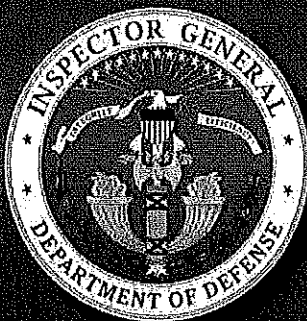


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Report No. DODIG-2013-030 December 7, 2012

Inspector General

United States
Department of Defense



Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces

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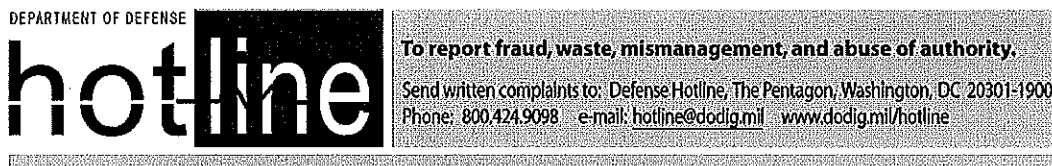
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Acronyms and Abbreviations

Army G2	Army Deputy Chief of Staff for Intelligence G2
ACOR	Assistant Contracting Officer's Representative
BATS	Biometric Automated Toolset
CI	Counterintelligence
FAR	Federal Acquisition Regulation
FP	Force Protection
INSCOM	U.S. Army Intelligence and Security Command
KBC	Kabul Base Cluster
LN	Local National
LNL	Local National Linguists
LOGCAP	Logistics Civil Augmentation Program
MEP	Mission Essential Personnel
MFR	Memorandum for Record
OCI	Organizational Conflict of Interest
OCONUS	Outside the Continental United States
TLM	Theater Linguist Manager
USFOR-A	U.S. Forces-Afghanistan



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

December 7, 2012

MEMORANDUM FOR CHIEF OF STAFF, U.S. ARMY
COMMANDING GENERAL, U.S. ARMY INTELLIGENCE
AND SECURITY COMMAND
COMMANDER, U.S. CENTRAL COMMAND
COMMANDER, U.S. FORCES-AFGHANISTAN
DIRECTOR, JOINT STAFF

SUBJECT: Counterintelligence Screening Needed to Reduce Security Threat That
Unscreened Local National Linguists Pose to U.S. Forces
(Report No. DODIG-2013-030)

We are providing this report for your information and use. For the linguist contract W911W4-07-D-0010, valued at \$1.46 billion, only 656 of 4,310 local nationals hired as linguists for U.S. forces in Afghanistan, as of October 25, 2010, received counterintelligence screening. As a result, there is an increased risk that local nationals hired pose a security threat to U.S. and coalition forces in Afghanistan. We considered management comments on a draft of this report when preparing the final report.

Comments from the Commander, U.S. Army Intelligence and Security Command and the Commander, U.S. Forces-Afghanistan, conformed to the requirements of DoD Directive 7650.3 and left no unresolved issues.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-8901 (DSN 664-8901).

Daniel R. Blair
Deputy Inspector General
for Auditing

cc:
Under Secretary of Defense for Policy
Under Secretary of Defense for Intelligence

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Results in Brief: Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces

What We Did

This is the third in a series of audits conducted in response to a January 2010 shooting incident in Afghanistan, involving a contractor linguist and U.S. forces. Our objective was to determine whether U.S. Army Intelligence and Security Command (INSCOM) officials effectively implemented the security requirements for the linguist contract W911W4-07-D-0010, valued at \$1.46 billion. This report addresses the counterintelligence (CI) screening of local nationals (LNs) hired as linguists in Afghanistan.

What We Found

INSCOM officials did not effectively implement the security requirements for linguist contract W911W4-07-D-0010 in Afghanistan. Specifically, INSCOM did not ensure that Army policy requirements for screening linguists were incorporated into the contract in a timely manner. This occurred because INSCOM officials did not ensure the linguist contract included the most updated requirements for screening LN linguists. As a result, INSCOM officials did not require CI screening for 3,654 of 4,310 LN linguists in Afghanistan hired by Mission Essential Personnel (MEP) in calendar year (CY) 2009 and CY 2010. Furthermore, there is an increased risk that LNs hired as linguists by MEP, who were not CI screened, may pose a threat to the security of U.S. and coalition forces in Afghanistan.

~~(FOUO)~~ Additionally, INSCOM officials awarded MEP a contract to conduct CI screening on LN linguists hired under the MEP managed linguist contract, which is an organizational conflict of interest. INSCOM officials recognized the organizational conflict of interest and MEP developed a plan that only U.S. Government

~~(FOUO)~~ officials could approve CI screening results for LNs; however, the mitigation plan was not implemented. This occurred because INSCOM contracting officials did not conduct oversight of the plan to ensure that the Government, not MEP, approved the results of the CI screening. As a result, INSCOM has no assurance that CI screening used to determine if LN linguists constituted a security threat to U.S. and coalition forces and facilities was objective and thorough leaving the forces at risk for potential harm.

What We Recommend

We recommend that the Commander, Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan (USFOR-A) identify LNs working with U.S. forces who did not complete CI screening, and conduct CI screening for those individuals. Further, that the Commander, Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan, appoint a Government representative to approve the results of CI screenings in Afghanistan, and implement the mitigation plan to eliminate the organizational conflict of interest.

Management Comments and Our Response

The comments from the Chief of Staff, INSCOM, the Director, Theater Linguist Office, USFOR-A were responsive to the recommendations, and no additional comments are required. Please see the recommendations table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Commander, U.S. Army Intelligence and Security Command		A., B.1., and B.2.
Commander, U.S. Forces- Afghanistan		A., B.1., and B.2.

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Introduction

Objective

Our objective was to determine whether U.S. Army Intelligence and Security Command (INSCOM) officials effectively implemented the security requirements for the linguist contract W911W4-07-D-0010, valued at \$1.46 billion. This report addresses the counterintelligence (CI) screening of local nationals (LNs) hired as linguists in Afghanistan and is the third in a series of audits conducted in response to a January 2010 shooting incident in Afghanistan involving a contractor linguist and U.S. forces. See Appendix A for a discussion of our scope and methodology and prior coverage related to the objective.

