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**United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General**

Report of Inspection

Bureau of Administration Office of Language Services

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KEY JUDGMENTS

- * The Office of Language Services (LS) in the Bureau of Administration (A) effectively delivers timely, world-class interpreting and translating services to the President, cabinet-level officers, federal agencies, and the District of Columbia courts.
- * The employees and contractors in LS rank among the world's top interpreters and translators. In addition to an exceptional knowledge of English and a foreign language, LS interpreters must also have the poise and self-confidence to stand before the world's press. Although less publicly visible, LS translators must be able to efficiently and accurately convey the meaning of the written word in different languages.
- * The U.S. government communicates orally on complex issues with people from all over the world whose languages and modes of reasoning differ from ours. LS professional standards require that interpreters understand and study policy issues ahead of time. Department of State (Department) and other agency officials risk being misunderstood and embarrassed by failing to work appropriately with interpreters, that is, by making avoidable last-minute requests for interpreting services, neglecting to share briefing papers in advance, and failing to include interpreters in substantive meetings.
- * The most significant challenge facing LS is recruiting a pool of direct-hire employees and contractors who are among the world's best interpreters and translators. However, the Office of Personnel Management's (OPM) applicant rating procedures and stringent security clearance requirements have hindered the recruitment of direct-hire employees.

The inspection took place in Washington, DC, between March 24 and May 15, 2006. Bohdan Dmytrewycz (team leader), Arne B. Baker, Linda E. Erskine, and Frances T. Jones conducted the inspection.

CONTEXT

LS is charged with providing the highest quality interpreting and translating services to senior U.S. government officials, including the President, Secretary of State, and cabinet secretaries. Interpreters accompany the President on official travel, interpret the phone calls of high-level officials, and facilitate communication at conferences and negotiations. Translators provide, under tight deadlines, precise translations of technical documents, including treaties and agreements signed by representatives of the U.S. government.

The office is organized into four work groups: the Interpreting Division, the Translating Division, the Interpreter Assigning Unit, and the Administrative Unit. In addition to providing services to high-level U.S. government officials, the office also supports bureaus and offices in the Department and many clients from other agencies. These include domestic agencies, such as the Department of Housing and Urban Development and the District of Columbia courts, as well as agencies with foreign affairs responsibilities.

Office staffing consists of 42 direct-hire positions, eight contractors, and two part-time, intermittent employees. In addition, the office maintains a roster of approximately 1,200 contract interpreters and translators in over 40 languages. The office's budget for FY 2005 was slightly more than \$16.5 million, excluding salaries. LS operates under regulations contained in 1 Foreign Affairs Manual 213.

EXECUTIVE DIRECTION

LS is headed by an office director who reports to the deputy assistant secretary for operations in the Bureau of Administration. The director has an excellent relationship with Bureau of Administration management and has wide latitude to run the office. The Office of Inspector General (OIG) found the director, though an administrator rather than a linguist, to be very capable and knowledgeable. She maintains a cordial, effective office atmosphere with high morale. This situation contrasts with the office problems cited in OIG's 1993 inspection of the Bureau of Administration (ISP/I-94-05). Indeed, most of the corrective actions taken in response to that inspection were implemented under the director's tenure.

OIG found several organizational weaknesses that, if corrected, would improve an already well functioning office. First, the office needs to identify a recognized deputy or someone with clear authority who can act in the absence of the director. Furthermore, too many people report directly to the office director. For example, most of the Administrative Unit's staff reports directly to her, bypassing a capable administrative officer. This structure inhibits clear lines of responsibility and serves no useful purpose. In addition, there is no mechanism to develop a successor for the office director, whose job is complex and has a long learning curve. OIG informally recommended that the office restructure management supervision responsibilities for the Administrative Unit and take steps to assist in developing the leadership potential of senior managers in the office.

PROGRAM AND POLICY IMPLEMENTATION

INTERPRETING DIVISION

Two chief interpreters direct the Interpreting Division; one is responsible for European languages and the other for Eurasian and non-European languages. Between them they supervise 13 staff interpreters and oversee the assigning of several hundred contract interpreters. All of the division's interpreters are "conference level" interpreters, the highest level, which means they are able to orally render a message from one language into another naturally and fluently, while adopting the delivery, tone, and convictions of the speaker in the first person form of address.

