

**GAO**

Report to the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate

---

June 2010

# DEPARTMENT OF HOMELAND SECURITY

## DHS Needs to Comprehensively Assess Its Foreign Language Needs and Capabilities and Identify Shortfalls



**GAO**

Accountability \* Integrity \* Reliability

---



Highlights of [GAO-10-714](#), a report to the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate

## Why GAO Did This Study

The Department of Homeland Security (DHS) has a variety of responsibilities that utilize foreign language capabilities, including investigating transnational criminal activity and staffing ports of entry into the United States. GAO was asked to study foreign language capabilities at DHS. GAO's analysis focused on actions taken by DHS in three of its largest components—the U.S. Coast Guard, U.S. Customs and Border Protection (CBP), and Immigration and Customs Enforcement (ICE). Specifically, this report addresses the extent to which DHS has (1) assessed its foreign language needs and existing capabilities and identified any potential shortfalls and (2) developed foreign language programs and activities to address potential foreign language shortfalls. GAO analyzed DHS documentation on foreign language capabilities, interviewed DHS officials, and assessed workforce planning in three components that were selected to ensure broad representation of law enforcement and intelligence operations. While the results are not projectable, they provide valuable insights.

## What GAO Recommends

GAO recommends that DHS comprehensively assess its foreign language needs and capabilities and identify potential shortfalls, assess the extent to which existing foreign language programs are addressing foreign language shortfalls, and ensure that these assessments are incorporated into future strategic planning. DHS generally concurs with the recommendations.

View [GAO-10-714](#) or [key components](#). For more information, contact David C. Maurer at (202) 512-9627 or [maurerd@gao.gov](mailto:maurerd@gao.gov).

## DEPARTMENT OF HOMELAND SECURITY

### DHS Needs to Comprehensively Assess Its Foreign Language Needs and Capabilities and Identify Shortfalls

#### What GAO Found

DHS has taken limited actions to assess its foreign language needs and existing capabilities and to identify potential shortfalls. GAO and the Office of Personnel Management have developed strategic workforce guidance that recommends, among other things, that agencies (1) assess workforce needs, such as foreign language needs; (2) assess current competency skills; and (3) compare workforce needs against available skills. However, DHS has done little at the department level, and individual components' approaches to addressing foreign language needs and capabilities and assessing potential shortfalls have not been comprehensive. Specifically:

- DHS has no systematic method for assessing its foreign language needs and does not address foreign language needs in its Human Capital Strategic Plan. DHS components' efforts to assess foreign language needs vary. For example, the Coast Guard has conducted multiple assessments, CBP's assessments have primarily focused on Spanish language needs, and ICE has not conducted any assessments. By conducting a comprehensive assessment, DHS would be better positioned to capture information on all of its needs and could use this information to inform future strategic planning.
- DHS has no systematic method for assessing its existing foreign language capabilities and has not conducted a comprehensive capabilities assessment. DHS components have developed various lists of foreign language capable staff that are available in some offices, primarily those that include a foreign language award program for qualified employees. Conducting an assessment of all of its capabilities would better position DHS to manage its resources.
- DHS and its components have not taken actions to identify potential foreign language shortfalls. DHS officials stated that shortfalls can affect mission goals and officer safety. By using the results of needs and capabilities assessments to identify foreign language shortfalls, DHS would be better positioned to develop actions to mitigate shortfalls, execute its various missions that involve foreign language speakers, and enhance the safety of its officers and agents.

DHS and its components have established a variety of foreign language programs and activities but have not assessed the extent to which they address potential shortfalls. Coast Guard, CBP, and ICE have established foreign language programs and activities, which include foreign language training and award payments. These programs and activities vary, as does DHS's ability to use them to address shortfalls. For example, foreign language training programs generally do not include languages other than Spanish, and DHS officials were generally unaware of the foreign language programs in DHS's components. Given this variation and decentralization, conducting a comprehensive assessment of the extent to which its programs and activities address shortfalls could strengthen DHS's ability to manage its foreign language programs and activities and to adjust them, if necessary.

---

# Contents

---

<b>Letter</b>		1
	Background	4
	DHS Has Taken Limited Actions to Assess Foreign Language Needs and Capabilities and Identify Potential Shortfalls	9
	DHS Has Developed a Variety of Foreign Language Programs, but the Extent to Which They Address Foreign Language Shortfalls Is Not Known	19
	Conclusions	26
	Recommendations for Executive Action	27
	Agency Comments and Our Evaluation	28
<b>Appendix I</b>	<b>Scope and Methodology</b>	30
<b>Appendix II</b>	<b>Human Capital Management and Workforce Planning Guidance</b>	34
<b>Appendix III</b>	<b>Federal Interagency Language Roundtable Proficiency Scale</b>	36
<b>Appendix IV</b>	<b>Comments from the Department of Homeland Security</b>	37
<b>Appendix V</b>	<b>GAO Contact and Staff Acknowledgments</b>	39
<b>Related GAO Products</b>		40
<b>Tables</b>		
	Table 1: DHS Select Component Responsibilities for Which There Is Potential for Use of Foreign Language Capabilities	5
	Table 2: DHS Components' and Offices' Foreign Language Assessments and Needs	11

---

Table 3: DHS Components' and Offices' Knowledge of Foreign Language Capabilities	15
Table 4: Components' and Offices' Foreign Language Programs and Activities	20
Table 5: DHS Components' and Offices' with Foreign Language Award Programs	23
Table 6: Federal Foreign Language Proficiency Levels	36

---

### Abbreviations

CBP	U.S. Customs and Border Protection
CSRS	Civil Service Retirement System
CTR	Counter-Terrorist Response
DHS	Department of Homeland Security
DLPT	Defense Language Proficiency Test
DRO	Office of Detention and Removal Operations
FBI	Federal Bureau of Investigation
FERS	Federal Employees' Retirement System
FLETC	Federal Law Enforcement Training Center
ICE	U.S. Immigration and Customs Enforcement
ILR	Interagency Language Roundtable
OCHCO	Office of the Chief Human Capital Officer
OPM	Office of Personnel Management
PAU/TAG	passenger analysis unit and tactical group

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



United States Government Accountability Office  
Washington, DC 20548

June 22, 2010

The Honorable Daniel K. Akaka  
Chairman  
The Honorable George V. Voinovich  
Ranking Member  
Subcommittee on Oversight of Government Management,  
the Federal Workforce, and the District of Columbia,  
Committee on Homeland Security and Governmental Affairs  
United States Senate

In the wake of a changing security environment, federal agencies' needs for personnel with foreign language proficiencies have grown significantly. In the aftermath of the September 11, 2001, terrorist attacks, the United States established the Department of Homeland Security (DHS), which has a variety of missions, including protecting against terrorism, securing and managing the nation's borders, and enforcing immigration and custom laws, among others. DHS's components are located on our coastlines and land borders and throughout the country and abroad. In carrying out their daily responsibilities, many of the men and women at DHS frequently interact with individuals who do not speak English, or rely on information that needs to be translated from another language to English. DHS staff encounter a wide array of languages and dialects, under sometimes difficult and unpredictable circumstances, including arrests, surveillance, and interviewing individuals. Foreign language skills are vital for DHS personnel to effectively communicate and overcome language barriers encountered during critical operations, and are a key element to the success of the department's homeland security responsibilities.

