance audits focused on costs associated with building Afghanistan’s capacity and capabilities of agricultural, educational, and health care services.²⁵ DOD OIG primarily conducted performance audits assessing (1) equipment accountability; (2) the capabilities and policies of the Afghan National Defense and Security Forces which includes the Afghan National Army and the Afghan National Police; and (3) contract management and oversight activities. State OIG’s audits of contract management and oversight activities focused on contractor performance and training of personnel responsible for contract oversight.

Table 4: Type and Number of Reports Issued by OIGs Providing Oversight of U.S. Operations in Afghanistan, from January 1, 2015, through September 30, 2016

Type of report issued ^a	Office of Inspector General				Total
	SIGAR	DOD	State	USAID	
Performance audit	13	11	4	3	31
Financial audit	44	0	0	44	88
Subtotal	57	11	4	47	119
Inspection	13	1	1	0	15
Evaluation	0	2	1	0	3
Total	70	14	6	47	137

Legend:

DOD = Department of Defense

OIG = Office of Inspector General

SIGAR = Special Inspector General for Afghanistan Reconstruction

State = Department of State

USAID = U.S. Agency for International Development

Source: GAO analysis of the audit, inspection, and evaluation reports issued by the OIGs. | GAO-18-6

^aThe type of report issued is based on each OIG’s classification.

²⁵USAID contracted with various independent public accounting firms to perform financial audits of contractors or grantees in Afghanistan. The purpose of these “nonfederal” audits was to express an opinion on whether the statement or schedule audited presents fairly, in all materials respects, financial information for the period, as well as evaluating internal controls, testing compliance with laws and regulations, and determining the status of actions taken on prior recommendations. USAID OIG officials stated that they performed desk reviews of these audits to help ensure that the independent public accounting firms observed applicable standards and that the U.S. government’s interests were protected.

Investigations

In addition to performing audits, inspections, and evaluations, OIGs have authority to conduct independent investigations.²⁶ SIGAR and the OIGs at DOD, State, and USAID receive allegations of fraud, waste, or abuse and determine whether to initiate investigations. Investigations may identify criminal, civil, and administrative violations and cover all facets of an agency's operations or, in the case of SIGAR, all facets of Afghanistan reconstruction.²⁷ SIGAR's and DOD OIG's investigations are often joint efforts involving State OIG; USAID OIG; and other oversight entities, such as the U.S. Army Criminal Investigative Command, the Federal Bureau of Investigation, the Naval Criminal Investigative Service, and the Air Force Office of Special Investigation. Approximately 200 investigations were closed from January 1, 2015, through September 30, 2016, most of which involved allegations of bribery, fraud, corruption, or conflicts of interest related to Afghanistan reconstruction and Operation Freedom's Sentinel programs and operations.

Special Projects and Outreach Efforts

Other OIG oversight activities include special projects and outreach efforts.²⁸ SIGAR's Office of Special Projects examines emerging issues and produces inquiry letters, fact sheets, and other information for federal agencies and Congress on various facets of Afghanistan reconstruction. SIGAR issued 43 special project products from January 1, 2015, through September 30, 2016, that covered a range of issues. For example, according to its July 30, 2016, quarterly report, SIGAR (1) issued an alert letter related to potential structural damage at a USAID-funded educational facility; (2) issued inquiry letters to DOD, State, USAID, and the Department of Transportation regarding efforts to develop Afghanistan's railway sector; and (3) conducted a review of USAID-supported health facilities in Afghanistan.

²⁶IG Act. §§ 4(a)(1), 7(a).

²⁷According to OIG officials, each agency OIG maintains its own hotline to receive complaints specific to its agency. The agency's IG hotline representatives process the complaints they receive and refer these complaints to the appropriate entity in accordance with their respective protocols.

²⁸According to SIGAR's policies and procedures, special projects are to be completed in accordance with CIGIE's *Quality Standards for Federal Offices of Inspector General*. Because these standards relate to the overall operation of an OIG and do not provide standards for performing any particular type of oversight activity, SIGAR officials developed a *Special Projects Policies and Procedures Manual*, which they published in January 2016.

SIGAR and the OIGs at DOD, State, and USAID also participate in a number of outreach efforts with agency personnel as well as nonfederal personnel and others. According to reports published by SIGAR and the OIGs, these efforts typically involve providing fraud awareness briefings; providing literature and advice on fraud prevention strategies related to contracts and grants; meeting with Afghan government officials and others to provide information on the OIGs' respective roles; promoting awareness of their work through public forums, such as websites; and informing applicable congressional committees about important issues as needed.

Primary Areas of Focus for Oversight of U.S. Operations in Afghanistan

DOD OIG, in coordination with SIGAR and the OIGs at State and USAID, prepares the Comprehensive Oversight Plan for Overseas Contingency Operations (COP-OCO), an annual oversight plan for all overseas contingency operations, which includes audits of U.S. operations in Afghanistan.²⁹ This annual oversight plan describes the main areas for audits to be conducted during the fiscal year and classifies Afghanistan oversight activities into three main categories: reconstruction, crosscutting issues, and other efforts. These areas are further divided into seven strategic oversight areas.³⁰

Table 5 summarizes the number of audit, inspection, and evaluation reports issued by the OIGs from January 1, 2015, through September 30, 2016, classified by strategic oversight area as indicated in the applicable comprehensive oversight plan. Each OIG determines the classification of its oversight products within each of the main strategic oversight areas; some audits can be included in more than one strategic oversight area.

²⁹In addition to SIGAR and the OIGs at DOD, State, and USAID, other oversight entities collaborate or participate in the planning for oversight of U.S. operations in Afghanistan, including the U.S. Army Audit Agency, Naval Audit Service, Air Force Audit Agency, and GAO.

³⁰Not all of the OIGs perform audit work in the same strategic areas because their respective agencies may not have programs or operations applicable or relevant to the strategic area. Prior to issuing the fiscal year 2016 Comprehensive Oversight Plan for Overseas Contingency Operations (COP-OCO), the annual plan was referred to as the Comprehensive Oversight Plan for Southwest Asia (COPSWA). The COP-OCO and the COPSWA both result from the annual planning process. The fiscal year 2016 plan added "intelligence and counterterrorism" as a new strategic oversight area. However, there were no oversight products issued in this area from January 1, 2015, through September 30, 2016.

Table 5: Reports Issued by Offices of Inspector General Providing Oversight of U.S. Operations in Afghanistan, by Strategic Oversight Area, from January 1, 2015, through September 30, 2016

Strategic oversight area ^a	Office of Inspector General				Total
	SIGAR	DOD	State	USAID	
Reconstruction					
1. Building capacity and capabilities of the Afghan National Defense and Security Forces and administering and maintaining accountability of the Afghanistan Security Forces Fund. OIGs' work in this area may focus on whether the Afghan National Defense and Security Forces are making sufficient progress in building capacity and capabilities needed to become self-sufficient and maintain accountability for assistance they receive. This work may also focus on other accountability issues, including controls over the use of the Afghanistan Security Forces Fund.	5	6	0	0	11
2. Building Afghan governance capacity and sustaining U.S. investment in Afghan institutions and infrastructure. OIGs' work in this area may focus on assessing the extent to which the Afghan government has developed financial management capacity, generated revenues to fund its operations, and improved in areas of good governance and delivery of key services. This work may also focus on the extent to which projects aimed at improving education, health, and information, among others, have achieved objectives.	8	2	1	28	39
3. Implementing and executing anticorruption and counternarcotics programs. OIGs' work in this area may focus on determining whether the Afghan government has implemented anticorruption programs and deterred corruption by investigating, prosecuting, sanctioning, or removing corrupt officials, and implemented financial transparency and accountability measures. This work may also focus on determining the extent to which rule-of-law programs have improved Afghanistan's justice and correction systems, U.S. assistance to Afghanistan has helped achieve counternarcotics strategy goals and objectives, and the capability of the Afghan government to assume the lead role and sustain counternarcotics operation progress.	0	1	0	0	1
4. Awarding and administering reconstruction contracts. OIGs' work in this area may focus on whether contracts for Afghanistan's reconstruction are awarded competitively, whether contracts are administered to control costs and help ensure that contractors remain on schedule and perform as required, and how the U.S. government validates the performance of third-party monitors.	56	0	0	17	73
Areas other than reconstruction					
5. Retrograde and property management. OIGs' work in this area may focus on (1) whether DOD sufficiently planned and developed adequate controls to execute redeployment, retrograde, redistribution, return, and disposal of material and (2) DOD's ability to identify and quantify the remaining amount of materials for retrograde processing and the associated costs and future equipment requirements for U.S. forces. This work may also focus on determining whether controls are in place to mitigate loss of equipment during transporting and management of lost equipment, procedures to clear contractor requirements, and shipping of controlled equipment and munitions.	0	2	0	0	2

Strategic oversight area ^a	Office of Inspector General				Total
	SIGAR	DOD	State	USAID	
6. Contract management and oversight. OIGs' work in this area may focus on determining whether U.S. officials properly awarded, managed, and administered contracts. This work may also focus on oversight of contractor performance; management of contractors; and adequate protection of third-party nationals from unfair labor practices and abuses, including human trafficking.	0	5	5	2	12
Crosscutting areas					
7. Resolute Support mission and transition to security cooperation. OIGs' work in this area may focus on the Afghan government's progress for securing DOD military bases and convoys, the Afghan government's ability to sustain transferred infrastructure, and U.S. visibility over assets transferred to the Afghan government. This work may also focus on determining whether planned construction of the U.S. Embassy facilities in Kabul align with projected staffing levels and implementation of effective security and safety support for personnel at the embassy and the Defense Security Cooperation Management Office-Afghanistan.	1	1	0	0	2
Total	70	17^b	6	47	140^b

Legend:

DOD = Department of Defense

OIG = Office of Inspector General

SIGAR = Special Inspector General for Afghanistan Reconstruction

State = Department of State

USAID = U.S. Agency for International Development

Source: GAO analysis of the classification of reports as listed in the Comprehensive Oversight Plans for Overseas Contingency Operation for fiscal year 2017 and fiscal year 2016 and the Comprehensive Oversight Plans for Southwest Asia for fiscal year 2015 and fiscal year 2014, as well as the audit, inspection, and evaluation products issued by SIGAR and the OIGs at DOD, State, and USAID for the period from January 1, 2015, through September 30, 2016. | GAO-18-6

^aStrategic oversight areas are as identified in the fiscal year 2015 Comprehensive Oversight Plan for Southwest Asia.