Background

The report is pursuant to the requirements for Public Law 100-181, "The National Defense Authorization Act for Fiscal Year 2008," section 842, "Investigation of Waste, Fraud, and Abuse in Wartime Contracts and Contracting Process in Iraq and Afghanistan," December 6, 2007. Section 842 requires thorough investigation and auditing to identify potential waste, fraud, and abuse in the performance of DoD contracts, subcontracts, and task and delivery orders for the logistical support of coalition forces in Iraq and Afghanistan. Further, section 842 requires thorough auditing of Federal agency contracts, subcontracts, and task and delivery orders for the performance of security and reconstruction functions in Iraq and Afghanistan.

On September 7, 2007, INSCOM personnel awarded contract W911W4-07-D-0010 to Mission Essential Personnel (MEP) for linguist support, valued at \$1.46 billion. The contract provided for linguist services that will enable U.S. Forces to communicate with the local populace, gather information for Force Protection (FP), and interact with other foreign military units. The contract required performance-based services for the rapid recruitment and deployment of foreign language interpretation and translation services in support of the U.S. Army; the U.S. Army as executive agent for DoD translator and interpreter services. The contract also required interpreters and translators to accompany military units during their missions.

Army Organizational Responsibilities

~~(FOUO)~~ DoD designated the Secretary of the Army as the executive agent for contract foreign language support in DoD Directive 5160.41E, "Defense Language Program," October 21, 2005. The Secretary of the Army, in a memorandum titled "Delegation of Authority for DoD Executive Agent for Contract Linguists," March 1, 2006, delegated that responsibility to the Army Deputy Chief of Staff for Intelligence G2 (Army G2). Additionally, Army G2 is responsible for issuing policy and providing oversight of contract linguists. Army G2 delegated the CI and security screening requirements for outside the continental United States (OCONUS) to the U.S. Army CI commanders.

Contract Award Organization

INSCOM is an Army command that conducts intelligence, security, and information operations. INSCOM personnel awarded and managed contract W911W4-07-D-0010 for linguist support, and two other contracts for CI and FP screening. On September 28, 2009, INSCOM personnel awarded contract W911W4-09-D-0103 to MEP for CI services to U.S. Forces-Afghanistan (USFOR-A), valued at \$78 million. On September 24, 2010, U.S. Army Contracting Command awarded contract W52P1J-10-D-0107 to MEP for CI services in Afghanistan.

U.S. Army Policy for Contract Linguists

~~(FOUO)~~ On September 7, 2007, INSCOM awarded contract no. W911W4-07-D-0010 for contract linguists with a period of performance through November 2, 2010. INSCOM extended the contract on September 24, 2010. When awarded, the linguists' contract referenced an April 22, 1998, policy that only requires an investigation for non-U.S. citizens employed as contract linguists. INSCOM oversight officials in Afghanistan interpreted this requirement to mean a FP security screening, not a CI security screening. See Appendix B for screening requirements. Later, the contracting officer modified the statement of work for the contract and included a reference to the three memoranda (April 22, 1998; May 15, 2008; and September 20, 2010) to address the inherent security risks associated with contractor personnel who provide foreign language translation and interpretation services. The memoranda applied to all U.S. Army activities that use INSCOM contracts to acquire foreign language translation and interpretation services.

~~(FOUO)~~ U.S. Army Policy Memorandum, "Army Counterintelligence and Security Support to Contract Linguist Acquisition," April 22, 1998 (1998 memorandum), requires Army Commands that hire linguists outside the U.S. to "conduct any investigation deemed appropriate for non-U.S. citizens employed as contract linguists." U.S. Army Policy Memorandum, "Contract Linguist Counterintelligence and Security Screening Policy," May 15, 2008, (2008 memorandum), states that all contract linguist applicants must meet security eligibility requirements as follows: "[c]ategory one linguists hired OCONUS as LNs and third-country nationals to support military operations must undergo CI screening by in-theater screening teams using the CI screening questionnaire published by the Army G2." The 2008 memorandum was applicable to LNs screened from May 15, 2008, through September 20, 2011.

~~(FOUO)~~ Additionally, the policy states that "[c]ontract [MEP] CI Screeners may be used as long as the company providing screeners does not also have an ownership, subsidiary, or contractual relationship with companies that provide linguists to fill U.S. Government requirements."

~~(FOUO)~~ In 2010, the Army issued a memorandum, "Contract Linguist Personnel Security Investigation and Counterintelligence-Focused Security Review Program Policy," September 20, 2010 (2010 memorandum), which removed the 2008 memorandum's requirement to CI screen LNs hired OCONUS and delegated the responsibility down to local commanders.

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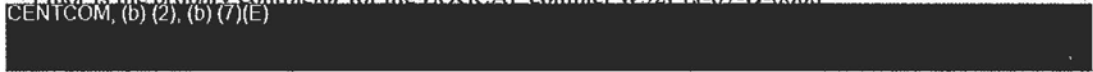
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¹ Elmor is the primary contractor for the LOGCAP contract W52P1J-07-D-0008
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LOGCAP is a contract using task orders to provide support to U.S. military personnel in Afghanistan.

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Review of Internal Controls

~~(FOUO)~~ DoD Instruction 5010.40, "Managers' Internal Control (MICP) Program Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses for INSCOM, such as an organizational conflict of interest (OCI) when they awarded the CI screening contract to MEP, the same company hiring the linguists that required screening. INSCOM officials did not implement the plan to mitigate the OCI. In addition, for the linguist contract W911W4-07-D-0010, INSCOM officials did not provide adequate contract oversight by ensuring that all LNs hired as linguists received CI screening. INSCOM officials should have ensured that only U.S. Government officials approved the results of CI screening, not MEP CI screeners. We will provide a copy of the report to the senior official responsible for internal controls in INSCOM.

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Finding A. Adequate Security Screening Needed to Reduce the Threat That Unscreened Linguists May Pose to U.S. Forces

INSCOM officials did not effectively implement the security requirements for linguist contract W911W4-07-D-0010 in Afghanistan. Specifically, INSCOM did not ensure that Army policy requirements for screening linguists were incorporated into the contract in a timely manner. This occurred because INSCOM officials did not ensure the linguist contract included the most updated requirements for screening LN linguists. As a result, DoD did not conduct CI screening for 3,654 of 4,310 LN linguists in Afghanistan hired by MEP for CY 2009 and CY 2010. Furthermore, there is increased risk that LNs hired as linguists by MEP, who were not CI screened, may pose a threat to the security of U.S. and coalition forces operating in Afghanistan.