Since 2002, we have issued a series of reports<sup>1</sup> on two key aspects of foreign language capabilities across the federal government.<sup>2</sup> Our work has examined (1) the use of foreign language skills as well as (2) the nature and impact of foreign language shortages at federal agencies,

---

<sup>1</sup>See Related GAO Products at the end of this report.

<sup>2</sup>In this report, we refer to foreign language capabilities as the capabilities that include a range of language skills, proficiencies, and resources to conduct operations related to homeland security involving foreign language (e.g., language-proficient staff, language services obtained through contracts, and inter- and intra-agreements between DHS and other federal agencies).

---

particularly those that play a central role in national security. We have reported that lack of foreign language capability at some agencies, including the Departments of Defense and State as well as the Federal Bureau of Investigation (FBI), have resulted in backlogs in translation of intelligence documents and other information, adversely affected agency operations, and hindered U.S. military, law enforcement, intelligence, counterterrorism, and diplomatic efforts. We and the Office of Personnel Management (OPM) have developed strategic workforce planning guidance that has formed the basis for our prior reviews on foreign language capabilities at other departments. We recommended that these agencies adopt a strategic, results-oriented approach to manage foreign language capabilities, including setting a strategic direction, assessing agency gaps in foreign language skills, and taking actions to help ensure that foreign language capabilities are available when needed, among other things.<sup>3</sup> Most recently, in September 2009, we reported that Department of State documents did not contain measurable goals, objectives, resource requirements, and milestones for reducing its foreign language gaps, and recommended that a more comprehensive strategic approach be established to more effectively guide and assess progress in meeting foreign language requirements.<sup>4</sup>

In response to your request, this report discusses foreign language capabilities at DHS. For this review, our analysis focused on actions taken by DHS to assess its foreign language capabilities and address shortfalls in three of its largest components—the U.S. Coast Guard, U.S. Customs and Border Protection (CBP), and Immigration and Customs Enforcement (ICE). We also focused on some offices in those components that use foreign language capabilities to carry out law enforcement and intelligence activities. Specifically, this report addresses the extent to which DHS has (1) assessed its foreign language needs and existing capabilities and identified any potential shortfalls and (2) developed foreign language programs and activities to address any foreign language shortfalls.

For this work, we obtained all available foreign language-related assessments conducted by three DHS components and seven offices

---

<sup>3</sup>GAO, *Foreign Languages: Human Capital Approach Needed to Correct Staffing and Proficiency Shortfalls*, [GAO-02-375](#) (Washington, D.C.: Jan. 31, 2002).

<sup>4</sup>GAO, *Department of State: Comprehensive Plan Needed to Address Persistent Foreign Language Shortfalls*, [GAO-09-955](#) (Washington, D.C.: Sept. 17, 2009).

---

within those components.<sup>5</sup> The earliest assessment was conducted in 1999, and the most recent assessment was conducted in 2009. We selected the Coast Guard, CBP, and ICE to review because they comprise a broad representation of program areas whose missions include law enforcement and intelligence responsibilities. We then selected locations based on geographic regions, border locations, and language use. The locations we visited were San Antonio and Laredo, Texas; Artesia, New Mexico; New York City and Buffalo, New York; Miami, Florida; and San Juan, Puerto Rico. Although the results are not projectable, they provided us with valuable insights about the exposure to and use of foreign languages across DHS, primarily Spanish. We examined documentation on foreign language needs and capabilities, including DHS's strategic plans for fiscal years 2004 through 2008 and 2008 through 2013, human capital plans for fiscal years 2004 through 2008 and 2009 through 2013, and DHS's *Work Force Planning Guide* and *Quadrennial Homeland Security Review Report*.<sup>6</sup> Further, we interviewed knowledgeable DHS officials in DHS's Office of the Chief Human Capital Officer (OCHCO) and conducted over 430 interviews with component officials for all the locations we visited to obtain information on existing capabilities and potential foreign language capability shortfalls.<sup>7</sup> We compared DHS activities to criteria in our and OPM's strategic workforce planning guidance.<sup>8</sup> We also visited CBP's Border Patrol Academy at the Federal Law Enforcement Training Center to observe the Spanish Language Program, interviewed officers in training and program officials about their training program, and examined documentation on foreign language training development for all existing programs at select component offices. Appendix I contains additional details on our scope and methodology.

---

<sup>5</sup>In this report, we refer to select component offices as the Coast Guard's Foreign Language Program Office; CBP's Office of U.S. Border Patrol, Office of Air and Marine, and Office of Field Operations; and ICE's Office of Detention and Removal Operations, Office of Investigations, and Office of Intelligence.

<sup>6</sup>Department of Homeland Security, *Quadrennial Homeland Security Review Report: A Strategic Framework for a Secure Homeland* (Washington, D.C., February 2010).

<sup>7</sup>We interviewed the following component officials: Coast Guard personnel; Border Patrol agents; Air and Marine officers; CBP officers and agriculture specialists; and ICE officers, special agents, and intelligence research specialists.

<sup>8</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003), and Office of Personnel Management, *Migration Planning Guidance Documents: Workforce Planning Best Practices* (Washington, D.C., May 2008).

---

We conducted this performance audit from December 2008 through June 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

## Background

---

### DHS Use of Foreign Language Capabilities

The Homeland Security Act of 2002 created DHS and brought together the workforces of 22 distinct agencies governed by multiple legacy rules, regulations, and laws for hundreds of occupations.<sup>9</sup> The department's 216,000 employees include a mix of civilian and military personnel in fields ranging from law enforcement, science, professional, technology, administration, clerical professions, trades, and crafts.

DHS has a vital role in preventing terrorist attacks, reducing our vulnerability to terrorism, and minimizing the damage and facilitating the recovery from attacks that do occur. The *National Strategy for Combating Terrorism* calls on all government agencies to review their foreign language programs. Further, the *National Strategy for Homeland Security* articulates activities to enhance government capabilities, including prioritizing the recruitment and retention of those having relevant language skills at all levels of government.<sup>10</sup> The 9/11 Commission, a statutory bipartisan commission created in 2002, concluded in 2004 that significant changes were needed in the organization of government, to include acquiring personnel with language skills and developing a stronger language program.<sup>11</sup>

---

<sup>9</sup>Homeland Security Act of 2002, Pub. L. No. 107-296, 116 Stat. 2135 (2002).