^bOf the 137 reports we reviewed, three audits issued by DOD OIG were identified as addressing more than one strategic oversight area and, as a result, are listed more than once.

SIGAR Oversight Areas of Focus

SIGAR's primary areas of focus are reconstruction funds and wartime contracts. The funds appropriated by Congress provide support for various reconstruction efforts in Afghanistan, including the following:

- Afghanistan Security Forces Fund, which provides assistance to the Afghan security forces in the form of equipment, supplies, services, training, and facility maintenance (i.e., efforts to train, advise, assist, equip, base, and pay the Afghan security forces).
- Economic Support Fund, which supports the Afghan government in its efforts to (1) promote economic growth, (2) establish a democratic and capable state governed by the rule of law, and (3) provide basic services for its people.

-
- International Narcotics Control and Law Enforcement, which funds projects and programs for advancing rule of law and combating narcotics production and trafficking.
 - Commander's Emergency Response Program, which enables U.S. commanders in Afghanistan to carry out small-scale projects designed to meet urgent humanitarian relief and reconstruction needs in their areas of responsibility.
 - Afghanistan Infrastructure Fund, which supports high-priority, large-scale infrastructure projects that support the U.S. civilian-military effort in Afghanistan.
 - Task Force for Business and Stability Operations, which supports projects to help reduce violence, enhance stability, and support economic normalcy through strategic business and economic opportunities.
 - DOD Drug Interdiction and Counter-drug Activities, which supports efforts to stabilize Afghanistan by combating the drug trade and related activities.

The major categories of reconstruction efforts for these funds are (1) security, (2) governance and development, (3) humanitarian, and (4) civilian operations. The primary agencies responsible for supporting these reconstruction efforts are DOD, State, and USAID. SIGAR and the OIGs at DOD, State, and USAID are responsible for performing audits to identify potential waste, fraud, and abuse in DOD contracts and other federal agency contracts for the logistical support of coalition forces and for security and reconstruction functions in Afghanistan.

As shown in table 5, the audit and inspection reports issued by SIGAR from January 1, 2015, through September 30, 2016, related primarily to awarding and administering reconstruction contracts. For example, in September 2009, USAID awarded \$51.8 million to a firm for implementation of an Afghan Sustainable Water Supply and Sanitation Project to improve the long-term sustainability of potable water supply and sanitation services, improve the hygiene behaviors of poor and vulnerable populations in Afghanistan through a hygiene education campaign, and strengthen local community capacity for water supply management. According to its January 2015 audit report, SIGAR examined \$42 million in related expenditures to (1) report on any

identified material weaknesses or significant deficiencies;³¹ (2) report on any identified instances of material noncompliance with terms of the award and applicable laws and regulations, including potential fraud or abuse; (3) determine and report on whether the firm had taken corrective action on prior findings and recommendations; and (4) express an opinion on the fair presentation of the firm's Special Purpose Financial Statement.³² SIGAR also issued an audit in August 2015 related to building Afghan governance capacity and sustaining U.S. investment in Afghan institutions and infrastructure. That audit focused on determining the extent to which (1) State and the United Nations High Commissioner for Refugees verified the number of Afghan refugees in Pakistan and Iran and (2) the Afghan government implemented the Solutions Strategy.³³

DOD OIG Oversight Areas of Focus

In its role as the Lead IG for Operation Freedom's Sentinel, DOD OIG focuses its oversight efforts on two main missions:

- the Operation Freedom's Sentinel counterterrorism mission against the remnants of al Qaeda and its associates and against the Islamic State-Khorasan and their affiliates in Afghanistan and
- the Operation Freedom's Sentinel Resolute Support mission, which is working with NATO allies to train, advise, and assist the Afghan National Defense and Security Forces.

While the oversight jurisdiction of the Lead IG for Operation Freedom's Sentinel is limited to the scope of these two missions, the oversight jurisdiction of DOD OIG, State OIG, and USAID OIG extend to all programs and operations of their respective agencies, including all

³¹A material weakness is a deficiency, or combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit the attention of those charged with governance.

³²Special Inspector General for Afghanistan Reconstruction, *USAID's Afghan Sustainable Water Supply and Sanitation Project: Audit of Costs Incurred by ARD, Inc.*, SIGAR 15-28-FA (Arlington, Va.: January 2015).

³³Special Inspector General for Afghanistan Reconstruction, *Afghan Refugees and Returnees: Corruption and Lack of Afghan Ministerial Capacity Have Prevented Implementation of a Long Term Refugee Strategy*, SIGAR 15-83-AR (Arlington, Va.: August 2015).

programs and operations that these agencies conduct in Afghanistan. Overall, DOD OIG issued 14 reports from January 1, 2015, through September 30, 2016, related to six of the seven strategic oversight areas, as shown in table 5. For example, DOD OIG issued 3 reports focused on U.S. and coalition efforts in developing Afghan capabilities, which covered the first strategic oversight area: building capacity and capabilities of the Afghan National Defense and Security Forces and administering and maintaining accountability of the Afghan Security Forces Fund. One of the 3 reports, issued in April 2015, focused on DOD OIG's evaluation of (1) the train, advise, and assist relationship of U.S. and coalition forces with the Afghan Ministry of Defense and the Afghan Ministry of Interior regarding the development and sufficiency of regulations and procedures for the procurement, receipt, accountability, distribution, and consumption of ammunition and fuel; (2) Afghan National Security Force's (ANSF) compliance with accountability procedures and internal controls for ammunition, explosives, and fuel at national and regional commands; (3) ANSF's ammunition, explosives, and fuel distribution and accountability systems for significant gaps and vulnerabilities; and (4) ANSF's storage facilities for ammunition, explosives, and fuel for security gaps and vulnerabilities.³⁴ Additionally, from January 1, 2015, through September 30, 2016, DOD OIG issued 5 reports covering the strategic oversight area of contract management and oversight, including a report issued in August 2016 on whether contracting officer's representatives were properly appointed and trained and able to effectively perform their oversight responsibilities for contracts performed in Afghanistan.³⁵

State OIG Oversight Areas of Focus

State OIG focused the majority of its audits, inspections, and evaluations on the strategic oversight area of contract management and oversight. For example, State OIG issued an audit report in June 2015 focused on the extent to which State's grants officer representatives were selected and trained to successfully perform their assigned grant administration

³⁴Department of Defense, Office of Inspector General, *Assessment of U.S. and Coalition Efforts to Develop the Sufficiency of Afghan National Security Forces' Policies, Processes, and Procedures for the Management and Accountability of Class III (Fuel) and V (Ammunition)*, DODIG-2015-108 (Alexandria, Va.: April 2015).

³⁵Department of Defense, Office of Inspector General, *Designation of Contracting Officer's Representatives and Oversight Framework Could Be Improved for Contracts in Afghanistan*, DODIG-2016-0131 (Alexandria, Va.: August 2016).

and oversight responsibilities.³⁶ In addition, State OIG issued a report in February 2015 regarding its review of reports of staffing shortfalls within the Kabul Embassy Security Force.³⁷

USAID OIG Oversight Areas of Focus

The majority of USAID OIG's oversight activities focused on financial audits that provided opinions on statements of costs incurred for specified awards and on statements of cost sharing. These audits primarily focused on the strategic oversight areas of (1) building the Afghan governance capacity and sustaining U.S. investment in Afghan institutions and infrastructure and (2) awarding and administering reconstruction contracts.³⁸ From January 1, 2015, through September 30, 2016, USAID OIG issued 26 financial and 2 performance audits related to building the Afghan governance capacity and sustaining U.S. investment in Afghan institutions and infrastructure. For example, in January 2015, USAID OIG issued an audit report on the Afghan Ministry of Finance Salary Support Program³⁹ and, in February 2016, issued an audit report on the Irrigation and Watershed Management Program.⁴⁰ These audits included objectives such as (1) expressing an opinion on the Schedule of Costs Incurred or the Fund Accountability Statement for items directly procured by USAID; (2) evaluating the recipient's internal control related to USAID-funded programs; (3) performing tests to determine whether the recipient complied, in all material respects, with the agreement or contract terms and applicable laws and regulations related to USAID-funded programs;

³⁶Department of State, Office of Inspector General, *Audit of Department of State Oversight Responsibilities, Selection, and Training of Grants Officer Representatives*, AUD-CG-15-33 (Arlington, Va.: June 2015).