The division's direct-hire interpreters work with officials at the highest levels of government, and most of them have other responsibilities as well. Four interpreters serve as assigning officers for contractors; eight assist the Translating Division with translations of documents and reviews of translations done by others; four participate in contractor training; and almost all participate in testing interpreter candidates. Morale in the Interpreting Division is high, and its employees characterize the chief interpreters as strong leaders and managers. LS interpreters are talented professionals who routinely accept frequent travel, abrupt changes in schedule, assignments on weekends and at odd hours, and long hours of study in preparation for their tasks.

A distinguishing feature of LS interpreters is their knowledge of substantive issues. One senior interpreter's expertise in Israeli-Palestinian issues led to his being given an office in the Bureau of Near Eastern Affairs and the role and title of advisor.

Clients, including the White House, praise the high quality and reliability of LS interpreters. They also appreciate the benefits of continuity. The same staff and contract interpreters provide services year after year, bringing historical perspective to the job. Foreign interlocutors recognize and trust LS interpreters, making discussions and negotiations easier.

EFFECTIVE USE OF INTERPRETER SERVICES

“If your interpreter doesn’t look good, you don’t look good.”
--News from the Front (November-December 2003, Center for Army Lessons Learned).

LS fights an uphill battle to get officials of the Department and other agencies to use interpreters effectively. Most U.S. government employees do not understand the nature of interpreting and the requirements of interpreters. Few government officials even know that the office exists and that its well-educated interpreters are U.S. citizens with Top Secret clearances. Few officials are aware that it is rarely possible without preparation to convert English into polished Arabic, for example, or that, while working, interpreters expend enormous mental effort thinking simultaneously in two tracks about complex issues. As a result, offices make last minute requests for interpreting services, neglect to share briefing papers in advance, forget to include interpreters in substantive meetings (or decide to exclude them because they are viewed as outsiders), and do not build in recovery time when scheduling interpreters for events that include long airplane flights. Interpreters need to be fully briefed on the policy agenda under discussion, even if circumstances preclude their participation in certain meetings.

This lack of understanding leads to mistakes that embarrass U.S. government officials or place them in a disadvantageous position in negotiating with foreign counterparts. Interpreters enable the United States to communicate with the rest of the world and convert carefully crafted English speech into foreign words that most exactly convey the intended meaning. Therefore, it makes sense that interpreters’ requirements are attended to.

Conference-level interpreting is a specialized field and has few practitioners worldwide. LS, therefore, must retain the best interpreters and use them effectively in today’s globalized world, where the topics discussed between governments are increasingly complicated. LS and the Bureau of Administration need to establish, communicate, and review on a regular basis the guidelines for the successful use of interpreters.

Recommendation 1: The Bureau of Administration should prepare written guidelines for the use of interpreters and establish a procedure for sending the guidelines to clients each time a client requests interpreting services. (Action: A)

Recommendation 2: The Bureau of Administration should establish internal procedures for obtaining interpreters' feedback on how closely clients adhered to the guidelines and follow up with clients to encourage more effective use of interpreters. (Action: A)

INTERPRETER ASSIGNING UNIT

The Interpreter Assigning Unit has nine direct-hire employees and one contractor. The unit assigns work to contract interpreters, records billing data, collects fiscal data from consumers, and controls quality. Most assigning officers assign only escort-level and seminar-level interpreters - levels below conference level - for their largest clients. These clients are the International Visitors Program, the Anti-Terrorism Assistance Program, and the International Law Enforcement Academy. Two of the unit's assigning officers are detailed to work directly with the chief interpreters to handle administrative and logistical aspects of assigning conference-level interpreters. All nine officers function as contracting officer's representatives. The chief of the Translating Division and his staff of three assigning officers separately manage outside contracting for translation services.

TRANSLATING DIVISION

Customers in the Department and other agencies interviewed by OIG offered nearly universal praise for the timeliness, quality, and accuracy of the work performed by the Translating Division. Arabic translations are a problem area, reflecting the difficulty that the office faces in recruiting highly skilled translators who are eligible for security clearances. The Translating Division is organized into two units, the Romance Branch (for French, Spanish, Italian, and Portuguese), and the General Branch (for Russian, Arabic, German, and Ukrainian). The division chief has extensive experience as a professional translator and has a reputation as an excellent manager. Staff morale is high and work processes are managed efficiently.