<sup>10</sup>*National Strategy for Combating Terrorism Report* (Washington, D.C., February 2003), and *National Strategy for Homeland Security* (Washington, D.C., October 2007).

<sup>11</sup>The 9/11 Commission was established in the Intelligence Authorization Act for Fiscal Year 2003, Pub. L. No. 107-306, 116 Stat. 2383 (2002). The commission was mandated to provide recommendations for corrective measures that can be taken to prevent acts of terrorism, among other things. On July 22, 2004, the commission released its public report.

DHS has a variety of law enforcement and intelligence responsibilities that utilize foreign language capabilities. For example, DHS undertakes immigration enforcement actions involving thousands of non-English-speaking foreign nationals and conducts criminal investigations that cross national borders, among other things. Conducting investigations and dismantling criminal organizations that transport persons and goods across the borders illegally are operations where foreign language capabilities help DHS to identify and effectively analyze terrorist intent. DHS also reports that foreign language capabilities enhance its ability to more effectively communicate with persons who do not speak English to collect and translate intelligence information related to suspected illegal activity.

At the component level, Coast Guard, CBP, and ICE are among DHS's largest components with law enforcement and intelligence responsibilities that have a potential use of foreign language capabilities. Table 1 briefly describes the law enforcement and intelligence roles and responsibilities of these components.

**Table 1: DHS Select Component Responsibilities for Which There Is Potential for Use of Foreign Language Capabilities**

DHS components	Law enforcement and intelligence roles and responsibilities where there is potential for foreign language use
<b>U.S. Coast Guard</b>	Enforces immigration laws at sea by interdicting, communicating with, and boarding vessels to intercept undocumented persons; denying these persons illegal entry to the United States via maritime routes; and disrupting and deterring illegal activity while encountering persons of various nationalities.
<b>U.S. Customs and Border Protection</b>	
U.S. Border Patrol	Conducts operations to prevent terrorists, terrorist weapons, inadmissible aliens, smugglers, and narcotics and other contraband from entering the United States between ports of entry while approaching individuals and groups to interview, gathering information, and examining documents and records of individuals with varying backgrounds.
Office of Air and Marine	Operates air and marine forces to detect and interdict drugs and weapons, and prevents acts of terrorism and the unlawful movement of people, illegal drugs, and other contraband along or across the borders and within the United States, Canada, the Bahamas, Mexico, and the Caribbean while encountering a variety of foreign languages in use in the operating area.
Office of Field Operations	Conducts operations to prevent terrorists, terrorist weapons, inadmissible aliens, smugglers, and narcotics and other contraband from entering the United States. Conducts operations to facilitate legitimate trade and travel at the nation's air, land, and sea ports of entry while using judgment and applying behavioral and cultural analysis, questioning individuals, and examining documents. Encounters and overcomes language and cultural obstacles to make determinations and to further compliance with U.S. laws.

<b>Law enforcement and intelligence roles and responsibilities where there is potential for foreign language use</b>	
<b>DHS components</b>	
<b>Immigration and Customs Enforcement</b>	
Office of Detention and Removal Operations	Performs enforcement functions for individuals who are subject to removal or criminal proceedings by reviewing documentation and interviewing persons at various stages of deportation, encountering a variety of foreign languages. Also analyzes records and develops and uses informants to develop leads on where individuals of varying backgrounds may be found to obtain and execute warrants of arrest.
Office of Investigations	Identifies and recruits sources of information to develop investigations, conduct interviews, and communicate with criminal targets in proactive investigations that may involve persons who speak foreign languages.
Office of Intelligence	Collects intelligence information through various sources, which may require foreign language capabilities, and conducts interviews of persons of interest and develops reports on intelligence information to support homeland security activities.

Source: GAO analysis of DHS documentation.

OCHCO is responsible for departmentwide human capital policy and development, planning, and implementation. In this role, OCHCO works with the components to ensure the best approach for the department’s human capital initiatives. Specifically, OCHCO establishes DHS-wide policies and processes and works with components to ensure that the policies and processes are followed to ensure mission success. Additionally, OCHCO provides strategic human capital direction to and certification of departmental programs and initiatives, such as DHS’s foreign language capabilities.

## DHS Components Have a Variety of Missions

The Coast Guard is a multi-mission agency, the only military agency within DHS, and serves as the lead agency for maritime homeland security, enforcing immigration laws at sea. In support of DHS’s mission to control U.S. borders, the Coast Guard’s Ports, Waterways, and Coastal Security mission goal is to manage terror-related risk in the maritime domain. Additionally, its responsibilities include (1) interdicting undocumented persons attempting to illegally enter the United States via the maritime sector and (2) boarding vessels to conduct inspections and screenings of crew and passengers in its attempt to reduce the number of illegal passenger vessels entering the United States, among other things. For example, Coast Guard Maritime Safety and Security Teams conduct patrols and monitor migration flow from countries neighboring the Caribbean Basin, including Colombia, Venezuela, Haiti, and the Dominican Republic. In fiscal year 2009, the Coast Guard increased its presence in the vicinity of Haiti to deter mass migration and interdicted nearly 3,700 undocumented persons attempting to illegally enter the United States. Additionally, during fiscal year 2009, the Coast Guard reported screening over 248,000 commercial vessels and 62 million crew and passengers for

---

terrorist and criminal associations prior to arrival in U.S. ports, identifying 400 individuals with terrorism associations. The Coast Guard conducts approximately 10,000 law enforcement boardings while interdicting drugs each year in the southern Caribbean, which is where the Coast Guard is likely to encounter non-English speakers.

CBP is the federal agency in charge of securing U.S. borders and three of its offices—the Offices of U.S. Border Patrol, Air and Marine, and Field Operations—share a mission of keeping terrorists and their weapons from entering the United States while carrying out its other responsibilities, including interdicting illegal contraband and persons seeking to enter at and between U.S. ports of entry while facilitating the movement of legitimate travelers and trade.<sup>12</sup> CBP regularly engages with foreign nationals in carrying out its missions and is DHS's only component authorized to make final admissibility determinations regarding arrivals of cargo and passengers. Annually, CBP reports that it has direct contact with approximately 1 million people crossing borders through ports of entry each day. It is through these contacts that CBP has a potential likelihood of encountering non-English speakers. As a result, foreign language skills are needed to assist CBP federal law enforcement officers in enforcing a wide range of U.S. laws. In 2009, CBP encountered over 224,000 undocumented immigrants and persons not admissible at the ports of entry. CBP employs over 45,000 employees, including border patrol agents stationed at 142 stations with 35 permanent checkpoints, Air and Marine agents and officers, and CBP officers and agriculture specialists stationed at over 326 ports of entry located at airports, seaports, and land borders along more than 5,000 miles of land border with Canada, 1,900 miles of border with Mexico, and 95,000 miles of U.S. coastline. Border patrol agents work between the ports of entry to interdict people and contraband illegally entering the United States. CBP's Office of Air and Marine manages boats and aircraft to support all operations to interdict drugs and terrorists before they enter the United States. CBP officers work at foreign and domestic ports of entry to prevent cross-border smuggling of contraband, such as controlled substances, weapons of mass destruction, and illegal goods.