³⁷Department of State, Office of Inspector General, *Information Report: Kabul Embassy Security Force Inquiry*, ESP-15-02 (Arlington, Va.: February 2015).

³⁸USAID OIG's financial audits are generally conducted by external independent public accounting firms.

³⁹U.S. Agency for International Development, Office of Inspector General, *Closeout Audit of USAID Resources Managed by Government of the Islamic Republic of Afghanistan, Ministry of Finance, Under the Salary Support Program, Implementation Letters No. 306-IL-10-06-01 and 306-IL-10-06-02, for the Period from October 1, 2010, to February 18, 2012*, F-306-15-014-N (Kabul, Afghanistan: January 2015).

⁴⁰U.S. Agency for International Development, Office of Inspector General, *Financial Audit of Costs Incurred by Perini Management Services, Inc. (PMSI) Under the Irrigation and Watershed Management Program (IWMP), Task Order 306-AID-306-TO-13-00002, for the Period December 21, 2012, to December 31, 2014*, F-306-16-007-N (Kabul, Afghanistan: February 2016).

and (4) determining if the adequate corrective actions have been taken on prior audit recommendations.

Additionally, USAID OIG issued 17 audit reports focused on the strategic oversight area of awarding and administering reconstruction contracts. For example, in February 2016, USAID OIG issued an audit report expressing an opinion on whether the schedule of costs incurred by a university for two USAID programs, Advancing Afghan Agriculture Alliance and Strengthening Afghanistan Agricultural Faculties, presented fairly, in all material respects, the revenue received and costs incurred. The audit, covering expenditures totaling over \$8 million, also evaluated the auditee's internal control and compliance with laws and regulations.⁴¹

OIG Coordination Helped Prevent Duplication in Oversight Activities, but Agreed-Upon Roles and Responsibilities for Reporting Have Not Been Documented

As presented earlier, the enabling legislation for SIGAR and the OIGs at DOD, State, and USAID contain overlapping provisions related to oversight areas, duties and responsibilities, authorities, and reporting requirements. To help prevent duplication, these mandates include provisions requiring SIGAR and the other OIGs to coordinate their oversight activities. For example, the NDAA for Fiscal Year 2008 requires SIGAR to coordinate and receive cooperation from the OIGs at DOD, State, and USAID in conducting oversight activities of Afghanistan reconstruction efforts.⁴² In addition, the NDAA for Fiscal Year 2013 requires the Lead IG to manage coordination between the DOD, State, and USAID OIGs in providing oversight of the overseas contingency operation in Afghanistan, Operation Freedom's Sentinel.⁴³ OIG efforts to coordinate these activities, if effective, should help prevent duplication of oversight of and reporting related to U.S. operations in Afghanistan.

SIGAR and the OIGs performing audit work of U.S. operations in Afghanistan have taken numerous steps to collaborate and coordinate

⁴¹U.S. Agency for International Development, Office of Inspector General, *Audit of Costs Incurred in Afghanistan by Purdue University Under the Advancing Afghan Agriculture Alliance Program, Cooperative Agreement No. 306-A-00-07-00509 (Close-Out); and the Strengthening Afghanistan Agricultural Faculties Program, Cooperative Agreement No. 306-A-00-11-00516, for the period March 14, 2007, to June 30, 2015*, F-306-16-008-N (Kabul, Afghanistan: February 2016).

⁴²NDAA for Fiscal Year 2008, § 1229(f)(4). Additionally, section 4(c) of the IG Act requires IGs to give particular regard to the activities of GAO, with a view toward avoiding duplication and ensuring effective coordination and cooperation.

⁴³IG Act, § 8L(d)(2).

their audit oversight activities to avoid duplication of their efforts consistent with the SIGAR and the Lead IG authorizing statutes.⁴⁴ However, we identified one area related to overlapping reporting requirements where agreed-upon roles and responsibilities were not documented.

OIG Coordination Helped Prevent Duplication of Oversight Activities

According to SIGAR and OIG officials, SIGAR and the OIGs at DOD, State, and USAID have several mechanisms in place that are intended to effectively and efficiently coordinate oversight activities and prevent duplicative efforts. Two key mechanisms used to plan, coordinate, report, and share information on audits, evaluations, and inspections in Afghanistan are the (1) Southwest Asia Joint Planning Group and the (2) COP-OCO. In addition to these efforts, other informal coordination occurs periodically during the year through other meetings or communications to help reasonably assure that new OIG work is not duplicative.⁴⁵

- **Southwest Asia Joint Planning Group.** The Southwest Asia Joint Planning Group is an interagency planning group that meets quarterly, and more frequently if needed, to discuss and identify duplication in potential projects and potential gaps in oversight. The Southwest Asia Joint Planning Group was established in April 2007 by DOD OIG, and its members are DOD OIG, State OIG, USAID OIG, GAO, SIGAR, U.S. Army Audit Agency, Naval Audit Service, and Air Force Audit Agency. During these meetings, the OIGs and other agencies discuss oversight efforts, including those related to Afghanistan. As part of the group's annual planning process, the OIGs develop audit plans for their respective agencies. After developing these plans, SIGAR and the OIGs at DOD, State, and USAID participate in joint strategic planning efforts with all entities performing oversight work in Afghanistan. The Southwest Asia Joint Planning Group members provide information about ongoing and planned oversight activities to DOD OIG, which chairs the group. DOD OIG compiles and reviews

⁴⁴For the purposes of this report, we use "collaboration" broadly to include interagency activities that others have variously defined as "cooperation," "coordination," "integration," or "networking."

⁴⁵In addition to SIGAR and the OIGs at DOD, State, and USAID, other oversight entities collaborate or participate in the planning for oversight of U.S. operations in Afghanistan, including the U.S. Army Audit Agency, Naval Audit Service, Air Force Audit Agency, and GAO.

this information and subsequently distributes it to the members to review, identify, coordinate, and resolve any potential duplication issues directly with other members in the group. When a potential duplicative planned project, error, or omission is identified, the members meet to discuss and clarify the objectives, focus, or dates of a project. As a result of these discussions, a project may be withdrawn, canceled, or terminated.

- **COP-OCO.** The COP-OCO is an annual plan that includes descriptions of oversight projects and objectives that directly affect efforts associated with overseas contingency operations in various Southwest Asia countries and surrounding areas. The COP-OCO includes the Joint Strategic Oversight Plan for Afghanistan. A COP-OCO strategic plan for each fiscal year contains all of the planned audits, inspections, and evaluations of SIGAR; the OIGs at DOD, State, and USAID; and the other oversight entities and classifies the oversight work by strategic oversight area. DOD OIG monitors the status of all proposed, in-process, and completed audits and updates the COP-OCO each month so unplanned high-priority projects that arise midyear can be incorporated into the current plan for tracking purposes and included in the COP-OCO for the next fiscal year.

In addition to annually coordinating oversight plans, SIGAR and the OIGs at DOD, State, and USAID send notification e-mails or draft notification letters to the other OIGs throughout the year before starting audits as another means to help prevent potential duplication. The OIGs at DOD, State, and USAID have also documented their roles and responsibilities in a memorandum of intent, as well as their intent to continue collaborating and coordinating efforts to effectively and efficiently comply with oversight requirements. Investigators and many of the auditors in Afghanistan for SIGAR and for the OIGs at DOD, State, and USAID are also colocated, which officials stated allows teams working in Afghanistan to share information on an ongoing basis and stay informed about what other OIGs are doing. For example, ongoing oversight activities are discussed during monthly group audit meetings during which overlap or duplication issues can be resolved.

In addition, SIGAR and the other OIGs performing oversight in Afghanistan have different methods by which they inform their respective agencies of their planned audit work and coordination efforts. For example, see the following:

- SIGAR officials stated that their communication with agency liaisons and other non-OIG personnel is primarily through SIGAR's strategic

plan, agency protocols, and standard language in their notification letters. In addition, occasional discussions via e-mail and in person may occur. For example, SIGAR's strategic plan for 2014 through 2016, which is posted on its website, included information about coordination with the OIGs. SIGAR officials also stated that they prepared their agency protocols, also available on the SIGAR website, with input from USAID, DOD, and State officials. These protocols describe SIGAR's major products and summarize the audit and inspection process, including coordination with the other OIGs. Another method SIGAR uses to inform auditees of ongoing coordination efforts is standard language included in its performance and financial audit notification letters indicating that "we coordinated this notification with other Inspector General offices and the U.S. Government Accountability Office" or "will continue to coordinate with GAO and other OIGs to reduce duplication."