INSCOM Did Not Effectively Implement Security Requirements for Screening Linguists in Afghanistan

INSCOM officials did not effectively implement the security requirements for the linguist contract W911W4-07-D-0010 in Afghanistan. Specifically, INSCOM did not ensure that Army policy requirements for screening linguists were incorporated into the contract in a timely manner. INSCOM personnel awarded contract W911W4-07-D-0010

INSCOM officials should have modified contract W911W4-07-D-0010 to require MEP to complete CI screening for LNs.

on September 7, 2007. On May 15, 2008, Army G2 officials issued a memorandum that required all LNs hired as linguists to receive CI screening. When Army G2 issued the 2008 memorandum, INSCOM officials should have modified contract W911W4-07-D-0010 to require MEP to complete CI screening for LNs. INSCOM officials later modified the contract on June 22, 2010, almost 2 years after the screening requirements changed for LNs hired as linguists. The delay resulted in LNs receiving FP⁴ screening, instead of CI screening. Subsequently, the 2008 screening requirements changed when Army G2 issued a 2010 memorandum

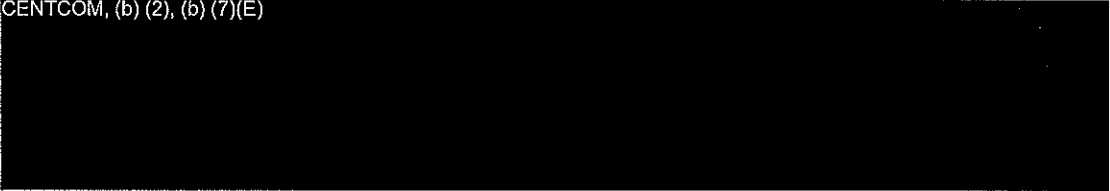
⁴ FP Screening is a basic security screening process for escorted entry while on U.S. Forces' installations in Afghanistan.

2010 Memorandum Removed Requirements for CI Screening of Linguists

In 2010, Army G2 issued a memorandum that changed the screening requirements in the 2008 memorandum. Specifically, the 2010 memorandum no longer included the security requirement to perform CI screening of LNs hired under the MEP linguist contract. The 2008 memorandum was the only consistent guidance in Afghanistan for screening LN linguists that would determine whether they may pose any threat to U.S. and coalition forces. Because Army G2 issued the 2010 memorandum that exempted LN linguists from mandatory CI screening, we reviewed the screening policy for the Kabul Base Cluster (KBC)⁵ in Afghanistan, as it was the only policy in effect that required CI screening in Afghanistan.

Implementation of CI Screening in Afghanistan

~~(FOUO)~~ The local KBC commander's policy and the KBC security teams focused mainly on day laborers access using FP screening, which is a less suitable security screening for the mission requirements of the LN linguists hired under the MEP contract. CENTCOM, (b) (2), (b) (7)(E)

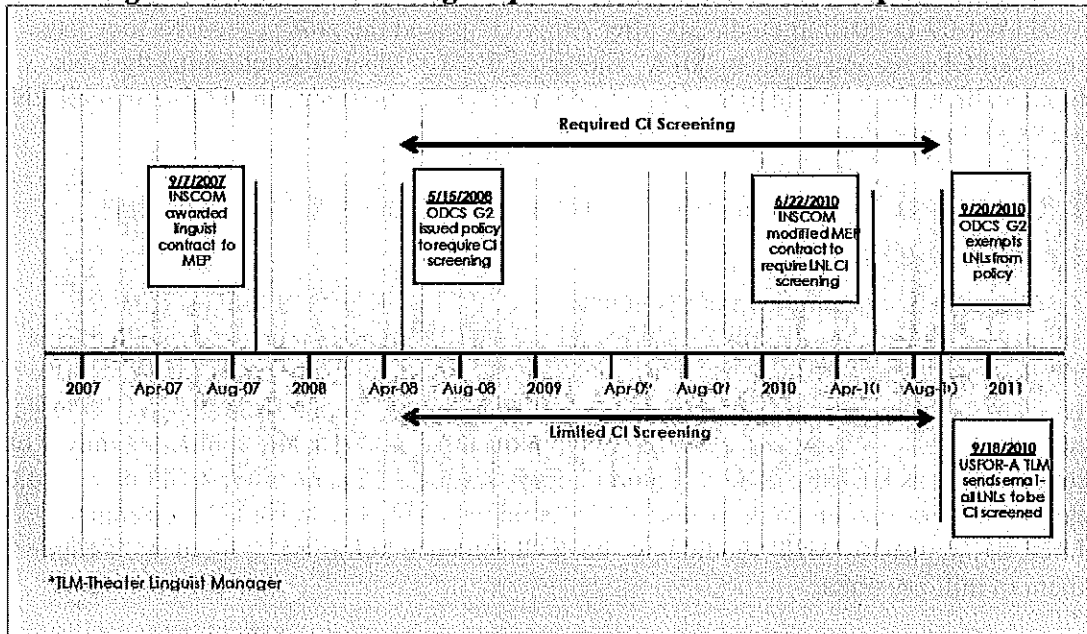


The contracting officer's representative in Afghanistan for contract W911W4-09-D-0103 expressed concern to the Theater Linguist Manager (TLM) that LNs should be required to undergo CI screening. Additionally, USFOR-A J2 officials expressed that CI screening was better suited than FP screening to identify whether the LNs posed a security threat to U.S. and coalition forces. In response, the TLM sent an e-mail to USFOR-A and MEP officials on September 18, 2010, stating that all LNs hired as linguists in Afghanistan would continue to be CI screened. Although the e-mail was not formal policy, the TLM's instruction for 100 percent CI screening of LNs hired as linguists provided a continual requirement for CI screening in Afghanistan. Although policy and instructions required CI screening for LNs hired as linguists continually, beginning with the 2008 memorandum, the amount of CI screening actually performed in CY 2009 and CY 2010 was limited. See Appendix B for more information on CI and FP screening processes.