ICE is the largest investigative arm of DHS, with more than 20,000 employees worldwide. ICE has immigration and custom authorities to

---

<sup>12</sup>U.S. ports of entry include land border crossings along the Canadian and Mexican borders, seaports, and U.S. airports for international flight arrivals.

---

prevent terrorism and criminal activity by targeting people, money, and materials that support terrorist and criminal organizations. ICE and three of its offices—the Offices of Detention and Removal Operations, Investigations, and Intelligence—identifying, apprehending, and investigating threats arising from the movement of people and goods into and out of the United States. In fiscal year 2009, the Office of Detention and Removal Operations completed 387,790 removals, 18,569 more than in fiscal year 2008. ICE’s Office of Investigations investigates a broad range of domestic and international activities arising from illicit movement of people that violates immigration laws and threatens national security. For example, investigations where there is a potential use of foreign language capabilities include those for human trafficking and drug smuggling, illegal arms trafficking, and financial crimes. In 2009, ICE initiated 6,444 investigations along U.S. borders. ICE’s Office of Intelligence is responsible for collecting operational and tactical intelligence that directly supports law enforcement and homeland security missions.

---

## Guidance on Strategic Workforce Planning

Strategic workforce planning helps ensure that an organization has the staff with the necessary skills and competencies to accomplish strategic goals. We and OPM have developed guidance for managing human capital and developing strategic workforce planning strategies.<sup>13</sup> Since 2001, we have reported strategic human capital management as an area with a high risk of vulnerability to fraud, waste, abuse, and mismanagement. In January 2009, we reported that while progress has been made in the last few years to address human capital challenges, ample opportunities exist for agencies to improve in several areas.<sup>14</sup> For example, we reported that making sure that strategic human capital planning is integrated with broader organizational strategic planning is critical to ensuring that agencies have the talent and skill mix they need to address their current and emerging human capital challenges.<sup>15</sup>

Our and OPM’s workforce planning guidance recommends, among other things, that agencies (1) assess their workforce needs, such as their foreign language needs; (2) assess current competency skills, such as

---

<sup>13</sup>For a more complete discussion of human capital management and workforce planning guidance, see app. II.

<sup>14</sup>GAO, *High-Risk Series: An Update*, [GAO-09-271](#) (Washington, D.C.: January 2009).

<sup>15</sup>[GAO-04-39](#).

---

foreign language capabilities; and (3) compare workforce needs against available skills to identify any shortfalls, such as those related to foreign language capabilities.

---

## DHS Has Taken Limited Actions to Assess Foreign Language Needs and Capabilities and Identify Potential Shortfalls

DHS has taken limited actions to assess its foreign language needs and capabilities and to identify potential shortfalls. DHS efforts could be strengthened if it conducts a comprehensive assessment of its foreign language needs and capabilities and uses the results of this assessment to identify any potential shortfalls. By doing so, DHS could better position itself to manage its foreign language workforce needs to help fulfill its organizational missions.

---

## DHS Has Taken Limited Actions to Assess Its Foreign Language Needs

DHS has not comprehensively assessed its foreign language needs because, according to DHS senior officials, there is no legislative directive for the department to assess its needs for foreign languages. As a result, DHS lacks a complete understanding of the extent of its foreign language needs. According to DHS officials, the department relies on the individual components to address their foreign language needs. However, while some DHS components have conducted various foreign language assessments, these assessments are not comprehensive and do not fully address DHS's foreign language needs for select offices or programs consistent with strategic workforce planning. Specifically, the components' foreign language assessments assess primarily Spanish language needs rather than comprehensively addressing other potential foreign language needs their workforces are most likely to encounter in fulfilling their missions.

While DHS's *Human Capital Strategic Plan* discusses efforts to better position the department to have the right people in the right jobs at the right time, DHS has not linked these efforts to addressing its workforce's foreign language needs. DHS's strategic plan acknowledges the department's multifaceted workforce and the complexity of DHS operations, and envisions "a department-wide approach that enables its workforce to achieve its mission," but it does not discuss how its planned efforts will help ensure that the workforce's foreign language needs are

---

met.<sup>16</sup> Further, the DHS *Quadrennial Homeland Security Review*, which was completed in February 2010, does not address foreign language capabilities and needs.<sup>17</sup> The Implementing Recommendations of the 9/11 Commission Act of 2007 called for each quadrennial review to be a comprehensive examination of the homeland security strategy of the nation, including recommendations regarding the long-term strategy and priorities of the assets, capabilities, budget, policies, and authorities of the department.<sup>18</sup> As we previously reported, strategic human capital planning that is integrated with broader organizational strategic planning is critical to ensuring that agencies have the talent and skill mix they need to address their human capital challenges.<sup>19</sup> While the department states that there is no legislative directive for it to assess its foreign language capabilities and relies on the individual components, considering foreign language capabilities when setting its strategic future direction would help DHS to more effectively guide its efforts and those of its components in determining the foreign language needs necessary to achieve mission goals and address its needs and any potential shortfalls.

The extent to which components have conducted language assessments of their foreign language needs varies. These assessments were limited primarily to Spanish as well as the needs of the workforce in certain offices, locations, and positions rather than comprehensive assessments addressing multiple languages and needs of the workforce as a whole. Table 2 shows the various assessments that were conducted at the component level and in certain offices.

---

<sup>16</sup>Department of Homeland Security, *Human Capital Strategic Plan Fiscal Years 2009-2013* (Washington, D.C., October 2008).

<sup>17</sup>Department of Homeland Security, *Quadrennial Homeland Security Review Report*.

<sup>18</sup>Pub. L. No. 110-53, 121 Stat. 266, 544 (2007).

<sup>19</sup>[GAO-04-39](#).