The Translating Division has 18 direct-hire employees, one part-time, intermittent employee, two contractors, and approximately 315 contract translators. The division is responsible for translating a broad range of materials for the White House, the Secretary, and other agencies. The division's translators also prepare treaty com-

parison memoranda to make sure that texts are in exact conformity with each other and that the foreign language text is in substantive agreement with the English text. LS assigns its most experienced direct-hire translators to prepare treaty conformity memoranda and has developed extensive written guidance and standard operating procedures for this important task. Officials from the Office of the Legal Adviser expressed satisfaction with the quality and timeliness of translations provided by LS, even for projects prepared under short deadlines.

ARABIC LANGUAGE TRANSLATIONS

LS does not have sufficient direct-hire or contractor staff resources for Arabic. As a result, internal review procedures developed to ensure high-quality products for other languages are not applied to Arabic translations. LS generally follows quality control practices such as assigning reviewers to translation projects, having translators translate primarily into their native languages, and providing written quality review comments to contractors. LS also administers a rigorous testing program to ensure that translators possess the requisite translating skills.

However, the work of LS's sole direct-hire Arabic translator is not reviewed by a second reader, even for high-profile projects such as correspondence for the President. The risk of a typographical or substantive error in translation is higher in the absence of a review process. Moreover, because of staffing shortfalls, the Arabic translator sometimes must serve as an interpreter, which reduces her availability to translate Arabic documents. The Arabic translator routinely translates from Arabic into English, although she is a native Arabic speaker, and the office's standard practice is to avoid assigning projects to translators in which they would translate into other than their native language. The recent hiring of an Arabic interpreter, who also assists with translation projects, has helped in the short term.

Contractor performance for some Arabic translation projects is substandard. Recently, a high-profile Department report had to be returned to a contractor for extensive revisions. Poor-quality contractor work also requires more oversight from the Arabic translator, further reducing the time she can devote to translation work. In sum, the lack of highly qualified Arabic language specialists has hampered the ability of the U.S. government to communicate accurately with the Arabic-speaking world. Employee recruitment issues are discussed in more detail in the Resource Management section of this report.

Although the office has an extensive outreach program for professional associations, universities, and translation centers, LS could employ other strategies to strengthen its Arabic language cadre. These additional approaches might expand the pool of qualified candidates and allow the office to institute needed quality control processes for Arabic translations. The potential negative consequences for U.S. foreign policy and public diplomacy require that the Bureau of Administration and LS redouble their efforts to recruit quality Arabic language translators.

Additional steps that could bolster recruitment of Arabic language translators include:

- * Partnerships with the Department's Arabic language school in Tunisia and with U.S. embassies in the Middle East to identify competent embassy translators;
- * Performance-based contract incentives, such as a monetary bonus for meeting quality standards over a sustained period or a higher schedule of payments for translation reviews;
- * Recruitment and retention allowances of up to 25 percent of base salary and use of the Student Loan Repayment Program for desired candidates;
- * Nonmonetary incentives such as training, sabbaticals, conference travel, telecommuting, or flexible work schedules;
- * An external LS web site for recruiting prospective language specialists.

Recommendation 3: The Bureau of Administration should develop and implement a strategy for improving the quality of Arabic translations that incorporates monetary and nonmonetary performance incentives and additional recruiting outreach. (Action: A)

DEMARCHE TRANSLATION WEBSITE

In 2005, LS instituted a new, web-based service to streamline translation of worldwide demarches into Arabic, French, Portuguese, Russian, and Spanish. The program is intended to reduce the workload at overseas missions and to avoid duplication of effort through centralized demarche translation. In 2005, the office

translated 236 demarches from 16 Department bureaus. With few exceptions, all demarches are translated within 48 hours of receipt. At the time of the inspection, the office was preparing to launch a completely restructured web site to make its features more user friendly and transparent.