- DOD OIG officials stated that key agency personnel from DOD components, such as the U.S. Central Command and the Combatant Commands, are regular participants in the Southwest Asia Joint Planning Group meetings where the OIG representatives discuss potential audit work for Afghanistan. During these meetings, key personnel receive copies of current and planned oversight projects. Meeting discussions also include highlights of planned projects, including project scope and key milestone dates. Copies of the annual COP-OCO and quarterly updates are provided to all participants of the joint meeting. Also, the COP-OCO annual plan is posted to the DOD OIG website, making available information on all audit work planned for Afghanistan for the year.
- State and USAID OIG officials stated that they do not have formal processes for informing agency personnel of their coordination process with SIGAR but communicate their processes through conversations or other interactions. For example, State OIG officials said that their office interacts regularly with the State Department leadership in both Washington, D.C., and in Kabul and that the State Department leadership is aware of OIG and SIGAR oversight work in Afghanistan. USAID OIG officials stated that they have discussed with USAID personnel the scope of audit work selected by SIGAR for USAID audits and have also discussed the COP-OCO process in general terms.

Based on our review of the objectives of 137 audit, inspection, and evaluation reports issued by SIGAR and the OIGs at DOD, State, and USAID from January 1, 2015, through September 30, 2016, we did not identify duplicate objectives among the reports issued by these OIGs. In

addition, we reviewed 43 special projects issued by SIGAR and did not identify any duplication between these products and the reported objectives of the audit, inspection, or evaluation reports issued by the OIGs at DOD, State, and USAID during this period.⁴⁶

The planning process for investigative work is not conducted in the same manner as the audit planning process and is not reflected in the COP-OCO.⁴⁷ Rather, the OIGs at DOD, State, and USAID have entered into memorandums of understanding (MOU) to help coordinate investigative work. One MOU between SIGAR and the OIGs at DOD, State, and USAID, as well as other investigative entities, established the International Contract Corruption Task Force as a joint agency endeavor to facilitate management of task force investigations.⁴⁸ Another MOU executed in 2015, between the OIGs at DOD, State, and USAID, as well as other investigative entities, established and formalized relationships between and among the entities with a goal of combining resources for investigating fraud and corruption in contracts and agreements related to overseas contingency operations.⁴⁹ These MOUs and other memorandums help to formally define and document the roles and responsibilities of the various parties regarding investigations in Afghanistan.

⁴⁶In determining duplication in oversight, we checked whether the objectives reviewed called for the exact same steps to be taken by the different OIGs.

⁴⁷Because investigations are performed jointly with entities not included in the scope of our audit, such as the Federal Bureau of Investigation, we did not review the population of individual reports of closed investigations.

⁴⁸The initial MOU dated July 2008 included the OIGs at DOD, State, and USAID as well as the Federal Bureau of Investigation and the U.S. Army Criminal Investigation Command. Through subsequent amendments, the Naval Criminal Investigative Service, the Air Force Office of Special Investigations, and SIGAR were added to this MOU.

⁴⁹*Memorandum of Understanding Regarding Operation of Lead Inspector General Fraud and Corruption Investigative Working Groups for Overseas Contingency Operations* (June 12, 2015).

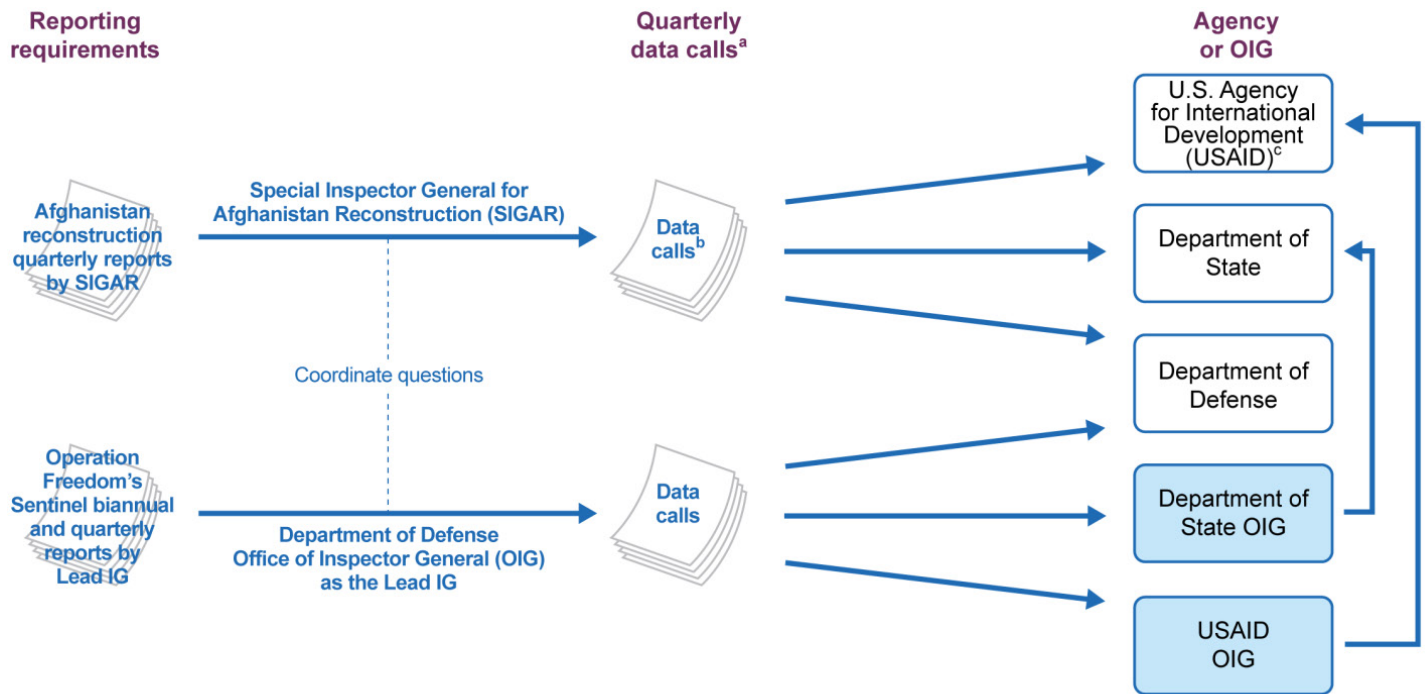
OIGs Are Coordinating to Meet Reporting Requirements, but Agreement on Roles and Responsibilities Has Not Been Documented

To meet their respective reporting requirements, SIGAR and DOD OIG, as the Lead IG for Operation Freedom's Sentinel, request information from agencies with programs and operations in Afghanistan through a "data call" process (see fig. 1). For example, to meet its quarterly reporting requirements, SIGAR sends a data call requesting Afghanistan reconstruction-related information to DOD, State, USAID and other agencies, and in response, these agencies are expected to provide the requested information to SIGAR.⁵⁰ In addition, according to DOD OIG officials, to meet the Lead IG quarterly and biannual reporting requirements for Operation Freedom's Sentinel, DOD OIG, as the Lead IG, sends a quarterly data call to DOD and coordinates with State OIG and USAID OIG to obtain the information needed.⁵¹ SIGAR and the Lead IG each has its own documented process for preparing its quarterly reports, consisting of calendars, timelines, and procedure manuals.

⁵⁰SIGAR officials stated that SIGAR also provides its data call questions and responses received from agencies to DOD OIG.

⁵¹According to DOD OIG officials, USAID only receives data calls from SIGAR because it is not involved in Operation Freedom's Sentinel. However, DOD OIG in its Lead IG role receives USAID Afghanistan-related information that is obtained through coordination with USAID OIG.

Figure 1: SIGAR and Lead Inspector General (Lead IG) Data Call Processes Used to Meet Mandated Reporting Requirements



Source: GAO analysis based on information obtained from SIGAR and Lead IG documentation and officials. | GAO-18-6

^aSIGAR and the Lead IG officials indicated that they share the data call information and that the Lead IG schedules the issuance of its data call 2 weeks after SIGAR's.

^bSIGAR also sends a data call to and receives information from the Department of Justice, the Department of the Treasury, and the Drug Enforcement Administration. These agencies were outside the scope of our audit.

^cAccording to DOD OIG officials, USAID only receives a data call from SIGAR because it is not involved in Operation Freedom's Sentinel. However, DOD OIG in its Lead IG role receives USAID Afghanistan-related information that is obtained through coordination with USAID OIG.

According to SIGAR and Lead IG officials, SIGAR and Lead IG data calls for their quarterly reports initially resulted in DOD and State receiving two sets of data calls at the same time that in some instances requested duplicate information. According to SIGAR officials, in June 2016, when SIGAR and the Lead IG became aware of these duplicative data calls, they began to collaborate informally on the data call process through meetings and e-mails to address areas of duplication, and the process subsequently evolved. SIGAR and the Lead IG officials indicated that they began sharing the information obtained from data calls to meet their respective reporting requirements and that the Lead IG scheduled the issuance of its data call 2 weeks after SIGAR's to help alleviate unnecessary burden on the responding agencies. The OIG officials stated

that as a result of their collaborative efforts, SIGAR and DOD OIG, as Lead IG, have reduced the number of questions included in their requests for information going to the agencies. Based on our review of approximately 200 questions contained in SIGAR and DOD OIG data calls related to their fourth quarter fiscal year 2016 reports, we did not identify duplication in information requested from DOD and State.⁵²

SIGAR and DOD OIG, as Lead IG, coordination efforts to meet their respective reporting requirements have been informal and evolving, and as such, SIGAR and DOD OIG have not documented their agreed-upon roles and responsibilities, including efforts to address overlapping areas included in their reports. Our leading collaboration practices for effective interagency collaboration suggest that to help enhance and sustain collaboration among federal agencies, agencies should agree on roles and responsibilities.⁵³ For example, these practices state that collaborating agencies should work together to define and agree on their respective roles and responsibilities, including how the collaborative effort will be led. In doing so, agencies can clarify who will do what, organize their joint and individual efforts, and facilitate decision making. According to these practices, articulating agreements in formal documents and updating them, as needed, can also help entities strengthen their commitment to working collaboratively. For example, the written document could incorporate agreements on areas such as leadership, accountability, roles and responsibilities, and resources.