**Table 2: DHS Components' and Offices' Foreign Language Assessments and Needs**

DHS component	Office	Language assessments	Foreign language needs
U.S. Coast Guard	Foreign Language Program Office	1999 <i>Foreign Language Needs Assessment</i> 2008 <i>Foreign Language Speakers Needs Assessment</i> 2009 <i>Foreign Language Speakers Interpreter and Linguist Performance Analysis</i> <sup>a</sup>	Spanish, Haitian-Creole, Russian, Vietnamese, Mandarin Chinese, Japanese, Korean, Arabic, French, Indonesian, Portuguese, and Tagalog
U.S. Customs and Border Protection	U.S. Border Patrol	None	Spanish <sup>b</sup>
	Office of Air and Marine	2009 <i>Marine Interdiction Agent (MIA) Critical Analysis to Support Spanish Language Need</i> <sup>c</sup>	Spanish
	Office of Field Operations	2004 <i>Spanish Language Proficiency Determination for Customs and Border Protection Officer</i> <sup>d</sup>	Spanish
Immigration and Customs Enforcement	Office of Detention and Removal Operations	None	Spanish <sup>e</sup>
	Office of Investigations	None	None specified
	Office of Intelligence	None	None specified

Source: GAO analysis of DHS components' documentation.

<sup>a</sup>U.S. Coast Guard, Office of Law Enforcement, *Foreign Language Needs Assessment, Final Report* (Washington, D.C., 1999); *Foreign Language Speakers, Needs Assessment* (Petaluma, Calif., 2008); and *Foreign Language Speakers Interpreter and Linguists, New Performance and Planning Front End Analysis* (Petaluma, Calif., 2008).

<sup>b</sup>The agency administrative provision governing the requirements and procedures that are applicable to the training, evaluation, and examination of border patrol agent trainees, including their Spanish language skills, is Section 2301.02 of the *Administrative Manual* and went into effect on May 20, 1983.

<sup>c</sup>U.S. Customs and Border Protection, *Marine Interdiction Agent (MIA) Critical Task Analysis to Support Spanish Task-Based Language Training, Final High Level Recommendations Report* (Alexandria, Va., 2009).

<sup>d</sup>U.S. Customs and Border Protection, *Spanish Language Proficiency Determination for Customs and Border Protection Officer, Report and Recommendations* (Washington, D.C., 2004).

<sup>e</sup>The Office of Detention and Removal Operations prior to its transfer to DHS had identified and established Spanish foreign language requirements, but after the transfer in March 2003 those requirements were rescinded and then reinstated in 2007.

**Coast Guard.** Since 1999, the Coast Guard has conducted three assessments that identified the need for certain foreign language capabilities, which have resulted in the Coast Guard establishing requirements for certain foreign languages skills related to 12 mission-critical languages and foreign language positions for the foreign language

---

award program. Additionally, according to the Coast Guard's Foreign Language Program Manager, by obtaining information from Coast Guard leadership and operational units, the Coast Guard determines what languages are encountered most in the field. Additionally, the official stated that annual reviews are conducted to determine how best to allocate the Coast Guard's foreign language linguist and interpreter positions. A "linguist" is expected to use his or her foreign language skills on an almost daily basis in support of a specific function within his or her unit, while interpreting is a collateral duty that can be filled by any qualified personnel. According to Coast Guard officials, they face difficulty in meeting their foreign language needs because of the difficulties experienced by personnel in obtaining qualifying proficiency scores on the Defense Language Proficiency Test (DLPT).<sup>20</sup> To meet foreign language program requirements, DLPT testing results are used to make allocation decisions for foreign language speakers. For example, according to the Foreign Language Program Manager, at one of its offices near Brownsville, Texas, the Coast Guard has native Spanish-speaking personnel who successfully use Spanish during operations but are not testing high enough on the DLPT and thus are not considered during allocation decisions for foreign language needs.

**CBP.** CBP has conducted two assessments since 2004 that have primarily focused on Spanish language needs. CBP's needs assessments are based on a task-based analysis. For example, CBP assessed critical tasks necessary to carry out certain operations, such as its officers requesting and analyzing biographical information from persons entering the United States and addressing suspects attempting to smuggle people, weapons, drugs, or other contraband across borders. These encounters may require foreign language skills, primarily Spanish for offices such as the U.S. Border Patrol, the Office of Air and Marine, and the Office of Field Operations. However, CBP's foreign language assessment for its Office of Field Operations included only those CBP officers located along the southwest border, in Miami, and in Puerto Rico, and this assessment did not include its foreign language needs in other field offices around the country. CBP's U.S. Border Patrol conducted similar assessments, which focused on assessing its foreign language training program, while the Office of Air and Marine's foreign language assessment determined the

---

<sup>20</sup>The DLPT is a battery of foreign language tests produced by the Defense Language Institute to assess language proficiency in a specific foreign language in the skills of reading and listening, and also includes an interview to determine oral proficiency.

---

extent of its Spanish language needs and, as a result, established its Spanish language training program.

**ICE.** According to ICE officials, rather than conducting foreign language needs assessments, ICE primarily identifies its needs based on daily activities. That is, ICE relies on its agents' knowledge of foreign languages they have encountered most frequently during their daily law enforcement and intelligence operations. However, ICE has not collected data on what those daily needs are. Without such data, ICE is not in a position to comprehensively assess its language needs. According to ICE officials, in 2007, ICE reinstated the Spanish language requirements that were in place prior to the formation of DHS for its Office of Detention and Removal Operations. Further, for its Offices of Investigations and Intelligence, it utilizes foreign language interpreter services by contract for foreign languages necessary, including Spanish.<sup>21</sup>

The components' efforts to assess their foreign language needs are varied and not comprehensive. Specifically, the assessments have been limited to certain languages, locations, programs, and offices. As a result, component officials we spoke with identified foreign language needs that are not captured in these assessments, such as the following:

- In the five CBP and ICE offices we visited near the Mexican border, we were told that they have encountered foreign language needs for variations of Spanish language skills, such as Castilian, border, and slang Spanish (that is, Spanish dialects in certain geographic regions that use words and phrases that are not part of the official language). According to ICE officials, in 2009, its Office of Detention and Removal Operations experienced a need for Mandarin Chinese language skills because of an influx of encounters with Chinese speakers near the Mexican border. However, CBP and ICE have not assessed their needs for Chinese speakers.
- In the three CBP and ICE offices we visited near the Canadian border, we were told that their encounters primarily involve Spanish, Arabic,

---

<sup>21</sup>Services obtained by contract include interpretation, translation, and transcription. For example, ICE's Office of Investigations conducts wiretapping (intercepting of communications content) under Title III that may include conversations in a foreign language that can be interpreted or translated through contact services to support criminal investigations. ICE Title III investigations include the investigation of possible crimes related to narcotics, human trafficking and smuggling, technology transfer, financial investigations, and gangs.