⁵ KBC includes the installations called Alamo, Black Horse, Bala Hissar, Dubbs, Eggers, Green, International Security Assistance Force, Julien, North Kaia, NKC, and Phoenix.

The following figure demonstrates the continuing requirement that LNs in Afghanistan receive CI screening.

Figure. Dates CI Screening Required for LNs and Dates Implemented



CI Screening Conducted From CY 2009 Through CY 2010

~~(FOUO)~~ INSCOM oversight officials provided a report of the total LNs that MEP recruited and the LNs that received CI screening for 2009 and 2010. According to the INSCOM report, only 656 of the 4,310 LNs hired between 2009 and 2010 received CI screening, leaving 3,654 LNs who were not CI screened.

Table. LNs Hired as Linguists and CI Screened in 2009 and 2010
(as of October 25, 2010)

Year	Total Hired	Total CI Screened
2010	2,155	656
2009	2,155	0
Total	4,310	656

Source: INSCOM ACORs

Delay in Updating Contract Security Requirements Negatively Impacted Screening in Afghanistan

~~(FOUO)~~ INSCOM officials did not incorporate Army policy requirements for screening linguists into the contract in a timely manner. This occurred because INSCOM officials interpreted requirements from a 2008 memorandum that required CI screening for LN linguists to mean FP screening and did not modify the contract to require CI screening.

~~(FOUO)~~ According to INSCOM assistant contracting officer's representatives (ACORs) and MEP officials, LNs received FP screening, instead of CI screening, because the contract required only FP screening. If INSCOM had implemented the security requirements of the 2008 memorandum in a timely manner by modifying contract W911W4-07-D-0010 immediately after Army G2 issued the policy, the LNs may have received CI screening prior to 2010. Therefore, INSCOM should determine the LNs hired as linguists in Afghanistan that did not receive CI screening and ensure that all LNs receive CI screening.

Increased Security Risk From Limited CI Screening of Linguists

As a result, CI screening was not conducted for 3,654 of 4,310 LN linguists in Afghanistan hired by MEP in CY 2009 and CY 2010. There is increased risk that LNs hired as linguists by MEP, who were not CI screened, may pose a threat to the security of U.S. and coalition forces operating in Afghanistan. For example, we reviewed a sample of 422 linguists from April 1, 2010, through November 2, 2010, and found that only 9 of the 48 linguists hired by MEP at Camp Phoenix received CI screening. USFOR-A could not provide documents to determine if the remaining 39 LNs received CI screening. LNs hired as linguists by MEP should have been CI screened before MEP hired and assigned them to military units.

CI screening is more effective than FP screening to identify potential security threats posed by LNs to U.S. and coalition forces. In addition, the 2008 memorandum required that all LNs receive CI screening before MEP could hire them to work as linguists. Therefore, not performing CI screening for all LN linguists increases the risk that individuals can pose to U.S. and coalition forces.

Recommendations, Management Comments, and Our Response

A. We recommend that the Commander, U.S. Army Intelligence and Security Command and the Commander, U.S. Forces-Afghanistan, conduct a review to identify the local national linguists working on contract no. W911W4-07-D-0010 in Afghanistan that have not completed counterintelligence screening, and schedule and conduct a counterintelligence screening for each linguist.

U.S. Army Intelligence and Security Command Comments

The Chief of Staff, U.S. Army Intelligence and Security Command, responding on behalf of the Commander, U.S. Army Intelligence and Security Command, agreed with the recommendation. The Chief of Staff stated that ongoing efforts to resolve issues such as revising the security vetting procedures in accordance with International Security Assistance Force Standard Operating Procedure 233 to require CI screening of all local national linguists (LNL). The Chief of Staff stated that the revised security vetting procedures will include requiring CI screening of all LNL. The command's revisions for

the security vetting procedures will include requiring CI screening of all local national linguists every 6 to 12 months.

Our Response

Comments from the Chief of Staff, U.S. Army Intelligence and Security Command were responsive, and no additional comments are required.

U.S. Forces-Afghanistan Comments

The Director, Theater Linguist Office, U.S. Forces-Afghanistan, responding on behalf of the Commander, U.S. Forces-Afghanistan, agreed with the recommendation. The Director, stated U.S. Forces-Afghanistan established a Theater Linguist Office in February 2011 to ensure all linguist requirements are fulfilled in the Combined Joint Operations Area-Afghanistan area of responsibility. The U.S. Forces-Afghanistan Theater Linguist Office partnered with the International Security Assistance Force Intelligence Division to verify all 5,052 LNL completed CI screening requirements. LNLs are required to pass CI screening before being hired and enroll in the Biometric Automated Toolset in accordance with International Security Assistance Force Standard Operating Procedure 233. A Theater Linguist Office CI adjudicator will ensure that LNL completed CI screening requirements.

Our Response

Comments from the Director, Theater Linguist Office, U.S. Forces-Afghanistan were responsive, and no additional comments are required.

Finding B. The Contractor Approved Its Own Work, Which Caused an Organizational Conflict of Interest

MEP employees conducted CI screening of other MEP employees hired as linguists in Afghanistan and approved their own results of the screening, resulting in an OCI. INSCOM officials awarded two contracts to MEP: one contract to hire linguists and the other contract to conduct CI screening. INSCOM officials determined that an OCI existed after awarding the contract to conduct CI screening and MEP developed a plan to mitigate the conflict. However, INSCOM did not implement the mitigation plan. This occurred because INSCOM contracting officials did not conduct oversight of the plan to ensure that the Government, not MEP, approved the results of the CI screening. As a result, INSCOM has no assurance that CI screening used to determine if LN linguists constituted a security threat to U.S. and coalition forces and facilities was objective and thorough, leaving the forces at risk for potential harm.

Definition of Organizational Conflict of Interest and Contracting Officer Responsibilities

According to Federal Acquisition Regulation (FAR) Part 2.101, "Definitions,"

[o]rganizational conflict of interest means that because of other activities or relationships with other persons, a person is unable or potentially unable to render impartial assistance or advice to the government, or the person's objectivity in performing the contract work is or might be otherwise impaired, or a person has an unfair competitive advantage.