Without documented agreement on roles and responsibilities, SIGAR and DOD OIG, as Lead IG, may not be effectively and efficiently utilizing their resources. In addition, there is increased risk that duplication of requests for information could occur and, as a result, create unnecessary burden on the staff and agencies responding to them. Further, as individuals and their positions may change over time, documentation of the agreed-upon roles and responsibilities is important to ensure ongoing and consistent implementation of collaborative efforts.

⁵²Although SIGAR and DOD OIG questions were not duplicative, in some instances they related to similar topics but asked for different levels of information (e.g., detailed vs. broad).

⁵³GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

Conclusions

Effective coordination is key to achieving efficiencies and preventing unnecessary duplication in oversight activities conducted by OIGs related to billions of dollars appropriated to address U.S. operations in Afghanistan each year. This is especially important as multiple agencies are involved and overlap exists in OIGs' responsibilities for oversight and reporting related to these operations. SIGAR and the OIGs at DOD, State, and USAID have been coordinating their oversight activities for many years and have established key mechanisms to facilitate ongoing collaboration of their oversight activities. Activation of Operation Freedom's Sentinel in 2015 triggered additional reporting requirements for DOD OIG, as Lead IG, that overlap with SIGAR's reporting requirements related to Afghanistan reconstruction efforts. SIGAR and DOD OIG, as Lead IG, have taken steps to coordinate and collaborate on their efforts to meet these requirements. However, they have not documented their agreed-upon roles and responsibilities related to their reporting requirements consistent with leading practices for effective interagency collaboration.

Without documented agreement on roles and responsibilities and careful coordination related to their reporting requirements, SIGAR and DOD OIG, as Lead IG, are at increased risk of unnecessary duplication of efforts in meeting these requirements and potentially increasing the burden on agencies providing information to them.

Recommendations for Executive Action

We are making a total of two recommendations, including one to SIGAR and one to the DOD Inspector General, as Lead IG for Operation Freedom's Sentinel. Specifically:

SIGAR, in collaboration with the DOD IG, as Lead IG, should document agreed-upon roles and responsibilities related to interagency collaboration with DOD OIG to address overlapping areas included in their required reports and update them, as needed. (Recommendation 1)

The DOD IG, as Lead IG, in collaboration with SIGAR, should document agreed-upon roles and responsibilities related to interagency collaboration with SIGAR to address overlapping areas included in their required reports and update them, as needed. (Recommendation 2)

Agency Comments and Our Evaluation

We provided a draft of this report to SIGAR and the IGs of DOD, State, and USAID for comment.

- In their joint written comments, reproduced in appendix II, SIGAR and the IGs of DOD, State, and USAID agreed to adopt our recommendations made to the DOD IG and SIGAR. The joint comments also raised concerns with the draft report title and Highlights.
- SIGAR also provided separate written comments, reproduced in appendix III. In its separate letter, SIGAR disagreed with the title, Highlights, and conclusions and the need for the recommendation.
- The USAID IG also provided separate written comments, reproduced in appendix IV. The USAID IG, as reflected in the other comment letters, reiterated the view that the draft report title was inconsistent with the report's major findings and conclusions.

All four OIGs provided technical comments, which we incorporated as appropriate.

Joint Comments from SIGAR and the IGs at DOD, State, and USAID

In their joint comments, SIGAR and the IGs at DOD, State, and USAID said that they take seriously their individual and collective responsibility to ensure that oversight is properly conducted and coordinated among the IGs. They expressed their appreciation that we recognized the formal and informal coordination processes they used to avoid duplication in the oversight objectives of the reports we reviewed, as well as the effective coordination used by SIGAR and DOD OIG, as Lead IG, in preventing duplication in the information requested for quarterly reporting. The joint comments also stated that despite the robust coordination that has been taking place, they are willing to adopt the recommendations made to the DOD IG and SIGAR. The joint comments also stated that they believed the title and the Highlights were not balanced. In contrast to the title, they stated that the conclusions section of the report is balanced and asked that we reconsider the title of the report and the Highlights section to provide this balance. We modified the title and Highlights to reflect that our finding and related recommendation were specifically related to documentation of agreed-upon roles and responsibilities for meeting reporting requirements.

Special Inspector General for Afghanistan Reconstruction

In its separate comment letter, SIGAR stated that it is committed to ensuring that U.S. taxpayer funds are used effectively and efficiently, and preventing waste, fraud, and abuse, particularly in Afghanistan. SIGAR described its position as the only OIG with the interagency authority to oversee the activities of all U.S. government agencies and international organizations that receive U.S. funding for Afghanistan reconstruction. SIGAR also detailed the positive impacts of the ongoing and planned oversight activities it is conducting, including the monetary and nonmonetary achievements from its audits and investigations. SIGAR further stated that it supports GAO's findings but disagrees with the title, Highlights page, and the conclusions. As stated above, we modified the title and the Highlights. Further, the joint letter, also signed by SIGAR, specifically stated that the conclusions section of the report is balanced, noting the long-standing coordination efforts that have proved successful. Nonetheless, we modified the conclusions section to clarify that the need for documenting agreed-upon roles and responsibilities relates to SIGAR and DOD OIG reporting requirements.

SIGAR's response further stated that it was unclear what the intent of the recommendation was and what deficiency it seeks to address. SIGAR also stated that our analysis found no duplication in any of the objectives for the 180 audit, inspection, and evaluation reports and the special projects issued by the four OIGs we reviewed. We agree that duplication did not exist in the objectives for the reports we reviewed. We modified our recommendation to clarify that it is not directed at the OIGs' coordination of oversight activities.

SIGAR stated that the only potential concern raised in our report was SIGAR's and DOD OIG's mandated quarterly reports on the reconstruction effort in Afghanistan and Operation Freedom's Sentinel, respectively. SIGAR stated that SIGAR and DOD OIG addressed this issue over the past year. SIGAR further stated that we did not identify any duplication in the approximately 200 questions included in SIGAR's and DOD OIG's data calls for the fourth quarter fiscal year 2016 reports. SIGAR stated that it fully supports any recommendation that improves SIGAR's operations, but stated its view that our report does not present any evidence that duplication exists or any evidence that there is a risk of duplication in the future.

We found that the risk of duplicative reporting activities was increased with the activation of Operation Freedom's Sentinel in 2015, triggering additional reporting requirements for DOD OIG, as Lead IG, that overlap with SIGAR's reporting requirements related to Afghanistan

reconstruction efforts. Although we did not identify duplication in the data calls for the one quarter we reviewed, we did identify overlapping subject matters that could pose potential for duplication in future data calls. In addition, as noted in our report, the coordination efforts of SIGAR and DOD OIG to meet their reporting requirements have been informal and evolving. Documenting agreed-upon roles and responsibilities to address overlapping areas included in their reports could achieve efficiencies, help prevent duplication of efforts in the future, and minimize agencies' reporting burden. Our leading practices for effective interagency collaboration suggest that to help enhance and sustain collaboration among federal agencies, agencies should agree on roles and responsibilities. According to these practices, articulating agreements in formal documents and updating them, as needed, can also help entities strengthen their commitment to working collaboratively. Further, as individuals and their positions may change over time, documentation of the agreed-upon roles and responsibilities is important to ensure ongoing and consistent implementation of collaborative efforts.

U.S. Agency for
International
Development, Office of
Inspector General

In its separately issued comment letter, the USAID IG stated that she takes seriously the OIG's responsibility to coordinate with SIGAR and the OIGs at DOD and State to provide effective oversight in Afghanistan while minimizing the burden on the agencies the OIGs oversee. The USAID IG stated that SIGAR and the OIGs all share the same goal of enhancing their agencies' ability to efficiently and effectively carry out their important missions in a country that is central to U.S. national security. The USAID IG, as reflected in the other comment letters, reiterated the view that the title is inconsistent with the report's major findings and conclusions. As stated above, we modified the report title.

We are sending copies of this report to the appropriate congressional committees, the Special Inspector General for Afghanistan Reconstruction, the Inspector General of the Department of Defense, the Inspector General of the Department of State, the Inspector General of the U.S. Agency for International Development, the Secretary of Defense, the Secretary of State, the Administrator of the U.S. Agency for International Development, and other interested parties. In addition, the 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) 512-2623 or davisbh@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 V.

A handwritten signature in cursive script that reads "Beryl H. Davis".