---

and Quebecois French speakers. However, CBP and ICE have not assessed their needs for Arabic and Quebecois French speakers.

- In the seven Coast Guard, CBP, and ICE offices we visited in the Caribbean region, we were told that they primarily encounter Puerto Rican and slang Spanish, Haitian-Creole, and Patois. Although the Coast Guard has assessed its need for some of these languages, CBP and ICE have not assessed their needs in these languages.
- Coast Guard, CBP, and ICE offices in New York report that their primary language needs include Colombian Spanish, Arabic, Chinese, Urdu, and Fulani. Although the Coast Guard has assessed its need for these languages, CBP and ICE have not assessed their needs for Arabic, Chinese, Urdu, and Fulani.

According to DHS officials, foreign language skills are an integral part of the department's operations. Coast Guard, CBP, and ICE officials in the seven components generally agreed that a comprehensive approach to conducting a foreign language needs assessment would be beneficial. By conducting a comprehensive assessment, DHS would be in a better position to address its foreign language needs. In addition, this assessment would enable the Coast Guard, CBP, and ICE to comprehensively assess their component-level foreign language needs.

---

### DHS Has Taken Limited Actions to Assess Foreign Language Capabilities

DHS, including the Coast Guard, CBP, and ICE, has not comprehensively assessed its existing foreign language capabilities. However, components have various lists of staff with foreign language capabilities, as shown in table 3.

**Table 3: DHS Components' and Offices' Knowledge of Foreign Language Capabilities**

DHS component	Office	Existing knowledge of foreign language capabilities
U.S. Coast Guard	Foreign Language Program Office	Personnel voluntarily identified as foreign language speakers, in certain languages and proficiency levels, and meet foreign language award program requirements.
U.S. Customs and Border Protection	U.S. Border Patrol	All officers and agents that demonstrated a certain level of Spanish language skills through the Border Patrol Academy.
	Office of Air and Marine	Officers and agents that demonstrated a certain level of Spanish language skills through the Border Patrol Academy.
	Office of Field Operations	Officers and agriculture specialists that demonstrated a certain level of Spanish language skills through the Office of Field Operation's academy. Officers and agriculture specialists voluntarily identified as foreign language speakers, in certain languages and proficiency levels, and meet foreign language award program requirements. <sup>a</sup>
Immigration and Customs Enforcement	Office of Detention and Removal Operations	Some officers and agents that demonstrated a certain level of Spanish language skills through ICE's academy.
	Office of Investigations	Agents voluntarily identified as foreign language speakers, in certain languages and proficiency levels, and meet foreign language award program requirements.
	Office of Intelligence	None documented.

Source: GAO analysis of DHS components' documentation.

<sup>a</sup> In general, under 19 U.S.C. 267a, cash awards for foreign language proficiency may, under regulations prescribed by the Secretary of the Treasury, be paid to customs officers (as referred to in section 267 (e)(1) of this title) to the same extent and in the manner as would be allowable under subchapter III of chapter 45 of title 5 with respect to law enforcement officers (as defined by section 4521 of such title).

Although DHS and its components maintain these lists that identify some of their staff with foreign language capabilities, these lists generally capture capabilities for personnel in certain components or offices, primarily those that include a foreign language award program for qualified employees. These include the Coast Guard, CBP's Office of Field Operations, and ICE's Office of Investigations.

**Coast Guard.** The Coast Guard, through its foreign language award program for foreign language skills, has developed a list that identifies personnel with certain proficiencies in one or more authorized foreign languages and meets program requirements. For example, the list identifies a Coast Guard member with a certain proficiency level in Spanish at the Miami Sector office. However, these lists contain the personnel voluntarily identified as speaking an authorized foreign language and have successfully met the program's requirements and receiving award payments. While this list identifies some personnel who speak at least one of the 12 authorized languages, it does not account for personnel who successfully carry out an operation utilizing their foreign language skills but are unable to meet the proficiency requirements per the

---

**DLPT.** According to the Foreign Language Program Manager, a challenge exists in assigning foreign language speakers while aligning their foreign language proficiencies per the DLPT to the operational needs in the field. As a result, personnel who speak a foreign language are being utilized but are not considered part of Coast Guard's foreign language capabilities and are unable to receive foreign language award payments. In May 2010, the Coast Guard made some changes to its foreign language program and expanded compensation requirements to include other proficiency levels and award payments, which could improve its ability to identify foreign language resources that were unaccounted for prior to this change to meet its foreign language needs.<sup>22</sup>

**CBP.** CBP, through its foreign language award program in its Office of Field Operations, has developed a list that identifies CBP officers and agriculture specialists with a certain proficiency level in a foreign language. Additionally, it identifies those officers and agriculture specialists who (1) have received Spanish instruction through its academy, and (2) speak Spanish in certain field office locations.

**ICE.** ICE, through its foreign language award program in its Office of Investigations, has developed a list that identifies certain agents with a certain proficiency level in a foreign language. For example, the list includes an agent with a certain proficiency level in Jamaican Patois at the New York field office. Further, although its Offices of Detention and Removal Operations and Intelligence do not have foreign language award programs, they have developed lists in their individual offices of employees with foreign language capabilities. For example, one list identifies an intelligence research specialist at the Office of Intelligence in Miami who speaks Haitian-Creole, but does not include his proficiency level.

Across all three components, while certain offices have developed lists of staff with foreign language capabilities, component officials told us that their knowledge of foreign language capabilities is generally obtained in an ad hoc manner. For example, at each of the seven locations we visited, Coast Guard, CBP, and ICE officials told us that they generally do not use the lists described above to obtain knowledge of their colleagues' foreign

---

<sup>22</sup>A foreign language award program incentivizes some employees by providing a discretionary monetary award that is in addition to basic pay based on the use of certain foreign language skills and proficiencies.

---

language capabilities, but rather have knowledge of their colleagues' foreign language capabilities through their current or past interactions. For example, according to ICE intelligence analysts, existing foreign language capabilities in ICE's Office of Intelligence are not systematically identified in the lists, but the specialists are aware of colleagues who have proficiencies in Spanish, French, Portuguese, and Haitian-Creole. Component officials stated that the inability to identify all existing capabilities may result in intelligence information potentially not being collected, properly translated, or analyzed in its proper context for additional foreign languages and thus affect the timeliness and accuracy of information. Moreover, they said that this information may be vital in tactical and operational intelligence to direct law enforcement operations and develop investigative leads.

