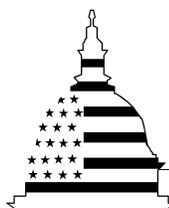


January 2009

AFGHANISTAN SECURITY

Lack of Systematic Tracking Raises Significant Accountability Concerns about Weapons Provided to Afghan National Security Forces

**This Report Is Temporarily Restricted Pending
Official Public Release.**



G A O

Accountability * Integrity * Reliability



Highlights of [GAO-09-267](#), a report to congressional committees

Why GAO Did This Study

The Department of Defense (Defense), through its Combined Security Transition Command-Afghanistan (CSTC-A) and with the Department of State (State), directs international efforts to train and equip Afghan National Security Forces (ANSF). As part of these efforts, the U.S. Army Security Assistance Command (USASAC) and the Navy spent about \$120 million to procure small arms and light weapons for ANSF. International donors also provided weapons. GAO analyzed whether Defense can account for these weapons and ensure ANSF can safeguard and account for them. GAO reviewed Defense and State documents on accountability procedures, reviewed contractor reports on ANSF training, met with U.S. and Afghan officials, observed accountability practices, analyzed inventory records, and attempted to locate a random sample of weapons.

What GAO Recommends

To improve weapons accountability, GAO recommends the Secretary of Defense (1) establish clear accountability procedures, including serial number tracking and routine physical inventories, for weapons in U.S. control and custody; (2) direct CSTC-A to assess and verify each ANSF unit's capacity to safeguard and account for weapons; and (3) provide adequate resources to CSTC-A to train, mentor, and assess ANSF in equipment accountability matters. Defense concurred with these recommendations, but did not state when the shortcomings we identified would be addressed. State provided no comments.

To view the full product, including the scope and methodology, click on [GAO-09-267](#). For more information, contact Charles M. Johnson, Jr. at (202) 512-7331 or johnsoncm@gao.gov.

AFGHANISTAN SECURITY

Lack of Systematic Tracking Raises Significant Accountability Concerns about Weapons Provided to Afghan National Security Forces

What GAO Found

Defense did not establish clear guidance for U.S. personnel to follow when obtaining, transporting, and storing weapons for the Afghan National Security Forces, resulting in significant lapses in accountability. While Defense has accountability requirements for its own weapons, including serial number tracking and routine inventories, it did not clearly specify whether they applied to ANSF weapons under U.S. control. GAO estimates USASAC and CSTC-A did not maintain complete records for about 87,000, or 36 percent, of the 242,000 U.S.-procured weapons shipped to Afghanistan. For about 46,000 weapons, USASAC could not provide serial numbers, and GAO estimates CSTC-A did not maintain records on the location or disposition of about 41,000 weapons with recorded serial numbers. CSTC-A also did not maintain reliable records for about 135,000 weapons it obtained for ANSF from 21 other countries. Accountability lapses occurred throughout the supply chain and were primarily due to a lack of clear direction and staffing shortages. During our review, CSTC-A began correcting some shortcomings, but indicated that its continuation of these efforts depends on staffing and other factors.

Despite CSTC-A's training efforts, ANSF units cannot fully safeguard and account for weapons and sensitive equipment. Defense and State have deployed hundreds of trainers and mentors to help ANSF establish accountability practices. CSTC-A's policy is not to issue equipment without verifying that appropriate supply and accountability procedures are in place. Although CSTC-A has not consistently assessed ANSF units' ability to account for weapons, mentors have reported major accountability weaknesses, which CSTC-A officials and mentors attribute to a variety of cultural and institutional problems, including illiteracy, corruption, and unclear guidance. Further, CSTC-A did not begin monitoring the end use of sensitive night vision devices until 15 months after issuing them to Afghan National Army units.

Types and Quantities of U.S.-Procured Weapons Shipped to Afghanistan for ANSF (December 2004-June 2008)

| Weapon category | Quantity shipped |
|--|------------------|
|  Rifles | 117,163 |
|  Pistols | 62,055 |
|  Machine guns | 35,778 |
|  Grenade launchers | 18,656 |
|  Shotguns | 6,704 |
|  Rocket-propelled grenade launchers | 1,620 |
|  Mortars and other weapons | 227 |
| Total | 242,203 |

Source: GAO analysis of Defense data.

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Abbreviations

| | |
|--------|--|
| ANSF | Afghan National Security Forces |
| CSTC-A | Combined Security Transition Command-Afghanistan |
| DSCA | Defense Security Cooperation Agency |
| FMS | Foreign Military Sales |
| IPO | International Programs Office |
| SAO | security assistance organization |
| USASAC | U.S. Army Security Assistance Command |

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United States Government Accountability Office
Washington, DC 20548

January 30, 2009

The Honorable Howard L. Berman
Chairman
The Honorable Ileana Ros-Lehtinen
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable John F. Tierney
Committee on Oversight and Government Reform
House of Representatives

As part of international efforts to train and equip the Afghan National Army and the Afghan National Police, collectively referred to as the Afghan National Security Forces (ANSF), the U.S. Department of Defense (Defense) obtained and provided or intends to provide about 380,000 small arms and light weapons,¹ as well as other equipment and supplies. Defense and 21 donor nations report the value of these weapons at over \$223 million. Given the unstable security conditions in Afghanistan, the risk of loss and theft of these weapons is significant.

The United States has provided most of the U.S.-procured weapons to Afghanistan using an adaptation of the Foreign Military Sales (FMS) program,² which is managed by the Defense Security Cooperation Agency (DSCA) in cooperation with other U.S. military organizations, including the U.S. Army Security Assistance Command (USASAC) and the Navy International Programs Office (IPO).³ Defense purchased weapons using funds appropriated by Congress for the Afghanistan Security Forces Fund, funds drawn down under authority provided in the Afghan Freedom

¹These include grenade launchers, machine guns, rocket-propelled grenade launchers, mortars, pistols, rifles, and shotguns. For the purposes of this report, we use the term “weapons” to refer to these small arms and light weapons.

²Defense refers to this adaptation of FMS as “pseudo-FMS.”

³USASAC and Navy IPO implement U.S. security assistance programs, including Foreign Military Sales of defense articles and services, to eligible foreign governments.

Support Act, and Foreign Military Financing funds.⁴ The Combined Security Transition Command-Afghanistan (CSTC-A), a joint service, coalition organization under the command and control of Defense's U.S. Central Command, is primarily responsible for the training and equipping of ANSF with support from the Department of State (State).⁵ As part of that responsibility, CSTC-A receives and stores weapons provided by the United States and international donors and distributes them to ANSF units. In addition, CSTC-A is responsible for conducting U.S. government security assistance activities in Afghanistan, including monitoring the end use of U.S.-procured weapons and other sensitive equipment.

At your request, we reviewed the accountability for weapons that Defense obtained, transported, stored, and distributed to ANSF.⁶ In particular, we examined (1) whether Defense can account for weapons intended for ANSF, and (2) the extent to which CSTC-A has ensured that ANSF can properly safeguard and account for weapons and other sensitive equipment issued to ANSF.

To address these objectives, we reviewed documentation and interviewed officials from Defense, U.S. Central Command, CSTC-A, USASAC, and Navy IPO. On the basis of records provided to us, we compiled detailed information on weapons reported as shipped to CSTC-A in Afghanistan by the United States and other countries from June 2002 through June 2008. We traveled to Afghanistan in August 2008 to examine records and meet with officials at CSTC-A headquarters, visit the two central depots where the weapons provided for ANSF are stored, and meet with staff at an

⁴See Afghanistan Freedom Support Act of 2002, P.L. 107-327, Dec. 4, 2002. Funds were appropriated to the Afghanistan Security Forces Fund starting in 2005 in the Emergency Supplemental Appropriation Act for Defense, the Global War on Terror and Tsunami Relief, 2005, P.L. 109-13, May 11, 2005. FMS cases are typically funded with participating countries' own resources or by Foreign Military Financing funds generally appropriated in the annual foreign operations and export financing appropriations acts. Foreign Military Financing funds were used to purchase only about 550 weapons for ANSF.

⁵For more information on this effort, see GAO, *Afghanistan Security: Further Congressional Action May Be Needed to Ensure Completion of a Detailed Plan to Develop and Sustain Capable Afghan National Security Forces*, GAO-08-661 (Washington, D.C.: June 18, 2008).

⁶Defense defines accountability as the obligation imposed by law, lawful order, or regulation, accepted by an organization or person for keeping accurate records, to ensure control of property, documents, or funds, with or without physical possession (DODI 5000.64, *Accountability and Management of DOD-Owned Equipment and Other Accountable Property*, E2.2).

Afghan National Army unit that had received weapons.⁷ While in Afghanistan we attempted to determine the location or disposition of a random sample of weapons in order to reach general conclusions about CSTC-A's ability to account for weapons purchased by the United States for ANSF.⁸ We also discussed equipment accountability with cognizant officials from the Afghan Ministries of Defense and Interior, the U.S. Embassy, and contractors involved in building ANSF's capacity to account for and manage its weapons inventory.⁹ We also met with officials from Defense's Office of Inspector General to discuss an audit it had completed relating to weapons accountability in Afghanistan during 2008 and reviewed the related report.¹⁰

We performed our work from November 2007 through January 2009 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. A detailed description of our scope and methodology is included in appendix I of this report.

Results in Brief

Defense did not provide clear guidance to U.S. personnel as to what accountability procedures applied when handling, transporting, and storing weapons obtained for the ANSF, resulting in significant lapses in accountability for these weapons. Although Defense has accountability procedures for its own weapons, including tracking by serial number and conducting routine physical inventories, it did not clearly establish to what extent these procedures would apply to weapons obtained for ANSF. USASAC and CSTC-A did not maintain complete inventory records for an

⁷Due to travel restrictions imposed by CSTC-A based on heightened security threats during our visit to Afghanistan in August 2008, we were only able to travel to one ANSF unit located near Kabul.

⁸All percentage estimates from this sample have a margin of error of plus or minus 5 percent or less, at the 95 percent confidence level. All numeric estimates have a margin of error of plus or minus 10,000 weapons at the 95 percent confidence level.

⁹The Ministry of Defense has authority over the Afghan National Army, while the Ministry of Interior has authority over the Afghan National Police.