FAR Part 9.504, "Contracting Officer Responsibilities," states that contracting officers shall analyze planned acquisitions to:

- a. Identify and evaluate potential organizational conflicts of interest as early in the acquisition process as possible; and
- b. Void, neutralize, or mitigate significant potential conflicts before contract award.

Plan to Mitigate the Conflict of Interest Using Government Oversight

~~(FOUO)~~ MEP employees conducted CI screening of other MEP employees hired as linguists in Afghanistan and approved their own results of the screening, resulting in an OCI. INSCOM officials awarded two contracts to MEP: one contract W911W4-07-D-0010 to hire linguists and the other contract W911W4-09-D-0103 to conduct CI screening. INSCOM officials determined that there was an OCI before awarding a contract to MEP in September 2009 for CI screening. INSCOM requested MEP develop a mitigation plan, which was approved on March 3, 2010, to address

~~(FOUO)~~ the OCI. MEP officials stated in the OCI mitigation plan that the requirements of the plan would be sufficient to resolve the OCI.

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~~(FOUO)~~ According to the mitigation plan, neither the first nor the second reports would draw conclusions and recommendations on the retention, hiring, or threat posed by the LNs. MEP would send the MFRs to the office responsible for issuing badges on the local installations if the MFRs had no negative CI information. If the MFRs had CI exploitable information, MEP would send the information electronically through the operations control team to a J2⁶ database. The local area J2 would make the approval for hiring the LNs as linguists.

~~(FOUO)~~ The date of the MEP OCI Mitigation Plan was March 3, 2010, which occurred after INSCOM personnel awarded the security-screening contract to MEP for CI screening. FAR 9.504 requires that the contracting officer mitigate any OCI before contract award. However, INSCOM personnel chose to mitigate the OCI after award using Government oversight of CI screening to prevent a conflict of interest.

Contractor Approved Its Own Work

~~(FOUO)~~ MEP personnel performed and approved CI screening for 656 LNs that received CI screening when MEP hired them as linguists in 2010. The MEP CI screeners conducted face-to-face interviews

~~(FOUO)~~ When MEP officials approved their own work, they created an OCI that INSCOM officials should have identified and mitigated.

INSCOM, (b) (7)(E)

MEP CI screeners recorded the results of the CI screenings in MFRs. The MFRs contained information to allow the U.S. Government to make recommendations regarding whether MEP should hire the LNs

⁶ According to Joint Publication 1-02, "Department of Defense Dictionary of Military and Associated Terms," November 8, 2010, J2 is the staff element of the intelligence directorate of a joint staff that combines and represents the principal authority for CI and human intelligence support.

~~(FOUO)~~ for employment or not. However, a review of the MFRs showed that the Government did not review or make recommendations stating whether the LNs passed the CI screenings. MEP CI screeners made determinations regarding whether or not the LNs posed a security risk to U.S. forces. In accordance with FAR Part 2.101 and FAR Part 9.504 requirements, when MEP officials approved their own work, they created an OCI that INSCOM officials should have identified and mitigated.

Effective Oversight of Screening Needed to Reduce Conflict of Interest

INSCOM contracting officials did not have required oversight functions in place to mitigate the OCI. The oversight functions implemented to mitigate the OCI required that CI screeners refrain from making conclusions regarding the threat that LNs pose to U.S. coalition forces and the suitability of LNs for employment. However, MEP CI screeners performed CI screenings on LNs at Camp Phoenix and signed the MFRs to approve the results of the screening. Additionally, the MEP CI screeners made statements that the LN passed the CI screening using MFRs. In addition, the MFRs did not contain any evidence that U.S. Government officials reviewed and approved the MFRs. When asked for documentation or proof of their oversight of the MEP security screening contract W911W4-09-D-0103, officials from INSCOM and USFOR-A J2 could not provide evidence that they reviewed and approved the results of the CI screenings.

INSCOM contracting officials acknowledged that they were aware of the lapse in oversight of the CI screening functions in Afghanistan, but they did not take action to ensure that there was adequate oversight of the CI screening functions. Specifically, INSCOM believed the mitigation plan resolved the issue; however, INSCOM did not carry out oversight responsibilities detailed in the mitigation plan.

INSCOM contracting personnel later provided a document called a "Determination and Findings of Nonpersonal and Non-Inherently Governmental Services" that referred to the OCI. An INSCOM contracting official stated, "the controls on contractor performance have been put in place to prevent the contractor from improperly exercising the authority that is reserved to the government." Although the INSCOM contracting official stated that controls were in place during contract performance, INSCOM could have prevented an OCI if they provided adequate oversight during the CI screening of LNL.

In addition, the contracting officer did not sign and date the determination and finding. Subsequently, an INSCOM contracting official stated that he signed the determination and finding in June 2010, which was 9 months after INSCOM personnel awarded contract W911W4-09-D-0103 in September 2009. INSCOM's planning and oversight was not adequate to address or mitigate the OCI. INSCOM personnel responsible for oversight did not ensure that government personnel approve the results of CI screening. In addition, INSCOM contracting personnel did not ensure that the OCI, that occurred by

awarding a contract for MEP to screen its own employees, was mitigated. Therefore, INSCOM and USFOR-A should appoint government personnel to review and approve CI screening conducted by contractors. The commands should adhere to the procedures defined in plans to mitigate OCIs.

Conflict of Interest Was Not in Compliance With FAR

INSCOM officials did not manage and administer the CI screening contract in accordance with FAR guidance. FAR 9.504 states that contracting officials must identify and take action to avoid OCIs in contracting for services early in the acquisition process. INSCOM contracting officials recognized that awarding a contract to MEP for screening of LNs hired under another MEP contract is an OCI. INSCOM officials received an OCI Mitigation Plan from the contractor outlining steps to remove the OCI. However, no evidence exists to show that MEP and INSCOM officials completed the requirements of the OCI mitigation plan.

Conclusion

INSCOM officials awarded a contract for MEP to screen its employees. However, there was a lack of Government oversight, as required in the OCI mitigation plan, to ensure that the contractor's work met standards required by the FAR. In addition, INSCOM officials were aware of the lapse in oversight and should have taken steps to implement the mitigation plan. This resulted in the contractor approving its own work, which could impair contractor employees' decisions regarding whether the LNs hired as linguist met applicable security requirements. There is an increased risk that LNs hired as linguists do not meet security requirements and are a threat to U.S. and coalition forces.