Coast Guard, CBP, and ICE staff at each of the seven locations we visited generally agreed that more detailed information on existing capabilities could help them to better manage their resources. These officials told us that while Spanish language proficiency may be identified as an existing capability, it may not always be available and generally the levels of proficiencies vary. For example, according to one ICE immigration enforcement agent in the Office of Detention and Removal Operation's fugitive operation program, he speaks Spanish but is not proficient. He told us that there have been cases in which he needed assistance from an agent who was proficient in Spanish to converse with Spanish speakers. As the agent was not proficient in Spanish, he said he did not apprehend certain individuals because he was unable to verify their immigration status because he could not communicate with them.

Although DHS has some knowledge of its existing capabilities in certain components and offices, conducting an assessment of foreign language capabilities consistent with strategic workforce planning—that is, collecting data in a systematic manner that includes all of DHS's existing foreign language capabilities—would better position DHS to manage its resources.

---

## DHS Has Not Taken Actions to Identify Foreign Language Shortfalls

DHS, including the Coast Guard, CBP, and ICE, has not taken actions to identify potential foreign language shortfalls. Moreover, DHS's *Human Capital Strategic Plan* does not include details on assessing potential shortfalls, as called for by best strategic workforce planning practices. DHS officials in OCHCO told us that in response to our review, they had canvassed the components to assess DHS's foreign language shortfalls and that the components' response was that they address shortfalls through

---

contracts with foreign language interpreter and translation services. This canvassing was not based on a comprehensive assessment of needs and capabilities, which calls into question the extent to which it could comprehensively identify shortfalls. According to OCHCO officials, OCHCO plans to conduct a review and realignment of the DHS *Human Capital Strategic Plan*, and officials said that the plan will include more specific direction to the components on workforce planning guidance.

We also found that the Coast Guard, CBP, and ICE have not taken actions to identify foreign language shortfalls. According to component officials, they face foreign language capability shortfalls that affect their ability to meet their missions. At the Coast Guard, CBP, and ICE locations we visited, 238 of over 430 staff we interviewed identified ways that foreign language shortfalls can increase the potential for miscommunication, affect the ability to develop criminal cases and support criminal charges, increase the risk of loss or delay of intelligence, and can have a negative impact on officer safety. For example, according to the Border Patrol Academy's Spanish Language Program officials, as part of the Spanish language training, a video is shown of an actual incident in which a Texas law enforcement officer begins interviewing four Spanish-speaking individuals during a routine traffic stop. The video was recorded by the law enforcement officer's dashboard video camera. In the video, the four suspects exit the car and begin conversing in Spanish among each other while the officer appears to have difficulty understanding what the individuals are saying. Seconds later, the four individuals attacked the officer, took his gun, and shot the officer to death.

As another example, an ICE special agent told us that in the course of conducting a drug bust in 1991, he had been accidentally shot by a fellow agent because of, among other things, foreign language miscommunications. According to the agent and other sources familiar with the incident, he was working as the principal undercover agent in a drug sting operation in Newark, New Jersey. At the time of the incident, prior to the formation of DHS, he was working as a U.S. Customs Service agent. The undercover operation involved meeting and communicating in Spanish with two Colombian drug dealers as part of a cocaine bust. According to the agent, there were up to 18 other federal agents involved in the operation, at least two of whom were fluent in Spanish. Further, agents were videotaping and monitoring the conversation between the federal agent and the drug dealers from a nearby command post. However, the agent told us that none of the law enforcement officers in the command post who were covertly monitoring his dialogue with the drug dealers spoke or understood Spanish. The agent stated that as a result, law

---

enforcement officers were signaled to rush in prematurely to make the arrests. In the chaos that ensued, the agent was accidentally shot by a fellow agent and paralyzed from the chest down. According to the agent, as well as other agents familiar with the incident, had there been Spanish-speaking officers in the command post to interpret the audio transmissions from the agent, the accidental shooting may have been avoided. By conducting an assessment of needs and capabilities, and using the results of these assessments to identify shortfalls, DHS can be better positioned to take action to mitigate these shortfalls, which will help to ensure the safety of its officers and agents as they fulfill the department's mission.

---

## DHS Has Developed a Variety of Foreign Language Programs, but the Extent to Which They Address Foreign Language Shortfalls Is Not Known

DHS has established a variety of foreign language programs; however, officials stated that they have not addressed the extent to which these programs address existing shortfalls. According to DHS officials in OCHCO, DHS's foreign language programs are managed at the component level and are based on component operational capabilities and mission requirements. The components have established programs and activities, which consist of foreign language training, proficiency testing, foreign language award programs, contract services, and interagency agreements.<sup>23</sup> Table 4 summarizes the extent to which foreign language programs and activities have been established in Coast Guard, CBP, and ICE select offices.

---

<sup>23</sup>Services obtained by contract include face-to-face and over-the-phone interpretation, document translation, and video/audio media transcribing and translating. Select components' language services requests include immigration cases involving deportation, employment authorizations, investigation, and processing deferred inspections and complicated bank transactions involving foreign countries and represented by specific banking or financial terminology native to a country.

**Table 4: Components' and Offices' Foreign Language Programs and Activities**

Programs and activities	Description	U.S. Coast Guard	U.S. Customs and Border Protection			Immigration and Customs Enforcement		
			OBP	OAM	OFO	DRO	OI	FIG
1. Language training <sup>a</sup>	Foreign language training (other than Spanish)	Partial	Partial	No	No	No	No	No
	Academy Spanish language training	No	Yes	Yes	Yes	Yes	No	No
	Post-academy self-guided, Web-based software	No	No	Partial	No	Yes	Yes	Yes
2. Proficiency testing <sup>b</sup>	Oral proficiency interview	Yes	No	No	Yes	Yes	Yes	No
	Automated over the phone	No	Yes	Yes	Yes	No	No	No
	Defense Language Proficiency Test 5 <sup>c</sup>	Yes	No	No	No	No	No	No
3. Contract services	Language services by contract	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Interagency agreements	Memorandums of understanding and other similar agreements between components and other agencies	No	No	No	No	Yes	Yes	Yes
	Agreements between components and other agencies to leverage language resources as needed	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5. Foreign language award programs <sup>d</sup>	A monetary award paid as an incentive for law enforcement officers with foreign language skills <sup>e</sup>	Yes	No	No	Yes	No	Yes	No

Source: GAO analysis of DHS and component documentation.

Legend: OBP = Office of Border Protection; OFO = Office of Field Operations; DRO = Office of Detention and Removal Operations; OI = Office of Investigations; FIG = Office of Intelligence; Yes = office manages the specified foreign language program or activity; No = office does not manage the specified foreign language program or activity; Partial = foreign language program or activity is temporarily managed, but not permanently established.

<sup>a</sup>Spanish training program proficiency is based on an evaluation on the ability to carry out certain tasks in Spanish and a passing score of 56 out of 80.