¹⁰Department of Defense Inspector General, *Assessment of Arms, Ammunition, and Explosives Accountability and Control; Security Assistance; and Sustainment for the Afghan National Security Forces* (Report No. SPO-2009-001), Oct. 24, 2008.

estimated 87,000 weapons—or about 36 percent—of the 242,000 weapons that the United States procured and shipped to Afghanistan from December 2004 through June 2008.¹¹ For about 46,000 of these weapons USASAC and CSTC-A could not provide serial numbers, and for an estimated 41,000 weapons with recorded serial numbers,¹² CSTC-A did not maintain any records of their location or disposition. Furthermore, CSTC-A did not maintain reliable records, including serial numbers, for any of the weapons it obtained from international donors from June 2002 through June 2008, which, according to CSTC-A, totaled about 135,000 weapons. Lapses in accountability occurred throughout the supply chain. For example, during the transportation of U.S.-procured weapons into Afghanistan, USASAC and Navy IPO did not provide serial number information to CSTC-A to verify receipt. Additionally, after receiving weapons in Kabul, CSTC-A did not record their serial numbers or routinely conduct physical inventories at the central depots where the weapons were stored. This was primarily due to a lack of clear direction from Defense and staffing shortages. Although the weapons were in CSTC-A control and custody until they were issued to ANSF units, U.S. Central Command and CSTC-A officials did not have a common understanding of when the weapons were considered formally transferred to ANSF and no longer subject to Defense accountability procedures. During the course of our review, USASAC indicated that it would begin recording serial numbers for all weapons it procures for ANSF, and in June 2008 CSTC-A established standard operating procedures to track weapons by serial number in Afghanistan and began conducting routine physical inventories of the weapons stored at the central depots. However, CSTC-A has indicated that its continued implementation of these new accountability procedures is not certain, considering staffing constraints and other factors.

Despite CSTC-A training efforts, ANSF units cannot fully safeguard and account for weapons. As a result, weapons CSTC-A has provided to ANSF are at serious risk of theft or loss. Also, CSTC-A did not begin monitoring the end use of sensitive night vision devices until about 15 months after issuing them to Afghan National Army units.

¹¹December 2004 reflects USASAC's earliest reported shipment of U.S.-procured weapons for ANSF, and June 2008 reflects the latest shipment data available prior to our August 2008 fieldwork in Afghanistan.

¹²This estimated amount reflects the results of our testing of a generalizable sample selected randomly from 195,671 U.S.-procured weapons for which Defense could provide serial numbers; the estimate has a margin of error of +/- 10,000 weapons at the 95 percent confidence level. See appendix I for more detail about the random sample.

-
- *Development of ANSF equipment accountability.* CSTC-A's policy is not to issue equipment to ANSF without verifying that appropriate supply and accountability procedures are in place. Recognizing the need for weapons accountability at ANSF units, CSTC-A and State have deployed hundreds of U.S. military trainers and contract mentors to help the Afghan army and police establish equipment accountability practices, among other things. Although CSTC-A has not consistently assessed ANSF units' ability to safeguard and account for weapons and other equipment, contract mentors have reported extensively on major ANSF accountability weaknesses. Contractors and CSTC-A officials have attributed these weaknesses to a variety of cultural and institutional problems, including illiteracy, corruption, and unclear guidance from Afghan ministries.
 - *End use monitoring.* According to DSCA officials, U.S.-procured weapons and sensitive equipment provided to ANSF are subject to end use monitoring, which is meant to provide reasonable assurances that ANSF is using equipment for its intended purposes. DSCA has published end use monitoring guidance that calls for, among other things, intensive controls over sensitive defense items, such as night vision devices, which are considered dangerous to the public and U.S. forces in the wrong hands.¹³ In May 2008, CSTC-A developed an end use monitoring plan and began implementing it in July 2008, but has not had sufficient staff to conduct the monitoring envisioned. CSTC-A also began monitoring the end use of sensitive and potentially dangerous night vision devices in October 2008—15 months after it had first issued them to the Afghan National Army. Of the 2,410 devices issued, 10 are currently unaccounted for, according to CSTC-A. DSCA had not ensured that the appropriate end use monitoring was performed for these devices because it was not aware that CSTC-A had purchased them. To address this matter, DSCA and CSTC-A have established procedures to prohibit CSTC-A's procurement of weapons and sensitive equipment in-country without DSCA involvement.

We are making several recommendations to help improve accountability for weapons and other sensitive equipment that the United States provides to ANSF. In particular, we recommend that the Secretary of Defense (1) establish clear accountability procedures for weapons while they are in the control and custody of the United States and direct USASAC, CSTC-A, and other military organizations involved in providing these weapons to track all weapons by serial number and conduct routine physical inventories; (2) direct CSTC-A to specifically assess and verify each ANSF

¹³DoD 5105.38-M, *Security Assistance Management Manual*, Oct. 3, 2003, Chapter 8.

unit's capacity to safeguard and account for weapons and other sensitive equipment before providing such equipment, unless a specific waiver or exception is granted; and (3) devote adequate resources to CSTC-A's effort to train, mentor, and assess ANSF in equipment accountability matters.

We provided a draft of this report for review and comment to Defense and State. Defense concurred with our recommendations and provided additional information on its efforts to help ensure accountability for weapons intended for the ANSF. However, Defense did not state when it planned to address the shortcomings we identified. Defense also provided technical corrections, which we incorporated into the report as appropriate. State did not provide comments.

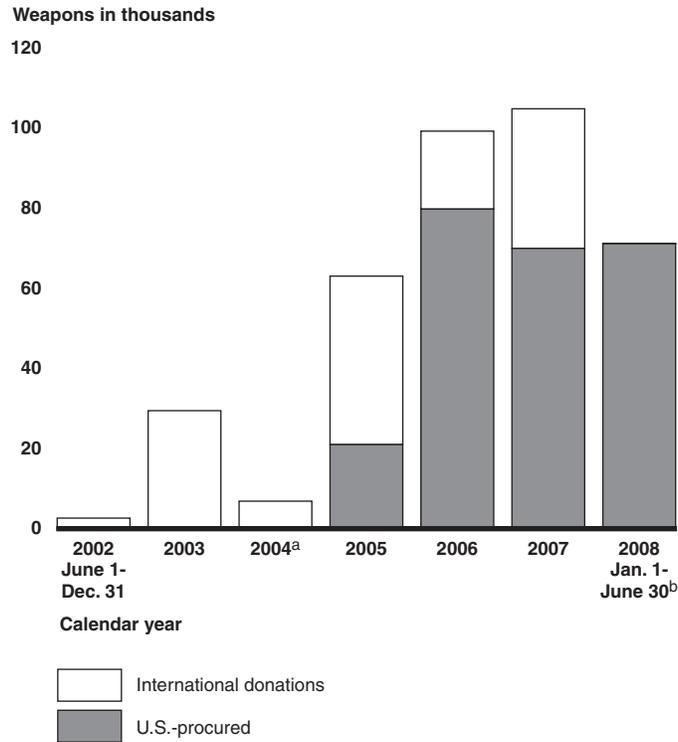
Background

From fiscal year 2002 to fiscal year 2008, the U.S. government provided approximately \$16.5 billion for the training and equipping of Afghan National Security Forces. State and Defense officials told us they will request over \$5.7 billion to train and equip the Afghan army and police in fiscal year 2009. The goal of these efforts is to transfer responsibility for the security of Afghanistan from the international community to the Afghan government. As part of this effort, from June 2002 through June 2008, CSTC-A obtained about 380,000 small arms and light weapons from the United States and other countries for the Afghan army and police. The United States purchased over 240,000 of these weapons for about \$120 million and shipped them to Afghanistan beginning in December 2004. Also, CSTC-A reported that it coordinated the donation of about 135,000 additional weapons from 21 countries, which valued their donations at about \$103 million (see app. II).¹⁴ Figure 1 illustrates the number of weapons obtained for ANSF by USASAC, Navy IPO, and international donors since June 2002.¹⁵

¹⁴CSTC-A officials told us they had not evaluated the reliability of the values assigned by donors for these weapons and noted that some values may be overstated, as many of the items donated were used, damaged, or unusable. Furthermore, we were unable to independently verify the weapons quantities that CSTC-A reported to us.

¹⁵CSTC-A also received weapons from the disarmament of Afghan militias, but we did not include these in our analysis.

Figure 1: Weapons Obtained for ANSF through U.S. Procurement and International Donations by Calendar Year (June 1, 2002-June 30, 2008)



Source: GAO analysis of USASAC, Navy, and CSTC-A data.

^aIncludes 137 U.S.-procured weapons

^bIncludes 60 weapons from international donors

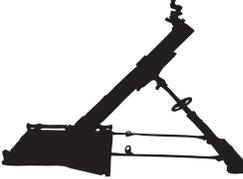
The United States and international donors have provided rifles, pistols, machine guns, grenade launchers, shotguns, rocket-propelled grenade launchers, and other weapons. About 80 percent of the U.S.-procured weapons were “non-standard” weapons, which are not typically supplied by Defense.¹⁶ Many non-standard weapons, including about 79,000 AK-47 rifles,¹⁷ were received from former Warsaw Pact countries or were

¹⁶For the purposes of this report, we use the term “non-standard weapons” to indicate weapons that have not been assigned a U.S. National Stock Number. Defense Logistics Agency uses those numbers to identify items that are repeatedly bought, stocked, stored, issued, and used throughout the federal supply system.

¹⁷Included in this sum are AMD-65 rifles, which are AK-47 variants.

obtained from vendors in those countries. (See fig. 2 for details on U.S.-procured weapons shipped to Afghanistan for ANSF.)

Figure 2: Types and Quantities of U.S.-Procured Weapons Shipped to Afghanistan for ANSF (December 2004-June 2008)

| Weapon category | Quantity shipped |
|--|------------------|
|  Rifles | 117,163 |
|  Pistols | 62,055 |
|  Machine guns | 35,778 |
|  Grenade launchers | 18,656 |
|  Shotguns | 6,704 |
|  Rocket-propelled grenade launchers | 1,620 |
|  Mortars and other weapons ^a | 227 |
| Total | 242,203 |

Source: GAO analysis of Defense data.

^aThis category includes missile and rocket launchers.

USASAC and Navy IPO procured most of the 242,000 weapons for ANSF through an adaptation of the Foreign Military Sales (FMS) program referred to by Defense as “pseudo-FMS.” As in traditional FMS, pseudo-FMS procurements are overseen by DSCA. However, in contrast to traditional FMS procurements, for Afghanistan, Defense primarily used funds appropriated by the Congress for the Afghanistan Security Forces

Fund to purchase weapons to train and equip ANSF.¹⁸ USASAC procured about 205,000 (85 percent) of these weapons, including about 135,000 non-standard weapons purchased from four U.S.-based contractors. Navy IPO provided the remaining 37,000 (15 percent) M-16 rifles for the Afghan National Army.