TERMINOLOGIST POSITION

Translators have unique administrative support requirements that are not usually found in the federal government. For example, translators require dictionaries, foreign language keyboards, subject-specific databases, customized alphabet sets, and electronic glossaries. Since the departure of a contractor who had many years of experience, LS has struggled to meet the specialized support needs of its translators. For example, an industry-standard glossary program has not functioned properly for several months. Although some of this workload is related to information systems, the job performed by the former contractor requires specialized knowledge of the translating field. Some translating organizations employ terminologists to maintain and distribute officially approved glossaries for use by all translating staff. Such glossaries can be especially valuable to contractors and new employees who are unfamiliar with the specialized vocabulary used in certain fields. OIG informally recommended that LS establish a terminologist position to collect, maintain, and distribute electronic glossaries to direct-hire employees and contractor staff.

RESOURCE MANAGEMENT

ADMINISTRATIVE OPERATIONS

LS staff includes 42 direct-hire employees, two part-time, intermittent employees, and eight contractor support staff. In FY 2005, the office managed a budget of \$787,100 in appropriated funds and \$15.8 million in reimbursed monies, including interagency funds received from a 15-percent administrative charge imposed for contract management. The office reimburses the Department's American salaries account with approximately \$1.8 million for 28 staff positions. The office director oversees a roster of approximately 1,200 freelance interpreters and translator contractors.

The Office of the Executive Director in the Bureau of Administration (A/EX) provides most of LS's administrative services. LS management is satisfied with this support but believes that more interest could be shown in the areas of personnel staffing and information systems support. Scores on OIG's management operations questionnaire are above average in most categories. Morale in the office is also above average. A small administrative unit of five direct-hire employees, a part-time, intermittent employee, and five contractors supports small-scale purchases and travel and provides receptionist service. The Administrative Unit's primary functions are managing interagency reimbursements and contracting.

Although LS is permitted under Federal Acquisition Regulation, Part 17.505(d) to charge other agencies for its actual costs in administering Economy Act (31 U.S.C. 1535) interagency contracts, the office has not calculated its costs since 1995. Administrative costs may have increased since 1995. OIG informally recommended that the office recalculate the charge to reflect current administrative costs.

RECRUITMENT

The most important challenge facing LS is recruiting direct-hire employees and establishing a pool of contractors who are fully qualified to provide language services to government officials at the highest levels. The office plans for current and

future language requirements and then develops its staff and contractor talents to meet those requirements. Potential candidates must submit to an extensive security clearance process because their work involves matters of national security sensitivity. All too often, candidates with the requisite skills cannot obtain a security clearance. Finding potential candidates is a challenge because there are limited commercial and public sector sources from which LS can recruit, particularly in languages of limited diffusion. (Languages of limited diffusion are those languages, other than world languages or European languages, for which there is little commercial demand for interpreting and translating services. Examples are Cambodian, Swahili, or Quechua.)

LS believes that the key to successful operations is the identification, hiring, and professional development of its direct-hire staff interpreters and translators. Staffing decisions are made to replace or expand staff as customer demand for language services changes. The office tries to fill staff positions with highly qualified professionals who are versatile and can be assigned as interpreters or translators. The office also has established Civil Service career ladder positions at higher pay grade levels to provide applicants with long-term career opportunities.

LS has been frustrated by problems in recruiting and testing candidates for direct-hire staff positions. Over the past few years, OPM's certificates of eligible applicants have been inadequate and problematic. OPM requires applicants for a translating position to complete a self-evaluation of their skill levels, and it relies heavily on these self-evaluations to rate and rank applicants on the certificates. Native-speaker language proficiency alone is insufficient to ensure success as a professional interpreter or translator. LS believes that external applicants do not understand the complexity of diplomatic interpreting and translating and, therefore, tend to inflate their self-assessments. Conversely, contractors on the LS roster know the difficulties of the work and sometimes under-rate their abilities. Less than two percent of applicants for Arabic interpreting positions meet LS's standards, for example. The result is that the names listed at the top of the OPM certificate often cannot pass LS's interpreting and translating examinations. To overcome this problem, LS is seeking direct-hire authority from OPM so that it will be able to identify the best-qualified candidates for jobs that OPM determines have a severe shortage or a critical hiring need.