Beryl H. Davis
Director
Financial Management and Assurance

Appendix I: Objectives, Scope, and Methodology

The objectives for this audit were to determine (1) the scope of the enabling legislation for the Special Inspector General for Afghanistan Reconstruction (SIGAR) and the Offices of Inspector General (OIG) at the Department of Defense (DOD), Department of State (State), and the U.S. Agency for International Development (USAID) with respect to oversight of U.S. operations in Afghanistan and the extent to which overlap, if any, exists among the mandates of each OIG; (2) the oversight activities and primary areas of focus for SIGAR and the OIGs at DOD, State, and USAID regarding U.S. operations in Afghanistan for the time period January 1, 2015, through September 30, 2016; and (3) the extent to which SIGAR and the OIGs at DOD, State, and USAID coordinated their oversight of U.S. operations in Afghanistan to help prevent duplication during the period January 1, 2015, through September 30, 2016.

To determine the scope of the enabling legislation for SIGAR and the OIGs at DOD, State, and USAID regarding oversight of U.S. operations in Afghanistan, we researched and identified the enabling legislation governing their respective oversight of these operations, which includes the Inspector General Act of 1978, as amended (IG Act);¹ the National Defense Authorization Act (NDAA) for Fiscal Year 2008;² and the NDAA for Fiscal Year 2013.³ We summarized significant provisions of these laws, including duties, responsibilities, and select authorities. We also interviewed officials at SIGAR and the OIGs at DOD, State, and USAID to gain an overall understanding of their missions, oversight authorities, and activities regarding U.S. operations in Afghanistan. To determine the extent of overlap, as defined in GAO's *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*,⁴ we performed a detailed comparison of the applicable oversight provisions contained in these laws regarding SIGAR and the three OIGs' oversight of U.S. operations in Afghanistan. Specifically, to determine if overlap existed among the statutes, we analyzed and compared the applicable provisions from the IG Act (as amended), the NDAA for Fiscal Year 2008, and the NDAA for Fiscal Year 2013 related to oversight areas, duties and responsibilities, authorities, and reporting requirements.

¹Pub. L. No. 95-452, 92 Stat. 1101 (Oct. 12, 1978), *codified as amended at* 5 U.S.C. App.

²Pub. L. No. 110-181, 122 Stat. 3 (Jan. 28, 2008).

³Pub. L. No. 112-239, 126 Stat. 1632 (Jan. 2, 2013).

⁴GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*, [GAO-15-49SP](#) (Washington, D.C.: Apr. 14, 2015).

To determine the oversight activities and primary areas of focus for SIGAR and the OIGs at DOD, State, and USAID regarding U.S. operations in Afghanistan for the time period January 1, 2015, through September 30, 2016, we reviewed their annual and strategic plans and interviewed officials from SIGAR and the OIGs for DOD, State, and USAID. To identify the population of oversight reports the OIGs issued during this period, we obtained a list of reports from each of the OIGs. To validate the accuracy of the lists, we reviewed quarterly reports issued by the OIGs and researched their websites. For the 137 reports we identified, we classified the reports by the strategic oversight areas associated with them, as indicated in the applicable comprehensive oversight plans for contingency operations as well as the quarterly reports. We summarized the number of reports related to each strategic oversight area and confirmed the final population of 137 audit, inspection, and evaluation reports issued, along with their strategic oversight area classifications, with SIGAR and the OIGs at DOD, State, and USAID.

To determine the number of investigations that SIGAR and the three other OIGs conducted, we reviewed information reported on closed investigations that was included in the quarterly reports issued by SIGAR and DOD OIG, in its role as Lead Inspector General (Lead IG) for Operation Freedom's Sentinel, for the period January 1, 2015, through September 30, 2016. In addition, we interviewed officials from SIGAR and the OIGs for DOD, State, and USAID to obtain an understanding of their processes for planning and coordinating investigations. Because investigations are not planned in a manner similar to audits, inspections, and evaluations, they are not included in the annual comprehensive oversight plans for overseas contingency operations or categorized by strategic oversight area.⁵ We did not obtain or review the reports for investigations closed from January 1, 2015, through September 30, 2016.

To determine the extent of coordination among SIGAR and the OIGs at DOD, State, and USAID, we reviewed relevant documentation provided by SIGAR and the OIGs at DOD, State, and USAID in support of their oversight coordination activities. We also interviewed OIG officials responsible for coordinating oversight activities and reporting requirements to obtain an understanding of their processes and related efforts to coordinate and prevent duplication. In obtaining an

⁵The investigations conducted for U.S. operations in Afghanistan are, in most cases, conducted jointly with other law enforcement agencies outside the scope of our audit.

understanding of their coordination process, we also inquired and obtained evidence of the OIGs' efforts to inform their respective agencies of how they coordinate their work to avoid oversight duplication. To assess their coordination efforts to help prevent duplication of work, we compiled the reported objectives of the 137 audit, inspection, and evaluation reports issued by SIGAR and the OIGs at DOD, State, and USAID from January 1, 2015, through September 30, 2016, and compared the objectives from each of SIGAR's reports to the objectives of the reports issued by the OIGs at DOD, State, and USAID.⁶ The purpose of this comparison was to identify any matches that would indicate duplication in the objectives of the reports. Specifically, we completed this comparison by reading each objective and performing key word searches on certain items contained in the objectives, including subject matter; contractor name; contractor number; and time period of the audit, inspection, or evaluation. We also reviewed and compared the objectives of 43 special project products issued by SIGAR with the 137 audit, inspection, and evaluation reports using this same method to identify any matches that indicated duplication.

To assess the coordination of SIGAR and the Lead IG reporting efforts, we reviewed relevant documentation and conducted additional interviews with SIGAR and DOD OIG officials responsible for preparing the required reports and administering data calls used to request and obtain agency data necessary for preparing them. To further assess their data call coordination efforts to meet their reporting requirements, we reviewed sets of the questions developed separately by SIGAR and DOD OIG, in its role as the Lead IG for Operation Freedom's Sentinel, for the quarterly reports covering the fourth quarter of fiscal year 2016. For these data calls, we compared the sets of questions sent to the agencies and performed key word searches to identify duplication in the information requested. We also used GAO's leading practices on effective interagency collaboration that provide key considerations for implementing mechanisms for effective collaboration.⁷

⁶Included in our review of the 137 audits were 44 financial audits resulting from USAID contracts with various independent public accounting firms to perform audits of contractors and grantees in Afghanistan. For these audits, which have similar financial objectives, our review consisted of checking the contractor name, contract number, subject matter of the audit, as well as the time period covered by the audit to determine if there was duplication with SIGAR, DOD OIG, and State OIG work.

⁷GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington D.C.: Sept. 27, 2012)

We conducted this performance audit from July 2016 to November 2017 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: Joint Comments from SIGAR and the Offices of Inspector General at DOD, State, and USAID



DoD OFFICE OF
INSPECTOR GENERAL



DoS OFFICE OF
INSPECTOR GENERAL



USAID OFFICE OF
INSPECTOR GENERAL



SPECIAL INSPECTOR GENERAL FOR
AFGHANISTAN RECONSTRUCTION

October 4, 2017

The Honorable Gene L. Dodaro
Comptroller General of the United States

Dear Mr. Dodaro:

We appreciate the opportunity to respond to the GAO Draft Report, GAO-18-6, *Inspectors General: Coordination Could Be Enhanced for Oversight of U.S. Operations in Afghanistan*, dated October 2017. This report, along with the complementary report we issued, *Inspector General Oversight Activities in Afghanistan*, dated February 2017, as directed by Section 1217, of the Fiscal Year (FY) 2017 National Defense Authorization Act, addresses how the Inspectors General (IGs) of the Department of Defense (DoD), the Department of State (DoS), the U.S. Agency for International Development, and the Special Inspector General for Afghanistan Reconstruction (SIGAR) coordinate and complete oversight reports, and publish quarterly reports on reconstruction and Operation Freedom's Sentinel.

We take seriously our individual and collective responsibility to ensure that oversight is properly conducted and coordinated among the IGs. To this end, as the GAO report noted, we engage in both formal and informal processes to provide adequate oversight coverage and to avoid duplication of our oversight efforts. As also noted in the draft report, one example of the formal oversight coordination process is the just-published FY 2018 *Comprehensive Oversight Plan for Overseas Contingency Operations* (COP-OCO), that we signed and issued on September 29, 2017.

We are pleased that the draft report recognized the formal and informal coordination processes by which we avoided duplication of oversight objectives in the 180 audit, inspection, and evaluation and special project reports we issued during the period January 1, 2015, through September 30, 2016 (see page 34). It is also noteworthy that the GAO team recognized effective coordination processes between SIGAR and the Lead IG. Moreover, the GAO did not identify any duplication in information requests made to the DoD and the DoS, after reviewing approximately 200 questions contained in the SIGAR and DoD OIG data calls, for the fourth quarter FY 2016 SIGAR and Lead IG reports (see pages 36-37).

Nevertheless, despite the robust coordination that has been taking place, we are willing to adopt the GAO recommendations made to the IGs of the DoD and SIGAR to better define and document agreed-upon roles and responsibilities related to interagency collaboration.