Recommendation, Management Comments, and Our Response

B.1. We recommend that Commander, U.S. Army Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan appoint a Government representative to approve the results of all counterintelligence screenings completed by MEP counterintelligence screeners to mitigate conflicts of interest.

U.S. Army Intelligence and Security Command Comments

The Chief of Staff, U.S. Army Intelligence and Security Command, responding on behalf of the Commander, U.S. Army Intelligence and Security Command, agreed with the recommendation. U.S. Forces-Afghanistan appointed an Army civilian CI adjudicator to approve CI screening results.

Our Response

Comments from the Chief of Staff, U.S. Army Intelligence and Security Command were responsive, and no additional comments are required.

U.S. Forces-Afghanistan Comments

The Director, Theater Linguist Office, U.S. Forces-Afghanistan agreed with the recommendation. U.S. Forces-Afghanistan hired a CI Adjudicator to partner with U.S. military CI teams to provide Government oversight for CI screening of LNL. The CI adjudicator duties include keeping track of Memorandums for Record of completed CI screenings of LNL.

Our Response

Comments from the Director, Theater Linguist Office, U.S. Forces-Afghanistan were responsive, and no additional comments are required.

B.2. We recommend that the Commander, U.S. Army Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan, assess mitigation plans to determine what measures are necessary to eliminate the organizational conflicts of interest in screening linguists in Afghanistan.

U.S. Army Intelligence and Security Command Comments

The Chief of Staff, U.S. Army Intelligence and Security Command, responding on behalf of the Commander, U.S. Army Intelligence and Security Command, agreed with the recommendation. The Chief of Staff stated that the U.S. Forces-Afghanistan contract for CI screening support was restructured to mitigate organizational conflict of interest. The restructuring of the contract will have a requirement prevent contractors from CI screening local nationals hired under other contracts awarded to their parent companies.

Our Response

Comments from the Chief of Staff, U.S. Army Intelligence and Security Command were responsive, and no additional comments are required.

U.S. Forces-Afghanistan Comments

The Director, Theater Linguist Office, U.S. Forces Afghanistan, responding on behalf of the Commander, U.S. Forces-Afghanistan, agreed with the recommendation. The Commander, U.S. Army Intelligence and Security Command and the Commander, U.S. Forces-Afghanistan, assessed mitigation plans to determine what measures are necessary to eliminate the organizational conflicts of interest in screening linguists in Afghanistan. MEP does not conduct any CI screening of any MEP contract linguists. A Theater Linguist Office CI adjudicator provides oversight of CI screening results tests.

Our Response

Comments from the Director, Theater Linguist Office, U.S. Forces-Afghanistan were responsive, and no additional comments are required.

Appendix A. Scope and Methodology

We conducted this performance audit from June 2010 through September 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

During the fieldwork stage of the audit, we contacted, visited, or interviewed officials from the following organizations:

- USFOR-A
- MEP
- INSCOM

We reviewed contract W911W4-07-D-0010 for linguist support. We reviewed contract W911W4-09-D-0103 and W52P1J-10-D-0107 for CI screening. We reviewed contract W52P1J-07-D-0008 for FP screening.

We reviewed FAR Part 2.101 for the definition of OCI and FAR Part 9.504 for an understanding of the contracting officer's responsibilities for planned acquisitions. We reviewed the DoD Directive 5160-41E, which designated the Secretary of the Army as Executive Agent for the Defense Language Institute Foreign Language Center and Executive Agent for contract foreign language support to the DoD Components.

We reviewed and analyzed three memoranda issued by the Army to determine the Army's policy for screening LN contract linguists. We reviewed a 1998 memorandum, a 2008 memorandum, and a 2010 memorandum that established standards for CI and FP security screening of LN contract linguists. In addition, we reviewed the KBC security regulations to determine requirements for LNs to enter the military installations that are part of the KBC.

We reviewed the contract statement of work and three Army policy memoranda to determine the screening process for LN contract linguists. We then visited each of the above organizations to observe the screening process. We then collected documentation from MEP, INSCOM, and USFOR-A officials to determine whether U.S. Government officials effectively implemented the security requirements.

We selected a nonstatistical sample of 48 Afghan LNs hired as linguists under contract W911W4-07-D0010 from April 1, 2010, through November 2, 2010. We selected the sample from a population of 422 LNs hired by MEP that went through the testing and screening process at Camp Phoenix, Afghanistan. We used the sample to determine whether the LNs had CI screening before MEP hired and sent the LNs to work as linguist with U.S. forces. We verified that the LNs from our sample went through CI screening before MEP hired them by requesting and reviewing the CI screening

records from the USFOR-A J2. Additionally, we obtained the number of linguists hired and CI screened during CY 2009 and CY 2010 from INSCOM officials to determine whether all linguists hired received CI screening. We also spoke with representatives of INSCOM, USFOR-A, and MEP to obtain their views related to CI screening requirements.

We observed the CI screening of five LNs during site visits to Camp Phoenix. In addition, we obtained the CI screening results and other documentation to determine whether the U.S. Government officials, not MEP, reviewed and approved the CI screening results.

Use of Computer-Processed Data

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

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO), the Department of Defense Inspector General (DoD IG) and the Army Audit Agency have issued five reports discussing contracted linguists. Unrestricted GAO reports can be accessed over the Internet at <http://www.gao.gov>. Unrestricted DoD IG reports can be accessed at <http://www.dodig.mil/audit/reports>.