After procuring weapons for ANSF, Defense or its contractors transported them to Afghanistan by air, and CSTC-A received the weapons at Kabul International Airport.¹⁹ The Afghan National Army transported the weapons from the airport to one of two central storage depots in Kabul—one for the Afghan National Army and another for the Afghan National Police.²⁰ Due to the limited operational capacity of the Afghan army and police and the extremely hostile environment in which they operate, CSTC-A retains control and custody of the weapons provided by the United States and international donors during storage at the central depots until the weapons are issued to ANSF units. In addition to maintaining the security and control of weapons stored at the central depots, CSTC-A trains ANSF in inventory management and weapons accountability. To this end, the central depots are staffed by U.S. and coalition military personnel, U.S. contractors, contract Afghan staff, and ANSF personnel.

According to DSCA officials, equipment provided to ANSF is subject to end use monitoring,²¹ which is meant to provide reasonable assurances that the ANSF is using the equipment for its intended purposes. CSTC-A serves as the security assistance organization (SAO) for Afghanistan, with responsibility for monitoring the end use of U.S.-procured weapons and

¹⁸FMS cases are typically funded with participating countries' own resources or by Foreign Military Financing funds generally appropriated in the annual foreign operations and export financing appropriations acts. Foreign Military Financing funds were used to purchase only about 550 weapons for ANSF.

¹⁹Weapons are flown into Kabul by the Defense Transportation System's Special Assignment Airlift Mission and commercial flights (for weapons procured by contractors working for USASAC).

²⁰One depot (called Depot 1) contains Afghan National Army weapons, while the other depot (called 22 Bunkers) contains Afghan National Police weapons as well as ammunition for both the army and police.

²¹This includes weapons and other equipment provided through FMS and pseudo-FMS.

other equipment provided to ANSF, among other security assistance duties.²²

DSCA's Security Assistance Management Manual provides guidance for end use monitoring, which is classified as either "routine" or "enhanced," depending on the sensitivity of the equipment and other factors, as follows:²³

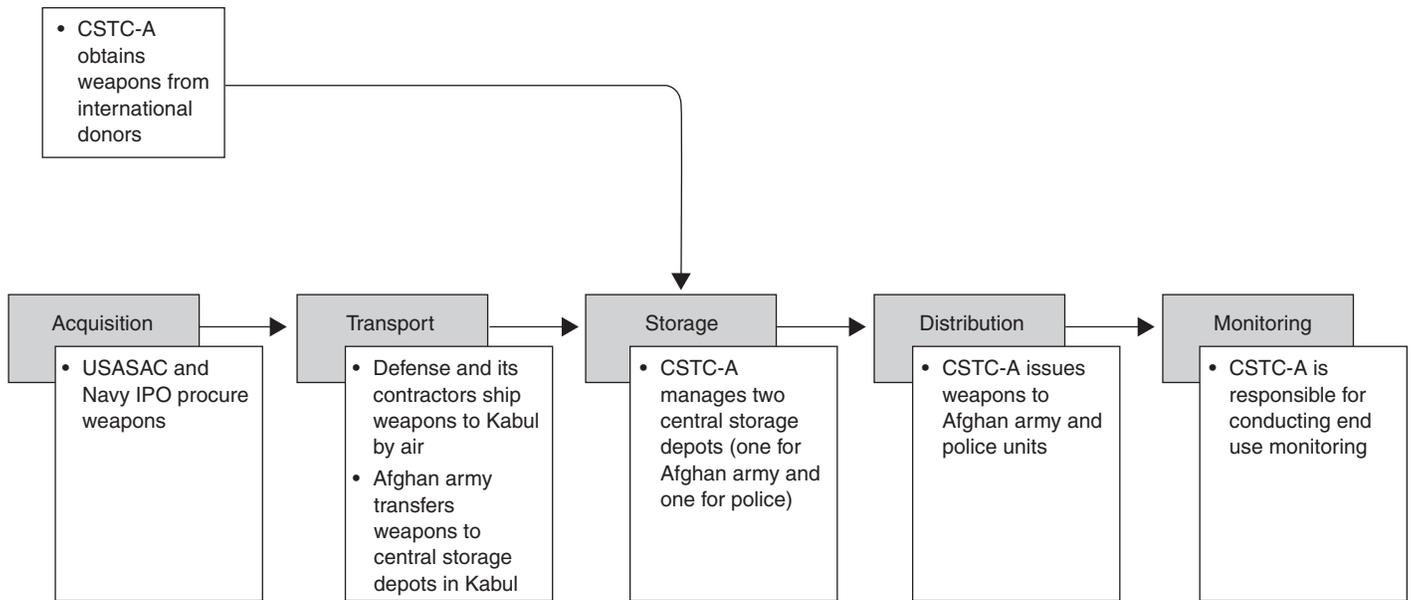
- *Routine end use monitoring.* For non-sensitive equipment provided to a trusted partner, DSCA guidance calls for SAOs to conduct routine monitoring in conjunction with other required security assistance duties. As such, according to DSCA officials, DSCA expects SAOs to record relevant end use monitoring observations made during interactions with host country military and defense officials, such as visits to defense facilities, meetings or telephone conversations, military ceremonies, and dignitary visits.
- *Enhanced end use monitoring.* For sensitive defense articles and technology transfers made within sensitive political situations, DSCA guidance calls for more intensive and formal monitoring. This includes providing DSCA with equipment delivery records with serial numbers, conducting routine physical inventories of the equipment by serial number, and quarterly reporting on inventory results.

Figure 3 illustrates the accountability process for weapons that CSTC-A provides to ANSF.

²²When no SAO is established in a country, security assistance functions are normally handled by the Defense attaché office, either as an additional duty or with augmented personnel. In a small number of embassies (primarily in developing countries) where there is no Defense attaché representation, the security assistance program is managed by Foreign Service personnel from State.

²³DoD 5105.38-M, Chapter 8.

Figure 3: Accountability Process for Weapons Provided to ANSF by the United States and International Donors



Source: GAO analysis of information provided by Defense and CSTC-A.

Defense Cannot Fully Account for Weapons

Defense did not establish clear guidance on what accountability procedures apply when it is handling, transporting, and storing weapons obtained for ANSF through U.S. procurements and international donations. As a result, our tests and analysis of inventory records show significant lapses in accountability for these weapons. Such accountability lapses occurred throughout the weapons supply process. First, when USASAC and CSTC-A initially obtained weapons for ANSF, they did not record all the corresponding serial numbers. Second, USASAC and CSTC-A did not maintain control or visibility over U.S.-procured weapons during transport to the two ANSF central storage depots in Kabul. Third, CSTC-A did not maintain complete and accurate inventory records or perform physical inventories of weapons stored at the central depots. Finally, inadequate U.S. and ANSF staffing at the central depots along with poor security and persistent management challenges have contributed to the vulnerability of stored weapons to theft or misuse. These lapses have hampered CSTC-A's ability to detect weapons theft or other losses. CSTC-A has recently taken steps to correct some of the deficiencies we identified, but CSTC-A has indicated that its continued implementation of the new accountability procedures is not certain, considering staffing constraints and other factors.

Lack of Clear Accountability Procedures

Defense did not clearly establish what accountability procedures applied to the physical security of weapons intended for ANSF. As a result, the Defense organizations involved in providing weapons for ANSF, including DSCA, USASAC, Navy IPO, U.S. Central Command, and CSTC-A, did not have a common understanding of what accountability procedures to apply to these weapons while they were in U.S. control and custody.

Defense guidance on weapons accountability lays out procedures for Defense organizations to follow when handling, storing, protecting, securing, and transporting Defense-owned weapons.²⁴ These procedures include (1) serial number registration and reporting and (2) 100 percent physical inventories of weapons stored in depots by both quantity and serial number at least once annually. The objective of serial number registration and reporting procedures, according to Defense guidance, is to establish continuous visibility over weapons through the various stages of the supply process, including “from the contractor to depot; [and] in storage.”²⁵ However, Defense did not specifically direct U.S. personnel to apply these or any alternative weapons accountability procedures for the weapons in their control and custody intended for ANSF, and CSTC-A officials we spoke to were uncertain about the applicability of existing Defense guidance.

In August 2008, the Under Secretary of Defense for Intelligence emphasized the importance of safeguarding weapons in accordance with existing accountability guidance until they are formally transferred to ANSF, stating that “the security of conventional [arms, ammunition, and explosives] is paramount, as the theft or misuse of this material would gravely jeopardize the safety and security of personnel and installations world-wide.”²⁶ However, in October 2008, Defense’s Inspector General reported that U.S. Central Command had not clearly defined procedures

²⁴This guidance includes DoD 5100.76-M, *Physical Security of Sensitive Conventional Arms, Ammunition and Explosives*, August 12, 2000; DoD 4140.1-R, *DoD Material Management Regulation*, May 1, 1998; and DoD 4000.25-M, *Defense Logistics Management System*, March 2008.

²⁵DoD 4000.25-M, Vol. 2, Chapter 18, C18.3.1.

²⁶The Under Secretary of Defense for Intelligence clarified the applicability of existing Defense guidance, specifically DoD 5100.76-M, indicating that “the policy remains unchanged as it applies to all [Defense] components involved in any procurement, use, shipment, storage, inventory control, disposal by sale, or destruction of any conventional arms, ammunition, and explosives. [Defense] components possessing or having custody of [these items] shall comply with protection requirements until formal transfer to a foreign nation.”

for accountability, control, and physical security of U.S.-supplied weapons to ANSF, and as a result, misplacement, loss, and theft of weapons may not be prevented.²⁷ The Inspector General recommended, among other things, that U.S. Central Command issue formal guidance directing the commands and forces in its area of responsibility, including CSTC-A, to apply existing Defense weapons accountability procedures. U.S. Central Command and the Office of the Under Secretary of Defense for Intelligence concurred with this recommendation. Nonetheless, U.S. Central Command officials we spoke to in December 2008 did not have a common understanding of when formal transfer of the weapons to ANSF is considered to have occurred, and hence up to what point to apply Defense accountability procedures, if at all. As of December 2008, U.S. Central Command had not decided what new guidance to issue.