A draft letter requesting direct-hire authority from OPM is being reviewed by A/EX and will then need to be cleared by the Bureau of Human Resources. LS's difficulties in identifying qualified language specialists are well documented. The findings of the Interagency Language Roundtable, an organization established to coordinate and share information about federal foreign language issues, support the request to OPM. The roundtable identified a number of problems that federal employers con-

front in recruiting qualified language specialists. These include an inability to match salary and benefit packages offered by international organizations and private firms, the ineligibility of many individuals to obtain security clearances, and a highly competitive market in which demand exceeds supply for qualified candidates in certain languages. If LS receives direct-hire authority, it could screen all candidates' applications to identify the best qualified candidates for certificates of eligibles. It could also schedule testing without reference to OPM's 30-day hiring window. LS should have a more active role in screening applications as well as sufficient time to conduct necessary testing. Direct-hire authority would give LS the hiring flexibility it needs to meet the sensitive, high-level language services requirements of senior government officials. To become a more competitive employer, LS is presently using retention allowances for some language specialists who are being aggressively recruited with more lucrative offers from private industry.

TESTING AND TRAINING

LS received delegated testing authority from OPM in 1988. This authority allows the office to test the interpreting and translating skills of direct-hire and contractor applicants, using uniform testing standards set by LS. Under this process, interpreting and translating tests are reviewed by two LS employees. The tests contain a range of materials that is broadly reflective of the competencies necessary to perform successfully as an interpreter or translator. Recently, the office reviewed testing procedures to ensure that they are fair and consistent and that testing produced candidates capable of performing the demanding responsibilities of LS employees. The review was initiated when several candidates at the top of the OPM certificates of eligible applicants failed to pass LS testing, raising questions about the effectiveness of OPM's candidate-rating process.

To address the need for interpreters and translators for difficult-to-staff languages, such as Arabic, Turkish, and Haitian Creole, LS has developed training programs, and conducts about 10 training courses a year for potential applicants. The office also offers special courses for contractors to improve their skills and prepare them for more challenging assignments.

INFORMATION MANAGEMENT

Information technology (IT) support services are in a state of flux. LS receives its IT services and support from A/EX, and the management of its information

systems support scored slightly below average on OIG's questionnaire. One reason for this was a gap in finding an IT employee to fill a vacancy; another reason was that software programs are written in about 30 foreign languages, and supporting these programs requires assistance from language specialists who know about computers. In addition, network security procedures require lengthy IT security reviews before commercial, off-the-shelf software can be installed. Despite these complaints, LS is satisfied with its IT support.

The staff contractor who supported the office's specialized IT language requirements recently left that job. The office's administrative officer develops IT support requirements for equipment and software, and A/EX handles IT maintenance and implementation. Several staff language specialists keep abreast of new language tools and software programs and work with A/EX to identify programs that might be useful. An A/EX employee is onsite one day a week or more often, when requested. This arrangement works in the short term, but long-term IT requirements still need to be addressed. The IT contractor had developed skills over many years of working with LS, and these are not easy to replace. The office director has visited language schools to find a replacement with similar skills, but has had no success. She did identify an intern with good IT skills, a potential candidate who can be trained on the job in the highly specialized skills required.

LANGUAGE SERVICES ELECTRONIC APPLICATIONS

The office has developed several custom software applications to support its administrative requirements. The principal software system is the Language Services Job Tracker, a database for interpreting and translating projects. A newly developed module of the job-tracking program is LS Test Tracker, which records and tracks the entire job applicant testing process. Another program, LS View, stores and tracks contractor data. All three programs are connected and use the same database. The job-tracking program is constantly being updated and modified as staff members find the time to take advantage of its capabilities. The office also supports a web-based demarche program that places translations on the Department's OpenNet Plus network for access by embassies worldwide. However, users of the different software programs must deal with changing requirements. Nonetheless, day-to-day problems are worked out satisfactorily between A/EX and LS, and A/EX has suggested that one or two employees in LS be trained to use the database system and security access module.

The office is exploring options for an Internet web site, and the office director believes that the office needs an Internet portal, through which the public and contractors on the LS roster can be kept informed of procedural changes, office policies, and news of general interest. Discussions are underway about ways to set up a web site and to meet Department security regulations for public web sites. A/EX is working on proposals and cost estimates for budget-planning purposes.

CONTRACT MANAGEMENT

LS oversees a roster of approximately 1,200 contract interpreters and translators who provide language services to the U.S. government under the terms of basic ordering agreements. The office director has a contracting warrant authorizing acquisitions up to \$100,000 per transaction.