GAO

GAO-08-1087, "DoD Needs to Address Contract Oversight and Quality Assurance Issues for Contracts Used to Support Contingency Operations," September 2008

DoD IG

DoDIG Report No. D-2011-112, "Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective," September 30, 2011

DoD IG Report No. D-2010-079, "Security Provisions in a U.S. Army Intelligence and Security Command Contract for Linguist Support," August 13, 2010

Army Audit Agency

A-2009-0144-ZBI, "Army Foreign Language Program Contracting," July 23, 2009

A-2007-0149-ALL, "Audit of The Army's Theater Linguist Program in Afghanistan, Operation Enduring Freedom," July 23, 2007

Appendix B. Recruiting, Testing, and Current Security Screening Process for Local Nationals

(FOUO) CENTCOM, (b) (2), (b) (7)(E)



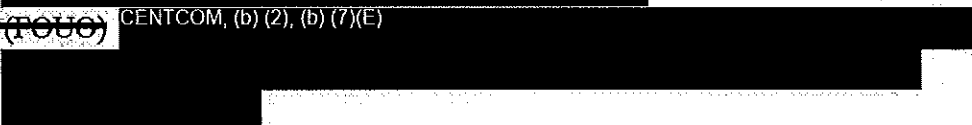
Local Nationals' Screening Process

(FOUO) CENTCOM, (b) (2), (b) (7)(E)

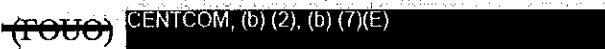


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- (FOUO) CENTCOM, (b) (2), (b) (7)(E)
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- (FOUO) CENTCOM, (b) (2), (b) (7)(E)
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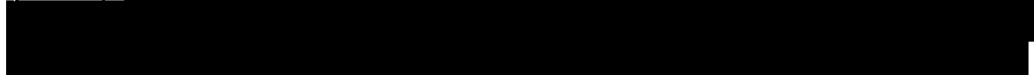
(FOUO) CENTCOM, (b) (2), (b) (7)(E)



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Recruiting Methods

(FOUO) CENTCOM, INSCOM, (b) (2), (b) (7)(E)



~~FOR OFFICIAL USE ONLY~~

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~~(FOUO)~~ CENTCOM, INSCOM, (b) (2), (b) (7)(E)

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- ~~(FOUO)~~ CENTCOM, INSCOM, (b) (2), (b) (7)(E)
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~~(FOUO)~~ CENTCOM, INSCOM, (b) (2), (b) (7)(E)

Oral Proficiency Test

~~(FOUO)~~ CENTCOM, INSCOM, (b) (2), (b) (7)(E)

~~FOR OFFICIAL USE ONLY~~

Written Proficiency Test

(FOUO)

CENTCOM, (b) (2), (b) (7)(E)



Medical Screening

(FOUO)

CENTCOM, INSCOM, (b) (2), (b) (7)(E)



FP Screening

CENTCOM, INSCOM, (b) (2), (b) (7)(E)



CI Screening

(FOUO)

CENTCOM, INSCOM, (b) (2), (b) (7)(E)



CENTCOM, INSCOM, (b) (2), (b) (7)(E)



(FOUO) CENTCOM, INSCOM, (b) (2), (b) (7)(E)



U.S. Army Intelligence and Security Command Comments



DEPARTMENT OF THE ARMY
UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND
8825 BEULAH STREET
FORT BELVOIR, VIRGINIA 22060-5246

IACS

24 Sep 2012

MEMORANDUM FOR Department of Defense Inspector General, 4800 Mark
Center Drive, Alexandria, VA 22350-1500

SUBJECT: Counterintelligence Screening Needed to Reduce Security Threat That
Unscreened Local National Linguists Pose to U.S. Forces (Project No. D2Q10-
D000JA-0165.002)

Enclosed are the INSCOM comments regarding the three recommendations in the
report cited above. This command concurs with these recommendations.

Encl
as

Chief of Staff

Project No. D2010-D000JA-0165.002, Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces

Finding: Adequate security screening needed to reduce the threat that unscreened linguists may pose to U.S. Forces. INSCOM officials did not effectively implement the security requirements for linguist contract W911W4-07-D-0010 in Afghanistan. Specifically, INSCOM did not ensure that Army policy requirements for screening linguists were incorporated into the contract in a timely manner. This occurred because INSCOM officials did not ensure the linguist contract included the most updated requirements for screening LN linguists. As a result, DoD did not conduct CI screening for 3,654 of 4,310 LN linguists in Afghanistan hired by MEP for CY 2009 and CY 2010. Furthermore, there is increased risk that LNs hired as linguists by MEP, who were not CI screened, may pose a threat to the security of U.S. and coalition forces operating in Afghanistan.

Recommendation A: We recommend that the Commander, U.S. Army Intelligence and Security Command and the Commander, U.S. Forces-Afghanistan, conduct a review to identify the local national linguists working on contract no. W911W4-07-D-0010 in Afghanistan that have not completed counterintelligence screening, and schedule and conduct a counterintelligence screening for each linguist.

Action Taken: INSCOM concurs with the recommendation. In March 2011, USFOR-A revised security vetting procedures IAW International Security Assistance Forces (ISAF) Standard Operating Procedure 233 to require CI screening of all local national linguists. As a result, re-CI screening of all local national linguists occurs every 6 to 12 months. Additionally, INSCOM has incorporated the current Army G-2 CI screening policy into contract documentation.

INSCOM has identified all contract linguists provided to USFOR-A for performance under the contract and respectfully defers to USFOR-A's comments regarding those requiring CI screening. USFOR-A has the responsibility for both policy and resources to conduct the CI screening in the CJOA-A.

Project No. D2010-D000JA-0165.002, Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces

Finding: The contractor approved its own work, which caused an organizational conflict of interest. MEP employees conducted CI screening of other MEP employees hired as linguists in Afghanistan and approved their own results of the screening, resulting in an OCI. INSCOM officials awarded two contracts to MEP: one contract to hire linguists and the other contract to conduct CI screening. INSCOM officials determined that an OCI existed after awarding the contract to conduct CI screening and MEP developed a plan to mitigate the conflict. However, INSCOM did not implement the mitigation plan. This occurred because INSCOM contracting officials did not conduct oversight of the plan to ensure that the Government, not MEP, approved the results of the CI screening. As a result, INSCOM has no assurance that CI screening used to determine if LN linguists constituted a security threat to U.S. and coalition forces and facilities was objective and thorough leaving the forces at risk for potential harm.

Recommendation B.1. (U) We recommend that Commander, U.S. Army Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan appoint a Government representative to approve the results of all counterintelligence screenings completed by MEP counterintelligence screeners to mitigate conflicts of interest.