In July 2007, we made Defense and the Multinational Force-Iraq aware that they had not specified which accountability procedures applied for weapons provided to Iraq under the train-and-equip program in that country.²⁸ To help ensure that U.S.-funded equipment reaches the Iraqi security forces as intended, we recommended that the Secretary of Defense determine which accountability procedures should apply to that program. In January 2008, the Congress passed legislation²⁹ requiring that no defense articles may be provided to Iraq until the President certifies that a registration and monitoring system has been established and includes, among other things, the serial number registration of all small arms to be provided to Iraq, and a detailed record of the origin, shipping, and distribution of all defense articles transferred under the Iraq Security Forces Fund or any other security assistance program.³⁰

²⁷See SPO-2009-001.

²⁸See GAO, *Stabilizing Iraq: DOD Cannot Ensure that U.S.-Funded Equipment Has Reached Iraqi Security Forces*, [GAO-07-771](#) (Washington, D.C.: July 31, 2007).

²⁹National Defense Authorization Act for Fiscal Year 2008, P.L. 110-181, Jan. 28, 2008.

³⁰In April 2008, the Multinational Transition Command-Iraq issued logistics accountability standard operating procedures to implement U.S. law and policy and provide mandatory direction to all of its personnel for the maintenance of materiel accountability through the process of acquisition, receipt, storage, and distribution up to and including the point of issuance to the Government of Iraq.

USASAC and CSTC-A Did Not Maintain Complete Inventory Records for Weapons

On the basis of our data analysis and tests of weapons inventory records, we estimate that USASAC and CSTC-A did not maintain complete records for about 87,000 weapons—about 36 percent of over 242,000 weapons they procured for ANSF and shipped from December 2004 through June 2008.³¹ For about 46,000 weapons, USASAC did not maintain serial number records—information fundamental to weapons accountability—and for an estimated 41,000 weapons, CSTC-A did not maintain documentation on the location or disposition, based on our testing of a random sample of available serial number records.³² Weapons for which CSTC-A could not provide complete accountability records were not limited to any particular type of weapon or a specific shipment period. Records were missing for six of the seven types of weapons we tested and from shipments made during every year from 2004 to 2008.³³

In addition, CSTC-A did not maintain complete or reliable records for the weapons it reported it had obtained from international donations from June 2002 through June 2008. According to CSTC-A, this totals about 135,000 weapons.

Lapses in Accountability Began When Weapons Were Obtained

USASAC and Navy IPO records indicate that they procured over 242,000 weapons and shipped them to Afghanistan from December 2004 through June 2008. However, USASAC did not record and maintain the serial numbers for over 46,000 of the weapons it purchased.³⁴ USASAC's records were incomplete because it did not require contractors to submit serial numbers for non-standard weapons they provided—a standard practice in traditional Foreign Military Sales. In July 2008, USASAC indicated that it would begin recording serial numbers for all weapons it procures for ANSF. (See app. III for a timeline of key events relating to accountability for ANSF weapons and other sensitive equipment.) However, as of December 2008 USASAC had not yet included provisions in its

³¹December 2004 reflects USASAC's earliest reported shipment of U.S.-procured weapons for ANSF, and June 2008 reflects the latest shipment data available prior to our August 2008 fieldwork in Afghanistan.

³²This estimated amount reflects the results of our testing of a generalizable sample selected randomly from 195,671 U.S.-procured weapons for which Defense could provide serial numbers; we could not conduct similar testing for about 46,000 U.S.-procured weapons for which serial number records were not available; the estimate has a margin of error of +/- 10,000 weapons at the 95 percent confidence level.

³³Our random sample did not include any weapons from the "other" category.

³⁴Navy IPO kept a complete serial number accounting of all the M-16s it provided.

procurement contracts requiring the vendors of nonstandard weapons to provide these serial numbers.

Furthermore, CSTC-A did not record the serial numbers for the weapons it received from international donors and stored in the central depots in Kabul for eventual distribution to ANSF. In a July 2007 memorandum, the Commanding General of CSTC-A noted that for international donations there was “no shipping paperwork to confirm receipt, and equipment was not inventoried at arrival for validation.” By not recording serial numbers for weapons upon receipt, USASAC and CSTC-A could not verify the delivery and subsequent control of weapons in Afghanistan. In July 2008, CSTC-A began to record serial numbers for all the weapons it received, including U.S.-procurements and international donations. However, CSTC-A had indicated that its continued recording of serial numbers was not certain. In the standard operating procedures it established in July 2008, CSTC-A indicated that it would record these numbers “if conditions are favorable with enough time and manpower allotted to inventory.” In December 2008, CSTC-A officials told us that to date they were fully implementing these new procedures.

Defense and CSTC-A Did Not Maintain Control or Oversight of Weapons during Transport or Document Title Transfer

USASAC, Navy IPO, CSTC-A, Defense shippers, and contractors have been involved in arranging the transport of U.S.-procured weapons into Kabul by air. However, these organizations did not communicate adequately to ensure that accountability was maintained over weapons during transport. In particular, according to CSTC-A officials:

- USASAC and Navy IPO did not always provide CSTC-A with serial number records for weapons shipped to Afghanistan against which CSTC-A could verify receipt.³⁵
- Defense shippers sometimes split weapons shipments among multiple flights, making it difficult for CSTC-A to reconcile partial shipments received at different times with the information the suppliers provided for the entire order.
- Suppliers did not always label weapons shipments clearly, leading to confusion over their contents and intended destinations.

³⁵Transferring serial number records in this way is an element of the weapons accountability procedures defined in DoD 4000.25-M, Vol. 2, C18.2.2.

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- CSTC-A did not always send confirmation of its receipt of weapons to the supplying organizations.

Without detailed information about weapons shipments it was difficult for USASAC, Navy IPO, and CSTC-A to detect discrepancies, if any, between what weapons suppliers reported as shipped and those CSTC-A received.

According to CSTC-A, when weapons arrived at the Kabul Afghanistan International Airport, CSTC-A personnel typically identified and counted incoming pallets of weapons but did not count individual weapons or record serial numbers. CSTC-A then temporarily gave physical custody of the weapons to the Afghan National Army for unescorted transport from the airport to the central depots in Kabul. Because CSTC-A did not conduct physical inventory checks on weapons arriving at the airport, due to security concerns at that facility, CSTC-A had limited ability to ensure that weapons were not lost or stolen in transit to the depots.

After the Afghan National Army transported weapons to the central depots, CSTC-A did not document the transfer of title for weapons to ANSF. Since no Afghan officers were present at the depots to take possession of the weapons, CSTC-A personnel received the weapons and processed them into inventory for storage. Although Defense did not provide direction to CSTC-A on how and when to transfer title to ANSF, CSTC-A officials told us they considered title transfer to have occurred, without any formal documentation, when information about the weapons was typed into computer inventory systems at the central depots. In February 2008, a revision to DSCA's *Security Assistance Management Manual* called for U.S. government officials delivering equipment to a foreign nation under pseudo-FMS to keep documentation showing when, where, and to whom delivery was made and report this information to the military organization responsible for procurement.³⁶ CSTC-A officials told us that they were not certain whether this revised guidance applied to ANSF weapons and therefore have not provided any title transfer documentation to USASAC or Navy IPO, the procuring organizations. However, regardless of how and when title passed to ANSF and how title transfer was documented, because ANSF officials were not present at the depots to take possession, CSTC-A retained control and custody of the weapons at the depots.

³⁶DoD 5105.38-M, Chapter 5, Table C5.T5.

CSTC-A Did Not Maintain Inventory Controls or Adequate Security at Storage Depots

CSTC-A did not maintain complete and accurate inventory records for weapons at the central storage depots and allowed poor security to persist. Until July 2008, CSTC-A did not track all weapons at the depots by serial number or conduct routine physical inventories. Moreover, CSTC-A could not identify and respond to incidents of actual or potential compromise, including suspected pilferage, due to poor security and unreliable data systems. Specific gaps in accountability controls include the following:

- *Incomplete serial number recording.* For over 5 years, CSTC-A stored weapons in the central depots and distributed them to ANSF units without recording their serial numbers. In August 2007, nearly 10 months after CSTC-A's Commanding General mandated serial number control, CSTC-A began registering weapons by serial number as they were issued to ANSF units.³⁷ While this established some accountability at the point of distribution, thousands of weapons under CSTC-A control had no uniquely identifiable inventory record. CSTC-A initiated comprehensive serial number tracking in July 2008, recording the serial numbers of all weapons in inventory at that time and beginning to register additional weapons upon receipt at the central depots. Nonetheless, CSTC-A officials told us that staff shortages made serial number recording challenging.
- *Lack of physical inventories.* CSTC-A did not conduct its first full inventory of weapons in the central depots until June 2008. Without conducting regular physical inventories, it was difficult for CSTC-A to maintain accountability for weapons at the depots and detect weapons losses.
- *Poor security.* CSTC-A officials have reported concerns about the trustworthiness of Afghan contract staff and guards at the central depot that serves the Afghan National Army. We also observed deficiencies in facility security at this depot, including Afghan guards sleeping on duty and missing from their posts. Demonstrating the importance of conducting physical inventories, in June 2008, within 1 month of completing its first full weapons inventory, CSTC-A officials identified the theft of 47 pistols

³⁷In a November 2006 memorandum, the CSTC-A commanding general issued command guidance for fiscal year 2007, which stated, among other things, that "CSTC-A will not accept risk in... accountability of all equipment (to include issuing and serial number accountability) issued to the ANSF." The memo also established as a priority effort to "institute an accountability system throughout the [Afghan National Police] which ensures serial number accountability of all sensitive items and major end items and ensures that accountability of all equipment issued to the [police] (Total asset visibility and accountability)."

from this depot. CSTC-A officials also told us that a persistent lack of CSTC-A and responsible ANSF personnel at the central depots had increased the vulnerability of inventories to pilferage.

- *Unreliable inventory information systems.* The information systems CSTC-A uses for inventory management at the central depots are rudimentary and have introduced data reliability problems. CSTC-A officials told us that for items received before 2006, they had only “limited data” from manual records at the Afghan National Army central depot. In 2006, CSTC-A’s contractor installed a commercial-off-the-shelf inventory management database system. However, the system permits users to enter duplicate serial numbers, allowing data entry mistakes to compromise critical data. Furthermore, due to a limited number of user licenses, multiple users enter information using the same account, resulting in a loss of control and accountability for key inventory management records. CSTC-A also established an Excel spreadsheet record-keeping system in 2006 for the central depot where Afghan National Police weapons are stored. However, training of Afghan National Police personnel at that depot has not yet begun, and training Afghan National Army personnel in the use of depot information systems has been problematic due to illiteracy and a lack of basic math skills. In a report about operations at the central depot that serves the Afghan National Army, CSTC-A’s logistics training contractor noted that only “one in four [Afghan National Army personnel] have the basic education to operate either the manual or automated systems.”