Under Department of State Acquisition Regulation 601.603-70b, LS has authority to contract for interpreting, translating, conference reporting, and for related language support and escort services. Moreover, procurement regulations at 14 FAM 221.4 require, at a minimum, that LS approve translating and interpreting services, except for translating for the Bureau of International Information Programs. Furthermore, 1 FAM 213.4.c describes the duties and responsibilities of LS for developing and implementing policies, standards, and procedures for testing, hiring, training, and evaluating the work of contract interpreters, contract translators, and other language support personnel.

These regulations do not apply to grants, however. For instance, the Bureau of Diplomatic Security has awarded grants to pay for language services provided to some of its security training programs. It did so without review from LS, although a prudent grant manager should seek first LS's determination of the ability of a grantee to perform the required work. This exemption from LS review allows grants officers to circumvent LS as a required supplier for language services. OIG informally recommended that the Bureau of Administration assess whether LS should be required to review grants that include language services, as it now does for contracts.

FORMAL RECOMMENDATIONS

Recommendation 1: The Bureau of Administration should prepare written guidelines for the use of interpreters and establish a procedure for sending the guidelines to clients each time a client requests interpreting services. (Action: A)

Recommendation 2: The Bureau of Administration should establish internal procedures for obtaining interpreters' feedback on how closely clients adhered to the guidelines and follow up with clients to encourage more effective use of interpreters. (Action: A)

Recommendation 3: The Bureau of Administration should develop and implement a strategy for improving the quality of Arabic translations that incorporates monetary and nonmonetary performance incentives and additional recruiting outreach. (Action: A)

INFORMAL RECOMMENDATIONS

Informal recommendations cover matters not requiring action by organizations outside of the inspected unit and/or the parent regional bureau and are not be subject to the OIG compliance process. However, any subsequent OIG inspection or onsite compliance review will assess the inspected entity's progress in implementing the informal recommendations.

The span of control of LS's office director is too broad, consuming too much of her time while not effectively developing the skills of a capable administrative officer.

Informal Recommendation 1: The Bureau of Administration should restructure the Office of Language Services to reduce the span of control of the office director by expanding the number of people reporting to the administrative officer.

The requirements of the position of office director call for extraordinary talents and specific job knowledge that must be acquired over a long learning period. The office has no designated deputy or process by which to develop someone to replace the director on her departure.

Informal Recommendation 2: The Bureau of Administration should provide leadership training and mentoring to senior managers in the Office of Language Services.

The specialized support requirements of LS translators are not commonly found among federal employees. One such requirement is to have authoritative glossaries of technical terms used in different languages and in professional fields such as arms control, treaties, diplomatic relations, trade, and narcotics. Glossaries are extremely useful for new translators and for quality control but are time-consuming to maintain, and LS has no one to do this.

Informal Recommendation 3: The Bureau of Administration should establish a terminologist position for someone to collect, edit, and distribute electronic glossaries for use by direct-hire and contract translators.

The collection of the surcharge imposed for administrative expenses that arise from contracting activities is permissible under LS's Economy Act agreements with other agencies. LS's 15-percent surcharge has not been recalculated since 1995, however, and may not accurately reflect LS's administrative expenses .

Informal Recommendation 4: The Bureau of Administration should review and update the cost factors that are included in the calculation of its Economy Act reimbursable surcharge.

Procurement regulations explicitly call for language services contracts to be cleared by LS. Grants do not have the same requirement , and at least one bureau of the Department has used a grant to pay for its language services without consulting with LS.

Informal Recommendation 5: The Bureau of Administration should require the grants used to pay for language services to undergo the same clearance requirements as procurement actions.

PRINCIPAL OFFICIALS

	Name	Arrival Date
Assistant Secretary	Rajkumar Chellaraj	06/06
Deputy Assistant Secretary for Operations	Steven J. Rodriguez, acting	07/05
Director, Office of Language Services	Brenda S. Sprague	05/95

ABBREVIATIONS

A	Bureau of Administration
A/EX	Office of the Executive Director, Bureau of Administration
IT	Information technology
LS	Bureau of Administration, Office of Language Services
OIG	Office of Inspector General
OPM	Office of Personnel Management