Finally, as noted in our previously provided technical comments on the draft report, we believe that the report title and the GAO Highlights page are not balanced. Contrary to the report itself, including the findings of the report that the many formal and informal coordination processes have prevented duplication of efforts, (see pages 31, 32, 34, and 36-37), the title and GAO Highlights imply inadequate coordination and focus only

**Appendix II: Joint Comments from SIGAR and
the Offices of Inspector General at DOD, State,
and USAID**



DoD OFFICE OF
INSPECTOR GENERAL



DoS OFFICE OF
INSPECTOR GENERAL



USAID OFFICE OF
INSPECTOR GENERAL



SPECIAL INSPECTOR GENERAL FOR
AFGHANISTAN RECONSTRUCTION

on one improvement (documentation) that could be made. The title does not fairly summarize the report itself, which found effective coordination and lack of duplication of information requests. In contrast to the title, the Conclusions section of the report is balanced, noting the longstanding coordination efforts that have proved successful. We are surprised that the title is not balanced and does not fairly reflect the findings of the report, and we request that you reconsider the title and GAO Highlights section to provide this balance.

In sum, we believe the efforts we have taken, described in the GAO draft report, demonstrate our commitment to providing comprehensive and coordinated oversight in Afghanistan. We will continue to seek opportunities to further coordinate our oversight efforts in this important and challenging responsibility.

Sincerely,

Glenn A. Fine
Lead Inspector General
Operation Freedom's Sentinel
Acting Inspector General
U.S. Department of Defense

Steve A. Linick
Inspector General
U.S. Department of State

Ann Calvaresi Barr
Inspector General
U.S. Agency for International
Development

John F. Sopko
Special Inspector General
for Afghanistan
Reconstruction

**Appendix II: Joint Comments from SIGAR and
the Offices of Inspector General at DOD, State,
and USAID**



DoD OFFICE OF
INSPECTOR GENERAL



DoS OFFICE OF
INSPECTOR GENERAL



USAID OFFICE OF
INSPECTOR GENERAL



SPECIAL INSPECTOR GENERAL FOR
AFGHANISTAN RECONSTRUCTION

Enclosure

RESPONSE TO GAO DRAFT REPORT
"Inspectors General: Coordination Could Be Enhanced for Oversight of U.S. Operations in Afghanistan"
DATED OCTOBER 2017
(GAO REPORT NUMBER 18-6)

RECOMMENDATION 1: SIGAR, in collaboration with DoD OIG as Lead IG should define and document agreed-upon roles and responsibilities related to interagency collaboration with the DoD OIG, including efforts to address overlapping areas included in their required reports and update them, as needed.

SIGAR RESPONSE: Concur.

RECOMMENDATION 2: The DoD Inspector General, as Lead IG, in collaboration with SIGAR should define and document agree-upon roles and responsibilities related to interagency collaboration with SIGAR, including efforts to address overlapping areas included in their required reports and update them, as needed.

DOD OIG RESPONSE: Concur.

Appendix III: Comments from the Special Inspector General for Afghanistan Reconstruction



SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

John F. Sopko
Special Inspector General

September 29, 2017

The Honorable Gene L. Dodaro
Comptroller General of the United States
U.S. Government Accountability Office

I appreciate the opportunity to comment on the Government Accountability Office's (GAO) draft report titled *Inspector General: Coordination Could Be Enhanced for Oversight of U.S. Operations in Afghanistan* (report number GAO-18-6). We share GAO's commitment to ensuring that U.S. taxpayer funds are used effectively and efficiently, and preventing waste, fraud, and abuse, particularly in Afghanistan.

SIGAR's Oversight of the U.S. Reconstruction Effort in Afghanistan

SIGAR continues to fulfill a critical need in the ongoing U.S. reconstruction effort in Afghanistan. As the only Office of Inspector General (OIG) with the interagency authority to oversee the activities of all U.S. government agencies and international organizations that receive U.S. funding for Afghanistan reconstruction, we conduct cross-cutting reviews of the Department of State (State), Department of Defense (DOD), the U.S. Agency for International Development (USAID), and other agencies involved in reconstruction programs. Because we focus solely on the reconstruction effort, we are able to examine reconstruction programs and issues in depth while still producing timely and high-quality work. This also helps our colleagues in the DOD, State, and USAID OIGs allocate resources to examining issues outside of the reconstruction effort, such as their respective agency's operations and the counter-terrorism mission. We conduct our oversight autonomously and report directly to Congress and to the Secretaries of State and Defense.

As the GAO report notes, SIGAR has the largest oversight presence in Afghanistan. Most of SIGAR's deployed staff serve at least 2 years in country. This practice reduces annual turnover compared to other U.S. agencies and mitigates the risk of institutional memory loss. Our deployed staff are supplemented by Afghan nationals who assist with audit, inspection, and investigative work.

SIGAR has taken steps to enhance its oversight of the reconstruction effort in Afghanistan. In 2012, SIGAR created its Office of Special Projects to examine emerging issues and deliver prompt, actionable products to the implementing agencies and Congress. Not mentioned in GAO's draft report is SIGAR's Lessons Learned Program (LLP). Established in late 2014, LLP's goal is to broadly document U.S. reconstruction objectives, assess results, and distill this knowledge into recommendations to improve reconstruction efforts in Afghanistan and in future contingency operations. In keeping with SIGAR's unique, interagency authority, LLP is able to extract and frame lessons from a whole-of-government perspective. LLP issued its first report, on corruption, in September 2016, within the timeframe of the GAO audit.¹ The report continues to be viewed positively within the U.S. government and international community, and led to a requirement from Congress in the Joint Explanatory Statement to the Consolidated Appropriations Act, 2017, for SIGAR to examine the Afghan government's anti-corruption initiatives and the steps the United States is taking to support these

¹ SIGAR, *Corruption in Conflict: Lessons from the U.S. Experience in Afghanistan*, SIGAR-16-58-LL, September 14, 2016.

1550 Crystal Drive, 9th Floor
Arlington, Virginia 22202

Mail: 2530 Crystal Drive
Arlington, Virginia 22202-3940

Tel: 703 545 6000

www.sigar.mil

Appendix III: Comments from the Special Inspector General for Afghanistan Reconstruction

efforts.² LLP issued its second report on security on September 21, 2017,³ and is examining economic development, counter-narcotics, and stabilization, among other issues, for future reports.

SIGAR's investigations, audits, and other work continue to have positive impacts on ongoing and planned reconstruction programs and agency operations. As of August 30, 2017, SIGAR had 239 ongoing investigations. At that time, the cumulative results of the SIGAR Investigations Directorate comprised 117 arrests, 152 criminal charges, 114 convictions, and 103 sentencing. The cumulative total from investigations-related criminal fines, restitutions, forfeitures, civil-settlements, savings, and recoveries to the government exceeds \$1.1 billion. Investigative work has also led to 866 referrals of companies and individuals for suspension or debarment to prevent them from receiving more U.S. contract awards; approximately 80 percent of these referrals have led to finalized suspensions, debarments, or administrative-compliance agreements.

SIGAR had made 769 recommendations in its 266 published audits, alert letters, and inspection reports as of August 2017. SIGAR has closed almost 70 percent of these recommendations as implemented, indicating that the subject agency has either adopted the recommendation or taken other appropriate action on the issue. These recommendations have, among other things, strengthened contract oversight, management, and compliance; assisted in building and sustaining Afghan government capacity; and improved accountability for on-budget support. SIGAR continues to monitor agency action on 139 open recommendations from 53 performance audit, inspection, and financial audit reports. SIGAR audits and inspections have resulted in recovering an estimated \$45 million and in identifying some \$950 million that could be put to better use, for a combined impact approaching \$1 billion.

SIGAR's audit, inspection, and quarterly reports, and special projects continue to be used by U.S. agencies, international partners, and the highest levels of the Afghan government to improve oversight and management of reconstruction efforts. President Ashraf Ghani and key advisors have met repeatedly with SIGAR personnel, and have expressed appreciation for SIGAR's oversight work. SIGAR's ongoing relationship with Afghan government leadership at the highest levels has borne tangible results. For example, SIGAR provided information to President Ghani regarding corruption in the contracting process for construction of portions of the Ring Road. This led to President Ghani terminating a \$99 million contract for the project.

General Comments on the GAO Draft Report

Although we support GAO's findings in the draft report, we disagree with the title, the highlights page, and the conclusions, all of which are misleading and contradicted by the evidence cited in the report. The title of the draft report—*Coordination Could Be Enhanced for Oversight of U.S. Operations in Afghanistan*—immediately suggests to the reader that there is a deficiency in coordination. Furthermore, the conclusion states that

Without documented agreement on roles and responsibilities and careful coordination, SIGAR and the DOD OIG are at increased risk of unnecessary duplication of efforts in meeting their respective reporting requirements and potentially increasing the burden on agencies providing information to them.⁴

The findings in the draft report simply do not substantiate either of these notions, which are in direct conflict with the text of the report. As discussed in the findings of the draft report, SIGAR and the OIGs of State, DOD, and USAID, along with GAO and the service audit agencies, regularly coordinate through formal mechanisms, including the Southwest Asia Joint Planning Group, the International Contract and Corruption Task Force, and

² Joint Explanatory Statement to the Consolidated Appropriations Act, 2017, Pub. L. No. 115-31 (2017).

³ SIGAR, *Reconstructing the Afghan National Defense and Security Forces: Lessons From the U.S. Experience in Afghanistan*, SIGAR-17-62-LL, September 21, 2017.

⁴ Draft report GAO-18-6, p. 38.