Staffing and Other Management Challenges at Storage Depots Increased Weapons Vulnerability

According to CSTC-A, inadequate staffing of U.S. and Afghan personnel at the central storage depots along with persistent management concerns have contributed to the vulnerability of stored weapons to theft or misuse. Although CSTC-A originally envisioned that ANSF would assume responsibility for the majority of central depot operations, ANSF has not asserted ownership of the central depots as planned, leaving U.S. personnel to continue exercising control and custody over the stored weapons. In addition, CSTC-A officials told us this resulted in ambiguities regarding roles and responsibilities and increased risk to stored weapons supplies. Specific challenges in this area include the following.

- *Difficulty providing adequate U.S. staff to maintain full accountability.* CSTC-A officials told us that the increasing volumes of equipment moving through the central depots had compounded the management challenges they faced, which included insufficient U.S. personnel on site to keep up with the implementation of equipment accountability procedures. They specifically cited staff shortages as having limited CSTC-A’s capacity to

conduct full depot inventories, maintain security, and invest in the training of ANSF personnel.

- *Lack of accountable Afghan officers and staff.* CSTC-A accountability procedures call for ANSF officers to be on site at the central depots to take responsibility for ANSF property. However, according to CSTC-A, the Afghan ministries did not consider the central depots to be ANSF facilities, given the high level of CSTC-A control. Thus, ANSF was reluctant to participate in central depot operations and did not post any officers or sufficient Afghan staff to the depots. According to CSTC-A officials, these problems resulted in ambiguities regarding roles and responsibilities at the central depots and placed an increased burden on limited U.S. forces to fulfill mandatory accountability and security procedures.
- *Difficulties raising the capacity of ANSF depot personnel.* According to CSTC-A officials, efforts to develop the capabilities of ANSF personnel to manage the central depots have been hampered by the lack of basic education or skills among ANSF personnel and frequent turnover of Afghan staff. As of December 2008, no Afghan National Police personnel have been trained at the police depot. Contractors responsible for Afghan National Army equipment accountability training told us that their efforts have been hampered by the Afghans' reluctance to attend training and by a lack of basic literacy and math skills needed to carry out depot operations. CSTC-A officials also told us that their embedded military trainers were frequently unable to focus on training and mentoring at the Afghan National Army depot, given their operational imperatives.

Despite CSTC-A Training Efforts, ANSF Cannot Fully Safeguard and Account for Weapons

CSTC-A and State have deployed hundreds of U.S. military trainers and contract mentors to help ANSF units, among other things, establish and implement equipment accountability procedures. Although CSTC-A has instituted a system for U.S. and coalition military trainers to assess the logistics capacity of ANSF units, they have not always assessed equipment accountability capabilities specifically. However, as part of their reporting to CSTC-A and State, contract mentors have documented significant weaknesses in the capacity of ANSF units to safeguard and account for weapons. As a result, the weapons CSTC-A has provided are at serious risk of theft or loss. Furthermore, CSTC-A did not begin monitoring the end use of sensitive night vision devices until about 15 months after issuing them to Afghan National Army Units.

CSTC-A Has Sponsored Training for ANSF on Weapons Accountability

CSTC-A has recognized the critical need to develop ANSF units' capacity to account for weapons and other equipment issued to them. In February 2008, CSTC-A acknowledged that it was issuing equipment to Afghan National Police units before providing training on accountability practices and ensuring that effective controls were in place. In June 2008, Defense reported to the Congress that it was CSTC-A's policy not to issue equipment to ANSF units unless appropriate supply and accountability procedures were verified.³⁸

As of June 2008, CSTC-A employed over 250 U.S. military or coalition personnel and contractors to advise ANSF on logistics matters, including establishing and maintaining a system of accountability for weapons. CSTC-A has also helped the Afghan Ministries of Defense and Interior establish decrees, modeled after U.S. regulations, requiring ANSF units to adopt accountability procedures. These procedures include tracking weapons by serial number using a "property book" to record receipt and inventory information, and conducting routine physical inventories of weapons. CSTC-A and State, with support from their respective contractors, MPRI and DynCorp, have conducted training for Afghan National Army and Afghan National Police personnel on the implementation of these decrees.³⁹ CSTC-A has also assigned contract mentors and U.S. and coalition embedded trainers to work closely with property book officers and other logistics staff in ANSF units to improve accountability practices. In addition, State assigns contract mentors to monitor Afghan National Police units that have received accountability training. These mentors visit the units and evaluate, among other things, the implementation of basic accountability procedures and concepts, such as maintenance of property books and weapons storage rooms. We previously reported that Defense has cited significant shortfalls in the number of fielded embedded trainers and mentors as the primary impediment to advancing the capabilities of the Afghan Security Forces.⁴⁰ According to information provided by CSTC-A officials, as of December 2008, CSTC-A had only 64 percent of the 6,675 personnel it required to

³⁸See Department of Defense, Report to Congress in Accordance with 2008 National Defense Authorization Act (Section 1231, P.L. 110-181), *United States Plan for Sustaining the Afghanistan National Security Forces* (Washington, D.C.: June 2008), p. 13.

³⁹CSTC-A obtains MPRI's services through delivery orders issued under a contract between the U.S. Army Research, Development and Engineering Command Contracting Center and MPRI, Inc.

⁴⁰[GAO-08-661](#).

perform its mission overall and only about half of the 4,159 mentors it required.

CSTC-A Has Not Consistently Assessed ANSF Accountability Capacity, but Significant Weaknesses Have Been Reported

While CSTC-A has established a system for assessing the logistics capacity of ANSF units, it has not consistently assessed or verified ANSF's ability to properly account for weapons and other equipment.

- *Afghan National Army.* As Afghan National Army units achieve greater levels of capability, embedded U.S. and coalition military trainers are responsible for assessing and validating their progress.⁴¹ Trainers used various checklists in 2008 to assess and validate Afghan National Army units. One checklist we reviewed addressed seven dimensions of logistics capacity and performance, but did not specifically mention accountability for weapons or other equipment. The assessment category in the checklist most relevant to equipment accountability was a rating on whether a unit “understands the [the Ministry of Defense] logistical process and utilizes it with reasonable effectiveness.” Another checklist we reviewed addressed 15 dimensions of “sustainment operations” and was used to assess units’ overall demonstration of logistics management capacity and “ability to effectively receive, store, and issue supplies.” However, the checklist did not address weapons or equipment accountability specifically. Furthermore, more detailed notes accompanying the completed checklists we reviewed provided virtually no information on equipment accountability as a factor in the logistics ratings the CSTC-A training team assigned to the unit.
- *Afghan National Police.* CSTC-A has also introduced a monthly assessment tool to be used by its mentors to evaluate Afghan National Police capability and identify strengths and weaknesses.⁴² Prior to June 2008, CSTC-A did not specifically evaluate the capacity of police units to account for weapons and other equipment. CSTC-A changed the format of its police assessment checklist to specifically address four dimensions of equipment accountability. According to the reformatted assessments we reviewed, as of September 30, 2008, some trained and equipped Afghan

⁴¹However, as we reported in June 2008 (see [GAO-08-661](#)), the shortage of U.S. embedded trainers and coalition mentors assigned to Afghan National Army units delays this validation process and lengthens the amount of time it will take the Afghan National Army to achieve full capability.

⁴²However, as we reported in June 2008 (see [GAO-08-661](#)), CSTC-A identified extremely limited mentor coverage of the police as a significant challenge to using this tool to generate reliable assessments.

National Police units had not yet implemented accountability procedures required by the Afghan Ministry of Interior. These assessments indicated that of the first seven police districts to receive intensive training and weapons under CSTC-A's Focused District Development Program, which began in November 2007, two districts were not maintaining property accountability, including property books, and one was not conducting audits and physical inventories periodically or when directed.

Contract mentors employed by CSTC-A and State have reported extensively on weaknesses they observed in ANSF units' capacity to safeguard and account for weapons and other equipment. Reports we reviewed, prepared by MPRI and DynCorp mentors between October 2007 and August 2008, indicated that ANSF units throughout Afghanistan had not implemented the basic property accountability procedures required by the Afghan Ministries of Defense and Interior. Although these reports did not address accountability capacities in a consistent manner that would allow a systematic or comprehensive assessment of all units, they did highlight common problems relating to weapons accountability, including a lack of functioning property book operations and poor physical security.

- *Lack of functioning property book operations.* Mentors reported that many Afghan army and police units did not properly maintain property books, which are fundamental tools used to establish equipment accountability and are required by Afghan ministerial decrees. In a report dated March 2008, a MPRI mentor to the property book officer for one Afghan National Army unit stated, "for 3 years, the unit property books have not been established properly" and that "a lack of functionality existed in every property book operation." Another report, from March 2008, concluded, "equipment accountability and equipment maintainability is a big concern; equipment is often lost, damaged, or stolen, and the proper procedures are not followed to properly document and/or account for equipment." In a 2008 MPRI quarterly progress report on Afghan National Police in Kandahar, a mentor noted that property book items were issued but not posted to any records, because personnel did not know their duties and responsibilities. The report further states that "at present the property managers are not tracking any classes of supplies at all levels" and that "ANSF is very basic in its day to day function," exhibiting no consideration for property accountability.
- *Poor security.* MPRI reports also indicated that some Afghan National Police units did not have facilities adequate to ensure the physical security of weapons and protect them against theft in a high-risk environment. For example, a March 2008 MPRI report on Afghan National Police in one northern province stated that the arms room of the police district office was behind a wooden door and had only a miniature padlock, and that this

represented “basically the same austere conditions as in the other districts.”

Defense and State contractor reports identified various causes of ANSF accountability weaknesses, including illiteracy, corruption, desertion, and unclear guidance from Afghan ministries.