Action Taken: INSCOM concurs with the recommendation and is in full compliance. The USFOR-A Theater Language Office has assigned a full time Department of the Army civilian (GS-14) CI adjudicator to approve the results of all CI screenings.

Project No. D2010-D000JA-0165.002, Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces

Finding: The contractor approved its own work, which caused an organizational conflict of interest. MEP employees conducted CI screening of other MEP employees hired as linguists in Afghanistan and approved their own results of the screening, resulting in an OCI. INSCOM officials awarded two contracts to MEP: one contract to hire linguists and the other contract to conduct CI screening. INSCOM officials determined that an OCI existed after awarding the contract to conduct CI screening and MEP developed a plan to mitigate the conflict. However, INSCOM did not implement the mitigation plan. This occurred because INSCOM contracting officials did not conduct oversight of the plan to ensure that the Government, not MEP, approved the results of the CI screening. As a result, INSCOM has no assurance that CI screening used to determine if LN linguists constituted a security threat to U.S. and coalition forces and facilities was objective and thorough leaving the forces at risk for potential harm.

Recommendation B.2. (U) We recommend that Commander, U.S. Army Intelligence and Security Command, and the Commander, U.S. Forces-Afghanistan assess mitigation plans to determine what measures are necessary to eliminate the organizational conflicts of interest in screening linguists in Afghanistan.

Action Taken: INSCOM concurs with the recommendation and is in full compliance. The USFOR-A Contract providing CI screening support has been restructured to mitigate OCI issues (i.e., contractors do not CI screen local nationals hired under other contracts awarded to their parent companies).

U.S. Forces-Afghanistan Comments



HEADQUARTERS
UNITED STATES FORCES-AFGHANISTAN
KABUL, AFGHANISTAN
APO AE 09356

USFOR-A COS

14 September 2012

MEMORANDUM THRU

United States Forces - Afghanistan (CJIG), APO AE 09356
United States Central Command (CCIC), McDill AFB, FL 33621

FOR Office of the Department of Defense - Inspector General, 4800 Mark Center Drive,
Alexandria, VA 22350-1500

SUBJECT: USFOR-A Theater Linguist Office (TLO) Response to the Draft Report
"Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local
National Linguists Pose to U.S. Forces" (D2010-D0001A-0165.002)

1. REFERENCE: Draft Report dated 31 Aug 2012, Department of Defense Inspector General.
2. Enclosed USFOR-A's response to recommendations A, B1, and B2 within the referenced DoD IG draft report.
3. Point of contact for this action is [REDACTED] Deputy TLO, at [REDACTED]
or email at [REDACTED]

[REDACTED]
Colonel, U.S. Army
Director, Theater Linguist Office
United States Forces-Afghanistan

DRAFT REPORT

"Counterintelligence Screening Needed to Reduce Security Threat That Unscreened Local National Linguists Pose to U.S. Forces" (D2010-D0001A-0165,002)

USFOR-A THEATER LINGUIST OFFICE (TLO)
GENERAL COMMENTS ON THE DRAFT REPORT

1. Recommendation A, Page 8 states:

The Commander, US Army Intelligence and Security Command and the Commander, US Forces-Afghanistan, conduct a review to identify the local national linguists ((LNL) working on contract no. W911W4-07-D-0010 in Afghanistan that have not completed counterintelligence screening, and schedule and conduct a counterintelligence screening for each linguist.

a. Concur. USFOR-A Theater Linguist Office (TLO)/ISAF CJ2X response:

- 1) The original DoD IG investigation (D2010-D0001A-0165,002) was conducted in October 2010 and the draft report was issued on 31 August 2012.
- 2) USFOR-A established the Theater Linguist Office (TLO) in February 2011 to oversee all linguist requirements in the CJOA-A.
- 3) Based on the current Draft DoD IG findings, USFOR-A TLO and ISAF CJ2X collaborated to verify all of the 5,032 LNLs that are currently working in the CJOA-A have completed the CI screening requirement.
 - a) Since March 2011, all INSCOM local national contract linguists MUST pass a CI screening before being hired and must be enrolled in the Biometric Automated Toolset (BATS) in accordance with ISAF SOP 233.
 - b) TLO CI Adjudicator (DA GS-14 hired in March 2012) will continue to ensure that all LNLs complete the CI screening requirement. The ISAF CJ2X established the CIST contract in Fall 2011 and it is comprised of L3, Six3, and MHP contractors. Each CIST is led by a L3 contractor.

2. Recommendation B1, Page 12 states:

The Commander, US Army Intelligence and Security Command and the Commander, US Forces-Afghanistan, appoint a government representative to approve the results of all counterintelligence screenings completed by MEP counterintelligence screeners to mitigate conflict of interest.

a. Concur. USFOR-A Theater Linguist Office (TLO)/ISAF CJ2X response:

- 1) USFOR-A TLO CI Adjudicator and US military CI teams co-located with the CIST provide government oversight of CIST CI screening.
- 2) The CIST provides a Memo For Record (MFR) for a completed CI screening, which is now tracked by the TLO CI Adjudicator.

DRAFT REPORT

"Counterintelligence Screening Required to Reduce Security Threats that Increased Local National Language Poses to U.S. Forces" (D2610.1) (DDA-0165.002)

**USFOR-A THEATER LINGUIST OFFICE (TLO)
GENERAL COMMENT ON THE DRAFT REPORT**

Recommendation B2, Page 12 states:

The Commander, U.S. Army Intelligence and Security Command and the Commander, U.S. Forces-Afghanistan, Assess collection plans to determine what measures are necessary to eliminate the organizational conflicts of interest in screening linguists in Afghanistan.

- a. Concur. USFOR-A Theater Linguist Office (TLO) ISAF C2EN response. MIP does not conduct any counterintelligence screening of MIP contract linguists and all CI screening results from the CIST are provided to oversight is provided by the TLO C2 Adjutant and U.S. military teams co-located with the CIST.

APPROVED BY:

CDR, U.S. Army
Director, Theater Linguist Office
United States Forces-Afghanistan

PREPARED BY:

CDR, U.S. Army
GPO-05, CJ2 TLO

CDR, U.S. Army
Director, C2EN
United States Forces-Afghanistan

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Inspector General
Department of Defense



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