Appendix III: Comments from the Special Inspector General for Afghanistan Reconstruction

the vetting of notification letters, and informally through phone calls and email to ensure that there is coverage of all aspects of the reconstruction effort and to avoid duplication of effort. GAO's own analysis shows, remarkably, that there was no duplication in any of the objectives for the 180 audit, inspection, and evaluation reports, and special projects issued by the four different OIGs it reviewed.

The only potential concern raised in the draft GAO report was our and the DOD OIG's mandated quarterly reports on the reconstruction effort in Afghanistan and Operation Freedom's Sentinel, respectively, but we and DOD OIG addressed this issue over the past year. Shortly after CIGIE designated DOD OIG as the Lead IG for Operation Freedom's Sentinel in April 2015, both of our offices identified a risk that our data requests might be duplicative and place a burden on agencies responding to them. Recognizing this, and as described in the draft report, we took appropriate and coordinated actions to minimize any potential duplication while still fulfilling our mandated reporting requirements. For example, we started to share our data call questions and the responses received, and DOD OIG moved the issuance of its report back 2 weeks, all in an effort to reduce the burden on the agencies. Once again, the evidence demonstrates the success of our proactive actions. The GAO team did not identify any duplication in the approximately 200 questions included in our and the Lead IG's data calls for our fourth quarter FY 2016 reports, the final quarterly reports we issued during the scope of this audit.

We request that the GAO team revise the title and conclusions to accurately reflect the findings and evidence presented in the report. Not doing so, in our view, would result in a report that is misleading and unbalanced.

SIGAR's Response to GAO's Recommendation

In its draft report, GAO recommends that SIGAR, in collaboration with DOD OIG as Lead IG, define and document agreed-upon roles and responsibilities related to interagency collaboration with DOD OIG, including efforts to address overlapping areas included in their required reports and update them, as needed.

It is unclear to us what the intent of this recommendation is and what deficiency it seeks to address. Congress has already defined by statute both our and DOD OIG's, as the Lead IG, roles and responsibilities for coordinating our oversight work in Afghanistan to minimize or prevent duplication of effort, thus reducing the burden on the agencies we audit.⁵ These roles are also described in the *Comprehensive Oversight Plan for Overseas Contingency Operations* ("COP OCO"), which is publicly available on DOD OIG's website.⁶ To fulfill these roles and responsibilities, we have implemented several formal and informal coordination mechanisms, many of which are described in GAO's draft report and cited above.

SIGAR fully supports any recommendation that improves our agency's operations, but GAO's report does not present any evidence that duplication exists or any evidence that there is a risk of duplication in the future. As noted, GAO reviewed 180 audit, inspection, evaluation, and special project reports issued by the four IGs and found there was no duplication. In all my years in government, this is the best example of multi-agency coordination I have ever seen. A prime example of this coordination is the COP OCO mentioned above, a 200-page document containing the Joint Strategic Oversight Plan for Afghanistan, and a detailed description of the oversight projects for all four OIGs. In short, since there is no deficiency to address, there is no need for a recommendation. Nevertheless, we are willing to discuss with our colleagues at DOD, State, and USAID OIGs whether any additional writings are needed to further memorialize our existing coordination efforts.

⁵ National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, §1229(f)(4) and §842.

⁶ See DOD OIG, FY2017 Comprehensive Oversight Plan – Overseas Contingency Operations, October 2017, pp. 3, and 15-17, http://www.dodig.mil/IGInformation/archives/FY2017_COP_OCO_Oct2016.pdf, accessed on September 29, 2017. The COP OCO for FY2018 will be published in October 2017.

**Appendix III: Comments from the Special
Inspector General for Afghanistan
Reconstruction**

Through our work, we at SIGAR strive to support agencies' efforts to achieve U.S. reconstruction goals in Afghanistan, while providing Congress and taxpayers the information they need to hold the agencies accountable for the funds they spend. Since SIGAR's inception, we have worked with our colleagues at the DOD, State, and USAID OIGs to ensure that there is robust, effective, and efficient oversight of U.S. efforts in Afghanistan, and we will continue to work with them to minimize and prevent duplication of effort.

Should you have any questions or comments on this letter, please contact my Assistant Inspector General for Audits and Inspections, Ms. Gabriele Tonsil, at 703-545-6090 or gabriele.a.tonsil.civ@mail.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'John F. Sopko', with a long horizontal flourish extending to the right.

John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

Appendix IV: Comments from the U.S. Agency for International Development Office of Inspector General



Office of Inspector General

OCT 4 2017

Ms. Elizabeth Martinez
Assistant Director, Financial Management and Assurance
U.S. Government Accountability Office
441 G St., NW
Washington, DC 20548

Dear Ms. Martinez:

We appreciate the opportunity to comment on the Government Accountability Office's (GAO) draft report "Inspectors General: Coordination Could Be Enhanced for Oversight of U.S. Operations in Afghanistan." The U.S. Agency for International Development (USAID) Office of Inspector General (OIG) takes seriously its responsibility to coordinate with the Special Inspector General for Afghanistan Reconstruction (SIGAR) and the OIGs at the Departments of State (State) and Defense (DOD) to provide effective oversight in Afghanistan while minimizing the burden on the agencies we oversee. We all share the same goal: enhancing our agencies' ability to efficiently and effectively carry out their important missions in a country that is central to U.S. national security.

Therefore, we were pleased that the report found that the OIGs have prevented duplication by coordinating their efforts. As noted in the report, GAO found no duplicate objectives among the work products issued by the OIGs. While we agree that your draft report appropriately described these positive findings, the title implies a contradictory message that could lead a reader to conclude that coordination has been less than satisfactory. Specifically, the title is inconsistent with the report's major findings and conclusion, which states that "SIGAR and the OIGs at DOD, State, and USAID have been coordinating their oversight activities for many years and established key mechanisms to facilitate ongoing collaboration." We ask that you clarify the title to more accurately reflect the main finding and related recommendations—a need for documented agreement on roles and responsibilities between SIGAR and DOD.

Although USAID does not have any programs falling under Operation Freedom's Sentinel (OFS) and USAID OIG is not officially triggered under the Lead IG framework for Afghanistan, we conduct robust oversight of USAID's development programs in Afghanistan under the authority of the Inspector General Act. In addition, USAID OIG has been an active participant in interagency oversight activities in Afghanistan with our fellow OIGs. My key deputies and I regularly engage with our counterparts at State and DOD OIGs through interagency planning sessions, regular coordination calls and meetings, production of quarterly reports, and joint site visits. For example, in January 2017, I traveled to Afghanistan, Iraq, and

U.S. Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
<http://oig.usaid.gov/>

-2-

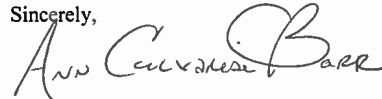
Jordan with the State Department Inspector General and Acting Defense Department Inspector General to assess our agencies' efforts to promote U.S. strategic interests in those countries and prevent fraud, waste, and abuse in related programs.

USAID OIG focuses its resources on those engagements with the broadest impact. On the audit side, the recommendations stemming from our recent report on the Afghanistan Reconstruction Trust Fund (ARTF) will result in substantial improvements not only in how USAID manages its investment in ARTF, but also in how USAID monitors and reports on its awards with public international organizations worldwide. Our current on-going audits have the potential to deliver comparable results. Key engagements are an audit of the New Development Partnership—looking at the sufficiency of USAID's controls for verifying payments in incentivized direct assistance to the Afghan Government—and a follow-up audit of USAID's use of its multi-tiered monitoring strategy to oversee development projects despite travel restrictions due to nonpermissive settings.

As described in your report, USAID OIG investigators continue to work closely with their fellow OIG and law enforcement colleagues to safeguard taxpayer funds and protect vital American interests. The recent Council of the Inspectors General on Integrity and Efficiency awards earned by two USAID OIG agents for their key roles in thwarting a terrorist funding scheme epitomizes the critical work and professionalism displayed by members of the oversight community in Afghanistan. The USAID OIG Office of Investigations closed 28 cases related to Afghanistan during the period of January 1, 2015 to September 30, 2016, the period covered in the report.

We will continue to work diligently with our fellow accountability partners to coordinate where appropriate and avoid duplication of effort in other areas. If you need anything else, please feel free to contact Deputy Inspector General, Justin H. Brown, at (202) 712-1150.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Calvaresi Barr". The signature is fluid and cursive, with the first name "Ann" being particularly prominent.

Ann Calvaresi Barr
Inspector General

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Beryl H. Davis, (202) 512-2623 or davisbh@gao.gov

Staff Acknowledgments

In addition to the contact named above, Elizabeth Martinez (Assistant Director), Francine DeVecchio, Jason Kirwan, Tram Le, Lisa Rowland, Shelia Skinner, and Taya R. Tasse made key contributions to this report.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<http://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <http://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <http://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [LinkedIn](#), [Twitter](#), and [YouTube](#). Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#). Visit GAO on the web at www.gao.gov and read [The Watchblog](#).

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: <http://www.gao.gov/fraudnet/fraudnet.htm>

E-mail: fraudnet@gao.gov

Automated answering system: (800) 424-5454 or (202) 512-7470

Congressional Relations

Katherine Siggerud, Managing Director, siggerudk@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707 U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548



Please Print on Recycled Paper.