- *Illiteracy.* Mentors reported that widespread illiteracy among Afghan army and police personnel had substantially impaired equipment accountability. For instance, a March 2008 MPRI report on an Afghan National Army unit noted that illiteracy was directly interfering with the ability of supply section personnel to implement property accountability processes and procedures, despite repeated training efforts. In July 2008, a police mentor in the Zari district of Balkh province stated that, “a lack of personnel [at the district headquarters] who can read and write is hampering efficient operations,” and added that there is currently one literate person being mentored to take charge of logistics. In addition, an August 2008 DynCorp report on the Afghan National Police noted that in Kandahar, “concerns [have been] expressed over [the supply officer] maintaining control over the storage facility keys. He cannot read or write, does not record anything that is being given out or have a request form for supplies filled out. [He] is the same individual that was handing out automatic weapons to civilians the previous week.”
- *Corruption.* Reports of alleged theft and unauthorized resale of weapons are common. During 2008, DynCorp mentors reported multiple instances of Afghan National Police personnel, including an Afghan Border Police battalion commander in Khost province, allegedly selling weapons to anti-coalition forces. In a March 2008 report, mentors noted that despite repeated requests, the Afghan National Police Chief Logistical Officer for Paktika province would not produce a list of serial numbers for weapons on hand. The DynCorp mentors suggested this reluctance to share information could be part of an attempt to conceal inventory discrepancies. In addition, a May 2008 DynCorp report on police cited corruption in Helmand as that province’s most significant problem, noting that the logistics officer had been named in all allegations of theft, extortion, and deceit reported to mentors by their Afghan National Police contacts.
- *Desertion.* DynCorp mentors also reported cases of desertion in the Afghan National Police, which resulted in the loss of weapons. For instance, in July 2008, mentors reported that when Afghan Border Police officers at a Faryab province checkpoint deserted to ally themselves with anti-coalition forces, they took all their weapons and two vehicles with

them. Another DynCorp mentor team training police in Ghazni province reported in July 2008 that 65 Afghan National Police personnel had deserted and would not be coming to the base to be processed. The police officers that did arrive came without their issued weapons.

- *Unclear guidance.* MPRI mentors reported that Afghan ministry logistics policies were not always clear to Afghan army and police property managers. A MPRI report dated April 2008 stated that approved Ministry of Interior policies outlining material accountability procedures were not widely disseminated and many logistics officers did not recognize any of the logistical policies as rule. Additionally, a MPRI mentor to the Afghan National Army told us that despite the new decrees, Afghan National Army logistics officers often carried out property accountability functions using Soviet-style accounting methods and that the Ministry of Defense was still auditing army accounts against those defunct standards.

Senior Afghan Ministry of Defense officials we met with also described similar accountability weaknesses. In a written statement provided in response to our questions about Afghan National Army weapons accountability, the ministry officials indicated that soldiers deserting with their weapons had a negative effect on the Afghan National Army and reduced supplies on hand in units. They also indicated that Afghan National Army units in the provinces of Helmand, Kandahar, and Paktika have been particularly vulnerable to equipment theft.

CSTC-A Has Recently Begun Conducting End Use Monitoring of Weapons and Sensitive Night Vision Devices

According to DSCA officials, U.S.-procured weapons and sensitive equipment provided to ANSF are subject to end use monitoring, which is meant to provide reasonable assurances that ANSF is using the equipment for intended purposes. Under DSCA guidance, weapons are subject to routine end use monitoring, which, according to DSCA officials, entails making and recording observations on weapons usage in conjunction with other duties and during interactions with local defense officials. For specified sensitive defense items, such as night vision devices, DSCA guidance calls for additional controls and enhanced end use monitoring. This includes providing equipment delivery records with serial numbers to DSCA, conducting routine physical inventories, and reporting on quarterly inventory results. For night vision devices this also includes the establishment of a physical security and accountability control plan.

In July 2007, CSTC-A began issuing 2,410 night vision devices to Afghan National Army units without establishing the appropriate controls or conducting enhanced end use monitoring. According to U.S. Central Command, these devices pose a special danger to the public and U.S.

forces if in the wrong hands. DSCA did not ensure that CSTC-A followed the end use monitoring guidance because CSTC-A purchased these devices directly and without the knowledge or involvement of DSCA officials. To address this, DSCA and CSTC-A established procedures in April 2008 to prohibit CSTC-A's procurement of weapons and sensitive equipment in-country without DSCA involvement.

In May 2008, CSTC-A first developed an end use monitoring plan that established both routine and enhanced monitoring procedures. The plan calls for the use of U.S. trainers and mentors embedded in ANSF units to provide reasonable assurances that the recipients are complying with U.S. requirements on the use, transfer, and security of the items. CSTC-A informed us that it began implementing the plan in July 2008, but noted it did not have sufficient staff or mentors to conduct the monitoring envisioned. CSTC-A officials told us they started to conduct and document routine end use monitoring for weapons provided to the Afghan police in 31 of Afghanistan's 365 police districts.⁴³ CSTC-A had not been able to undertake any monitoring in the remaining 334 police districts due to security constraints.

During the course of our review, CSTC-A began following DSCA's enhanced end use monitoring guidance for the night vision devices it had issued. CSTC-A started conducting inventories of these devices in October 2008, about 15 months after it began issuing them, and plans to conduct full physical inventories by serial number quarterly. As of December 2008, CSTC-A had accounted for all but 10 of the devices it had issued.

DSCA and CSTC-A attributed this limited end use monitoring to a shortage of security assistance staff and expertise at CSTC-A, exacerbated by frequent CSTC-A staff rotations. Defense's Inspector General similarly reported in October 2008 that CSTC-A did not have sufficient personnel with the necessary security assistance skills and experience and that short tours of duty and different rotation policies among the military services hindered the execution of security assistance activities.⁴⁴ We also noted these problems in 2004, when we reported that the Office of Military Organization-Afghanistan, CSTC-A's predecessor, did not have adequate

⁴³CSTC-A has only been able to conduct routine end use monitoring in Afghan police districts where Focused District Development training has been provided. This training was initiated in November 2007 to address widespread corruption, lack of capacity, and inadequate training in the Afghan National Police.

⁴⁴SPO-2009-001, p. 32.

personnel trained in security assistance procedures to support its efforts and that frequent personnel rotations were limiting Defense's efforts to train key personnel in defense security assistance procedures and preserve institutional knowledge.⁴⁵ CSTC-A officials told us that the addition of a USASAC liaison to the CSTC-A staff in Kabul had helped to offset some of these challenges, as the liaison was knowledgeable in security assistance procedures and had been able to provide some basic training for CSTC-A staff.

Conclusions

Oversight and accountability for weapons is critical in high-threat environments, especially in Afghanistan, where potential theft and misuse of lethal equipment pose a significant danger to U.S. and coalition forces involved in security, stabilization, and reconstruction efforts. Because Defense organizations throughout the weapons supply chain have not had a common understanding of what procedures are necessary to safeguard and account for weapons, inventory records, including serial numbers, are not complete and accurate. As a result, Defense cannot be certain that weapons intended for ANSF have reached those forces. Further, weapons stored in poorly secured central depots are significantly vulnerable, and the United States has limited ability to detect the loss of these weapons without conducting routine inventories. Although CSTC-A established new weapons accountability procedures during the course of our review, it is not yet clear that, without a mandate from Defense and sufficient resources, CSTC-A will consistently implement these procedures. Because Afghan army and police units face significant challenges in controlling and accounting for weapons, it is essential that Defense enhance its efforts in working with ANSF units in this area. Systematically assessing ANSF's ability to implement required weapons accountability procedures is particularly important for gaining reasonable assurances that ANSF units are prepared to receive and safeguard weapons as well as for evaluating overall progress in developing ANSF's accountability capacity. Moreover, adequately monitoring night vision devices and other sensitive equipment after it is transferred to ANSF will help to ensure that such equipment is used for its intended purposes. As development of the Afghan security forces continues, it is vital that clear oversight and accountability mechanisms are in place to account for weapons and other sensitive equipment.

⁴⁵GAO, *Afghanistan Security: Efforts to Establish Army and Police Have Made Progress, but Future Plans Need to Be Better Defined*, [GAO-05-575](#) (Washington, D.C.: June 30, 2005).

Recommendations for Executive Action

To help ensure that the United States can account for weapons that it procures or receives from international donors for ANSF, we recommend that the Secretary of Defense establish clear accountability procedures for weapons in the control and custody of the United States, and direct USASAC, CSTC-A, and other military organizations involved in providing these weapons to (1) track all weapons by serial number and (2) conduct routine physical inventories.

To help ensure that ANSF units can safeguard and account for weapons and other sensitive equipment they receive from the United States and international donors, we recommend that the Secretary of Defense direct CSTC-A to (1) specifically and systematically assess the ability of each ANSF unit to safeguard and account for weapons in accordance with Afghan ministerial decrees and (2) explicitly verify that adequate safeguards and accountability procedures are in place, prior to providing weapons to ANSF units, unless a specific waiver or exception is granted based on due consideration of practicality, cost, and mission performance.

We also recommend that the Secretary of Defense devote the necessary resources to address the staffing shortages that hamper CSTC-A's efforts to train, mentor, and assess ANSF in equipment accountability matters.

Agency Comments and Our Evaluation

Defense provided written comments on a draft of this report (see app. IV). Defense concurred with our recommendations and provided additional information on its efforts to help ensure accountability for weapons intended for the ANSF. Defense also provided technical corrections, which we incorporated into the report as appropriate. State did not provide comments.

Defense concurred with our recommendation to establish clear accountability procedures for weapons intended for ANSF. It noted that Defense requirements and procedures exist for small arms tracking by serial number. However, Defense went on to state that DSCA, in conjunction with U.S. Central Command, has been directed to implement in Afghanistan congressionally-mandated controls that Defense is implementing in Iraq. These include (a) the registration of serial numbers of all small arms, (b) an end-use monitoring program for all lethal assistance, and (c) the maintenance of detailed records for all defense articles transferred to Afghanistan. As we indicated in our report, Defense organizations did not have a common understanding of whether existing accountability procedures applied to weapons obtained for ANSF, underscoring the importance of these controls. Defense did not state when these measures would be implemented; however, if Defense follows

through on these actions and, in addition, clearly requires routine inventories of weapons in U.S. custody and control, our concerns will be largely addressed.

Defense also concurred with our recommendation to systematically assess each ANSF unit's capacity to account for and safeguard weapons and to ensure that adequate procedures are in place prior to providing weapons. Defense indicated that embedded mentors and trainers are assessing ANSF units' accountability capacity. It also stated that for the Afghan National Army, weapons are only issued with coalition mentors present to provide oversight at all levels of command; and for the Afghan National Police, most weapons are currently being issued to selected units that have received focused training, including instruction on equipment accountability. We note that at the time of our review, ANSF unit assessments did not systematically address the units' capacity to safeguard and account for weapons in its possession. We also note that Defense has cited significant shortfalls in the number of personnel required to train and mentor ANSF units. Unless these matters are addressed, we are not confident the shortcomings we reported will be adequately addressed.

Finally, Defense also concurred with our recommendation that it address the staffing shortfalls that hamper CSTC-A's efforts to train, mentor, and assess ANSF in weapons accountability matters. Defense commented that it is looking into ways to address the shortages, but did not state how or when additional staffing would be provided.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Secretaries of Defense and State and interested congressional committees. The report will also be available at no charge on the GAO Web site at <http://www.gao.gov>. If you or your staff have any questions concerning this report, please contact me at (202) 512-7331 or johnsoncm@gao.gov.

Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix V.

A handwritten signature in black ink, appearing to read "Charles M. Johnson, Jr.", with a large, stylized flourish at the end.

Charles Michael Johnson, Jr., Director
International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

To determine whether Defense and the Combined Security Transition Command-Afghanistan (CSTC-A) could account for weapons obtained, transported, stored, and distributed to Afghan National Security Forces (ANSF), we conducted the following work.

- We sought to determine which Defense accountability procedures are generally applicable to Defense equipment by reviewing documents and meeting with officials from U.S. Central Command in Tampa, Florida; Defense Security Cooperation Agency (DSCA) and Defense's Office of Inspector General in Arlington, Virginia; and CSTC-A in Kabul, Afghanistan. We also reviewed relevant Defense regulations, instructions, and manuals.
- We compiled detailed information on 242,203 weapons the United States procured for ANSF and shipped to Afghanistan from December 2004 through June 2008. We identified the types, quantity, shipment dates, and cost of these weapons by reviewing and analyzing pseudo-FMS case documentation provided by DSCA and data provided by the U.S. Army Security Assistance Command (USASAC) in New Cumberland, Pennsylvania, and Navy IPO in Arlington, Virginia. To ensure we had a complete record of all weapons ordered and shipped during this time period, we checked USASAC and Navy shipment details against line-item details in Letters of Offer and Acceptance provided to us by DSCA. For each shipment of weapons we isolated in the USASAC and Navy International Programs Office (IPO) files, we compiled lists of serial numbers or determined the total number of weapons for which no serial number records were available. We identified 195,671 weapons for which USASAC and Navy IPO could provide serial numbers and 46,532 for which they could not. In some cases, quantities of weapons required by the Letter of Offer and Acceptance differed from those recorded as shipped; we followed up on these discrepancies with officials at USASAC, who explained that such differences were due to changes in market pricing between the time of the request and the time of purchase. We determined that the data were sufficiently reliable for the purposes of this report.
- To assess Defense's ability to account for the location or disposition of weapons, we selected a stratified random probability sample of 245 weapons from the population of 196,671 U.S.-procured weapons for which Defense could provide serial numbers. The sample population of weapons included all years in which U.S.-procured weapons had been shipped to ANSF and seven specific categories of weapons obtained. Our random sample did not include certain miscellaneous weapon types, which we categorized as "other." Each weapon in the population had a known probability of being included in our probability sample. We divided the

weapons into two strata, based on the format of the weapons lists we obtained. About half of the serial numbers were available to us in electronic databases, allowing us to select a simple random sample of 96 weapons from those records. The remaining 98,462 serial numbers were provided to us in paper lists or electronic scans of paper files. From those records we selected a random systematic sample of 149 weapons by choosing a random start and selecting every subsequent 679th serial number. Each weapon selected in the sample was weighted in the analysis to account statistically for all the weapons in the population, including those that were not selected. In Afghanistan, we attempted either to physically locate each weapon in our sample or obtain documentation confirming that CSTC-A had recorded its issuance to ANSF or otherwise disposed of it. We used the results of our work to generalize to the universe of weapons from which we drew our sample and derive an estimated number of weapons for which CSTC-A cannot provide information on location or disposition. Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn. Since each sample could have provided different estimates, we express our confidence in the precision of our results as a 95 percent confidence interval (e.g. plus or minus 5 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. As a result, we are 95 percent confident that each of the confidence intervals we have reported will include the true values in the study.

- We compiled detailed information on the approximately 135,000 weapons CSTC-A obtained for ANSF from international donors. We identified the estimated dollar values, types, quantities, and sources of these weapons by analyzing records from the office of CSTC-A's Deputy Commanding General for International Security Cooperation. We assessed the reliability of these data by interviewing CSTC-A officials knowledgeable about the data and by analyzing the records they provided to identify problems with completeness or accuracy. CSTC-A officials told us the dollar amounts they track for the value of weapons donations had been provided by the donors and were of questionable accuracy, as they had not been independently verified by CSTC-A. We also reviewed CSTC-A's records on the types, quantities, and sources of weapons donations. CSTC-A officials told us that due to a long-standing lack of accountability procedures for handling weapons donations received at the central storage depots, they had been unable to independently verify the quantities reported by donors. After our visit to Kabul, we continued to work closely with CSTC-A officials to identify additional data concerns. When we found discrepancies, such as data entry errors, we brought them to CSTC-A's attention and worked with its officials to correct the discrepancies, to the

extent that we could, before conducting our descriptive analyses. While CSTC-A's procedures for ensuring the accuracy of these data have improved during the past year, documentation on procedures was lacking prior to March 2007, which made it impossible for us to independently assess the data's accuracy. Because we still have concerns about the reliability of these data, we are only reporting them as background information and in an appendix to provide a sense of who donated the weapons and when.

- We documented weapons accountability practices and procedures by examining records and meeting with officials from DSCA, USASAC, Navy IPO, and CSTC-A—the organizations directly involved with obtaining, transporting, storing, and distributing weapons for ANSF. In Afghanistan, we observed weapons accountability practices at the Kabul Afghanistan International Airport and the two ANSF central storage depots in Kabul where weapons intended for the Afghan National Army and the Afghan National Police are stored before distribution to ANSF units. While at the central depots, we discussed weapons management with CSTC-A officials and mentors employed by MPRI, Defense's ANSF development contractor. We also observed depot operations, including security procedures, storage conditions, and inventory information systems. In addition, we examined weapons inventory records at CSTC-A headquarters in Kabul.
- We met with officials from Defense's Inspector General to discuss two audits it conducted during 2008 relating to weapons accountability in Afghanistan and reviewed a related report it issued in October 2008.

To assess the extent to which CSTC-A has ensured that ANSF can properly safeguard and account for weapons and other sensitive equipment issued to it, we conducted the following work.

- We obtained information on ANSF weapons accountability practices by meeting with cognizant officials from the Afghan Ministries of Defense and Interior. The Ministry of Defense also provided written responses to our questions on this subject. In addition, we reviewed ministerial decrees documenting equipment accountability requirements applicable to the Afghan National Army and Afghan National Police and discussed the development and the implementation status of those decrees with CSTC-A and MPRI.
- We obtained information on CSTC-A's efforts to train, mentor, and assess ANSF units on accountability for weapons and other equipment by reviewing documents and meeting with officials from CSTC-A and MPRI in Kabul. We reviewed all available weekly, monthly, quarterly, and ad hoc

reports submitted by MPRI logistics mentors from October 2007 to August 2008 that included observations regarding ANSF equipment accountability practices. We also reviewed all available reports, including checklists and assessment tools, prepared by CSTC-A's embedded military trainers to assess the logistics capabilities of Afghan army and police units. To gain a better understanding of ANSF weapons accountability practices and challenges, we visited an Afghan National Army commando unit near Kabul that had received weapons and night vision devices from CSTC-A and met with the unit's property book officer and MPRI mentors assigned to that unit. Due to travel restrictions imposed by CSTC-A based on heightened security threats during our visit to Afghanistan, we were unable to travel outside of the Kabul area, as planned, to visit other ANSF units in the country that had also received weapons from CSTC-A.

- We obtained information on State's efforts to ensure accountability for weapons provided to the Afghan National Police by reviewing documents and meeting with officials from the U.S. Embassy in Kabul and State's Bureau of International Narcotics and Law Enforcement Affairs in Washington, D.C. We also reviewed all weekly reports submitted to State between January and August 2008 by State's Afghan National Police development contractor, DynCorp, that included observations regarding police equipment accountability practices.
- We determined the end use monitoring procedures generally applicable to weapons transferred to foreign countries under Foreign Military Sales by reviewing DSCA's *Security Assistance Management Manual*. We sought clarification on this guidance and views on its applicability to U.S. procured weapons and internationally donated weapons in Afghanistan from officials at DSCA and U.S. Central Command.
- We determined end use monitoring policies and practices in Afghanistan by reviewing documents and meeting with officials from U.S. Central Command, CSTC-A, DSCA, and State. In Afghanistan, we met with officials in CSTC-A's Security Assistance Office, including the USASAC liaison to CSTC-A. We reviewed all available documentation of the end use monitoring CSTC-A had conducted as of December 2008 for weapons and other sensitive equipment, including night vision devices, provided to ANSF.

Appendix II: International Donations Obtained for ANSF by CSTC-A

Since June 2002, CSTC-A's office of the Deputy Commanding General for International Security Cooperation has vetted, tracked, and coordinated the delivery of weapons donated to ANSF by the international community. CSTC-A officials reported to us that they had obtained about 135,000 weapons for ANSF in this manner, though we were unable to independently confirm that figure. CSTC-A officials also told us they had not evaluated the reliability of the dollar values assigned by donors for these weapons and noted that some quantities may be overstated, as many of the donated weapons were damaged or unusable. (See table 1 for a summary of the data CSTC-A reported to us on weapons provided by international donors.)

Table 1: Quantities and Estimated Value of Weapons Provided by International Donors for ANSF (June 2002 through June 2008)

| Donor | Quantity | Donor-estimated value (Dollars in millions) |
|--------------|-----------------|--|
| Hungary | 46,944 | \$16.5 |
| Egypt | 17,199 | 5.5 |
| Slovenia | 12,033 | 5.0 |
| Romania | 11,390 | 7.6 |
| Lithuania | 10,000 | 3.3 |
| Germany | 10,000 | 2.5 |
| Bosnia | 4,930 | 2.9 |
| Turkey | 4,088 | 8.4 |
| Estonia | 4,000 | 1.3 |
| India | 3,864 | 31.1 |
| Canada | 2,500 | 2.0 |
| Montenegro | 1,600 | 0.8 |
| Slovakia | 1,524 | 3.4 |
| Bulgaria | 1,224 | 3.1 |
| Croatia | 1,012 | 0.3 |
| Albania | 918 | 0.5 |
| Pakistan | 801 | 1.9 |
| Ukraine | 666 | 0.4 |
| Greece | 300 | 0.1 |
| Spain | 259 | 6.0 |
| Poland | 108 | \$0.1 |
| Total | 135,360 | \$102.8 |

Source: GAO analysis of CSTC-A data.

While CSTC-A's procedures for ensuring the accuracy of these data have improved during the past year, documentation was lacking prior to March 2007, which made it impossible for us to independently assess the data's accuracy. Because we have concerns about the reliability of these data, we are only reporting them here to provide a sense of who donated the weapons.

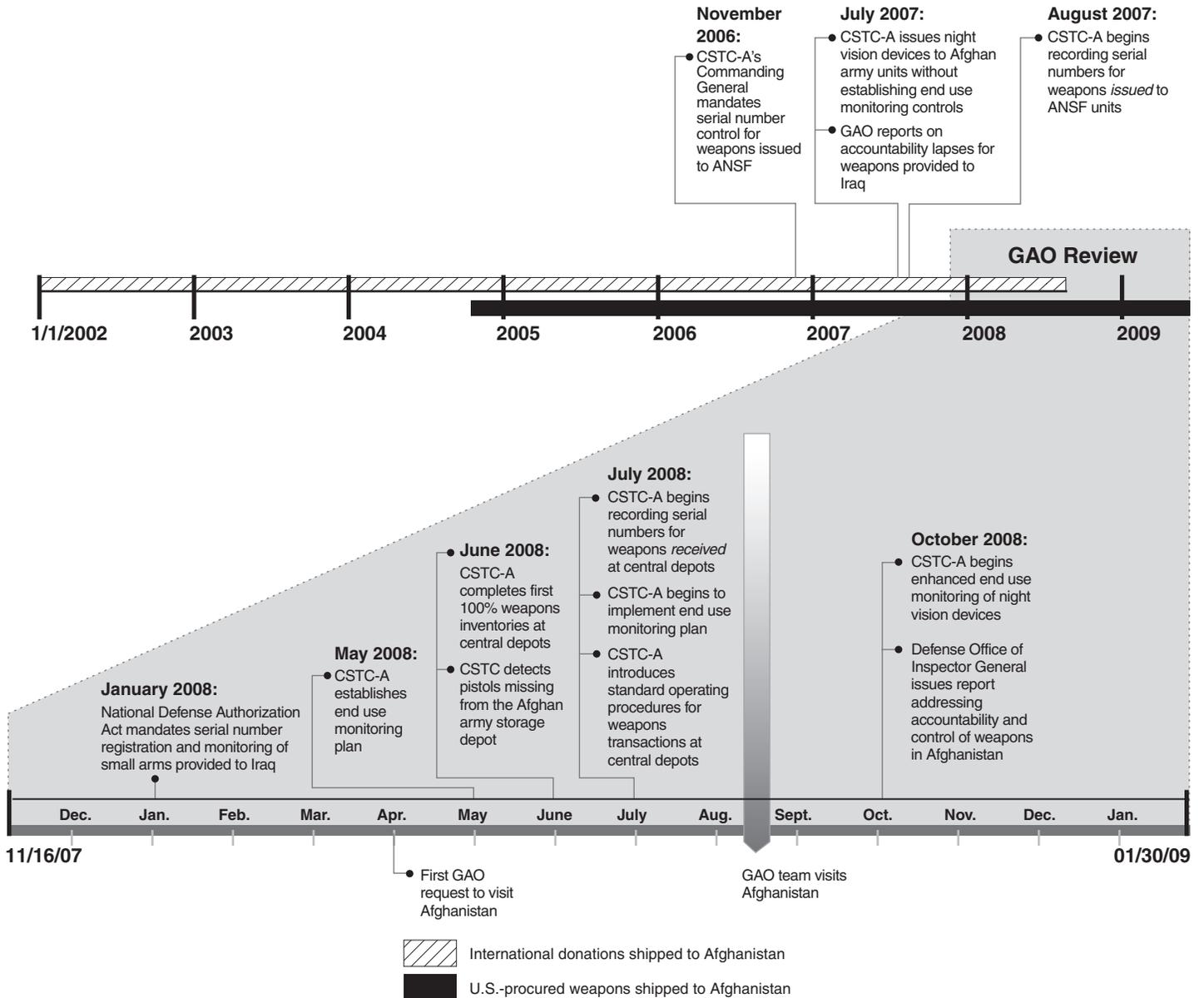
Included in CSTC-A's records were details indicating that weapons donations have included rifles, pistols, light and heavy machine guns, grenade launchers, rocket-propelled grenade launchers, and mortars. According to this information, about 79 percent of the weapons donated were AK-47 assault rifles.

Appendix III: Timeline of Key Weapons Accountability Events

Since international donors began providing weapons for ANSF in June 2002, CSTC-A and others have taken a variety of steps to improve accountability. Many of these steps occurred during the course of our review. Figure 4 provides a timeline of key events relating to accountability for ANSF weapons and other sensitive equipment.

Appendix III: Timeline of Key Weapons Accountability Events

Figure 4: Timeline of Key Events Relating to Accountability for ANSF Weapons and Other Sensitive Equipment (June 2002 to January 2009)



Source: GAO analysis of information provided by Defense and CSTC-A.

Appendix IV: Comments from the Department of Defense

Although the comments the Department of Defense provided to us were undated, we received them on January 23, 2009.



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SECURITY AFFAIRS

ASSISTANT SECRETARY OF DEFENSE

2700 DEFENSE PENTAGON
WASHINGTON, DC 20301-2700

Mr. Charles Johnson Jr.
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Mr. Johnson:

The following are Department of Defense (DoD) comments to the GAO draft report (GAO-09-267), "AFGHANISTAN SECURITY: Lack of Systematic Tracking Raises significant Accountability Concerns about Weapons Provided to Afghan National Security Forces," dated 24 December, 2008 (GAO Code 320556). DoD Comments are directed towards the draft report's three recommendations.

RECOMMENDATION 1: The GAO recommended that the Secretary of Defense establish clear accountability procedures for weapons in the control and custody of the United States, and direct U.S. Army Security Assistance Command (USASAC), Combined Security Transition Command-Afghanistan (CSTC-A), and other military organizations involved in providing these weapons to (1) track all weapons by serial number and (2) control routine physical inventory. (p. 22/GAO Draft Report)

DOD RESPONSE: DoD concurs with the recommendation, although notes that accountability requirements and procedures for small arms tracking and accountability currently exist in the Defense Logistics Management System Manual (DoD 4000.25-M Volume 2) and the U.S. Army's Inventory Management Asset and Transaction Reporting System Regulation (AR 710-3). These instructions delineate the requirement to enter the serial number of any weapon (standard and non-standard) into the DoD Small Arms Serialization Program.

DoD has also taken measures to establish a clear directive on weapons accountability in Afghanistan. The Defense Security Cooperation Agency, in conjunction with U.S. Central Command and the military departments, has been directed to implement in Afghanistan the best practices of section 1228 (b) of the National Defense Authorization Act for Fiscal Year 2008, Public Law 110-181 (NDAA) which lays out controls for Iraq.



These include:

1. The registration of the serial numbers of all small arms to be provided to the Islamic Government of Afghanistan or to other groups, organizations, citizens, or residents of Afghanistan;
2. A program of end-use monitoring of all lethal defense articles provided to such entities or individuals; and
3. The maintenance of detailed record of the origin, shipping, and distribution of all defense articles transferred under the Afghanistan Security Forces Fund or other security assistance program to such entities or individuals.

DoD also notes that as a result of guidance issued by CENTCOM in July 2008, CSTC-A currently tracks serial numbers of all U.S. procured and internationally donated weapons per guidance in DOD regulation 4000.25-2-M (C18.7.4.3). Routine inventories are conducted by the U.S. military forces at the national, depot, and unit levels. Units with no coalition members present conduct monthly inventories that are reported to CSTC-A through a training readiness report. Afghan National Army leadership has confirmed that they have performed 100% physical serial number inventories of weapons annually and the Afghan National Police is currently in the process of conducting their first 100% weapon inventory.

The U.S. military forces also use the same measures to ensure accountability of weapons donated by other countries when we have visibility of them.

RECOMMENDATION 2: The GAO recommended that the Secretary of Defense direct CSTC-A to:

1. specifically and systematically assess the ability of each Afghan National Security Forces (ANSF) unit to safeguard and account for weapons in accordance with Afghan ministerial decrees; and
2. explicitly verify that adequate safeguards and accountability procedures are in place, prior to providing weapons to ANSF units, unless a specific waiver or exception is granted based on due consideration of practicality, cost, and mission performance. (p. 22/GAO Draft Report)

DOD RESPONSE: DoD concurs with the recommendation. As stated in the report, as of June 2008 CSTC-A has assisted the Afghan Ministries of Defense and Interior establish decrees requiring the Afghans to adopt accountability procedures and direct who is accountable for weapons at all levels of the command. DoD also notes that CSTC-A uses mentors and embedded training teams to assess the ability of the ANSF units to safeguard and account for weapons as established in accordance with Afghan Ministerial decrees. For the Afghan National Army, weapons are only issued with Coalition mentors present who provide oversight at all level of command. For the Afghan National Police

most weapons are being issued through the Focused District Development (FDD) and the Focused Border Development (FBD) programs. The FDD and FBD programs ensure that the weapons are properly issued and that training is done on property accountability and sensitive items. CSTC-A issues weapons to police outside of these venues including the Crises Response Unit and the Counter Narcotic Unit which both have mentors to oversee these processes

RECOMMENDATION 3: The GAO recommended that the Secretary of Defense devote the necessary resources to address the staffing shortages that hamper CSTC-A's efforts to train, mentor, and assess ANSF in equipment accountability matters. (p. 22/GAO Draft Report)

DOD RESPONSE: DoD concurs with the comment and is looking at ways to address these shortfalls.

My point of contact is Ms. Cara Negrette, (703) 695-2859, or email: cara.negrette@osd.mil.

Sincerely,



Mitchell Shivers
Acting

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Charles Michael Johnson, Jr., (202) 512-7331 or johnsoncm@gao.gov.

Staff Acknowledgments

Key contributors to this report include Albert H. Huntington III, Assistant Director; James B. Michels; Emily Rachman; Mattias Fenton; James Ashley; Mary Moutsos; Joseph Carney; Etana Finkler; Jena Sinkfield; and Richard Brown.

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