<sup>b</sup>Select components use different versions of a six-level scale to describe proficiency in language, also known as the Interagency Language Roundtable (ILR) Scale. The scale starts at zero—no knowledge of the given language—and goes up to five—proficiency equivalent to that of an educated native speaker of the language. App. III contains additional details on the ILR Scale.

<sup>c</sup>The Defense Language Institute produced this test, which is used to assess the general language proficiency of native English speakers in a specific foreign language, in the skills of reading and listening, and includes an oral proficiency interview.

---

<sup>4</sup>The foreign language award program provides, in general, a discretionary monetary award for the use of foreign language skills that is in addition to basic pay and does not increase an employee's base salary. Payment of the award is subject to the availability of funds.

<sup>5</sup>In general, under the foreign language award program provisions for law enforcement officers, the term "law enforcement officer" includes those personnel whose duties have been determined to be primarily the "investigation, apprehension, and detention of individuals suspected or convicted of offenses against the criminal laws of the U.S."

According to DHS officials in OCHCO, decisions on whether to establish programs and activities to develop foreign language capabilities are left to the discretion of individual components and are based on component operational capabilities and mission requirements. As shown in table 4, foreign language programs and activities varied across DHS and within select DHS components. For example, four of the seven component offices we reviewed maintain Spanish language training programs, and some of these offices require that officers complete Spanish language training before they are assigned to their duty stations. The five types of foreign language programs and activities used within and among the components are language training, proficiency testing, foreign language award programs, contract services, and interagency agreements.

- **Spanish language training.** Before officers can be assigned to their duty stations, some components require that they complete a Spanish language training program. Specifically, U.S. Border Patrol requires the completion of an 8-week task-based Spanish language training program. The Office of Field Operations has a 6-week basic Spanish training program requirement, and the Office of Air and Marine requires 6 weeks of task-based Spanish language training. The Office of Detention and Removal Operations has a requirement for a 6-week basic Spanish training program. These programs are designed to provide officers with a basic Spanish language competency. U.S. Border Patrol and Office of Air and Marine agents and officers are required to attend Spanish language training only if they do not pass a Spanish language proficiency exam.<sup>24</sup>
- **Foreign language proficiency tests.** Several proficiency tests are used by different components, and the type of test that is used depends

---

<sup>24</sup>U.S. Border Patrol and Office of Air and Marine agents and officers are administered a telephonic recognition Spanish proficiency test that is delivered over the telephone by a computerized testing system.

---

on the foreign language for which proficiency is being assessed.<sup>25</sup> The Coast Guard's proficiency test is produced by the Defense Language Institute and consists of a set of tests that include an oral interview to assess language proficiency in the skills of reading and listening. ICE's proficiency test consists of an oral interview for all foreign languages assessed, while CBP uses a combination of both oral and automated telephone tests for assessing proficiency in similar foreign languages, such as the Spanish language.

- **Contract services.** Contract services consist of contracts held by individual components and offices for interpreter and translation services. The use of language contract services depends on the unique requirements of the operation in individual offices. For example, the U.S. Border Patrol provides funding for translation services and the Coast Guard contracts annually for Haitian-Creole interpreter services. Select components utilize over-the-phone language contract services, while other components also utilize in-person translation and transcription contract services. Additionally, DHS's U.S. Citizenship and Immigration Services operates and manages the Language Services Section, comprising both intermittent and full-time language specialists who may provide assistance to some offices in CBP and ICE in certain cases.
- **Interagency agreements.** Interagency agreements consist of individual component offices establishing professional relationships with other federal, state, and local law enforcement agencies as a result of carrying out joint operations. Additionally, these agreements vary by component, office, and location, and may often depend on the extent to which other agencies in those areas work closely with DHS. The interagency cooperation we observed during our site visits largely occurs on an ad hoc basis. For example, component officials in Miami told us that local, state, and federal government officials provide translation assistance as needed without any written agreement between agencies.
- **Foreign language award programs.** The foreign language award program consists of certain DHS personnel voluntarily identified as being proficient in an authorized foreign language and meeting program requirements, including certain proficiency levels and

---

<sup>25</sup>The proficiency tests used by select components include (1) the DLPT 5, administered by the Defense Language Institute's Foreign Language Center for foreign language proficiency pay certification; (2) the Language Testing International test; (3) the FBI's test; (4) the Foreign Language Institute's test, which are used to conduct oral proficiency interviews; and (5) ordinate versant, which is an automated telephonic language proficiency test that measures broad-based language proficiency.

minimum usage requirements. As shown in table 5, the usage requirement and award payment vary by component. Specifically, the Coast Guard does not have a usage requirement, while CBP and ICE offices require that certain DHS staff use the language 10 percent of the time, or 208 hours each year. The usage requirement for special interest languages is only twice per 6-month increment. Further, Coast Guard interpreters receive up to \$200 each month and linguists receive up to \$300 each month, while CBP and ICE employees can receive up to 5 percent of basic pay as an award payment.

**Table 5: DHS Components' and Offices' with Foreign Language Award Programs**

Component and office	Staff eligible to receive award payments for foreign language skills	Usage requirement to receive award payments	Authorized foreign languages	Award	Total expenditures for FY 2009
U.S. Coast Guard	Coast Guard personnel	Not applicable	Spanish, Haitian-Creole, Russian, Vietnamese, Mandarin Chinese, Japanese, Korean, Arabic, French, Indonesian, Portuguese, and Tagalog <sup>a</sup>	Up to \$200 a month for an interpreter Up to \$300 a month for a linguist	\$600,000 <sup>b</sup>
U.S. Customs and Border Protection - Office of Field Operations	Only CBP officers and agriculture specialists <sup>c</sup>	Two uses biannually  10 percent = 208 hours annually	Arabic, Urdu, Farsi, Punjabi, Turkish, Uzbek, Tajik, Turkoman, Uighur, Somali, Amharic, Tigrinya, Bahasa, Tagalog, Kurdish, Russian, and Chechen <sup>d</sup>  All foreign languages	Up to 5 percent of basic pay	\$15,262,833
Immigration and Customs Enforcement - Office of Investigations	All law enforcement officers	10 percent = 208 hours annually	All foreign languages	Up to 5 percent of basic pay	\$1,834,316

Source: GAO analysis of DHS and component documentation.

<sup>a</sup>The Coast Guard annually determines what languages are encountered most in the field by obtaining information from Coast Guard leadership and operational units.

<sup>b</sup>The Coast Guard's active duty pay account is funded for foreign language proficiency pay as a yearly recurring rate for this amount.

<sup>c</sup>In general, under 19 U.S.C. § 267a, cash awards for foreign language proficiency may be paid to certain specified customs officers to the same extent and in the same manner as are allowable with respect to law enforcement officers under 5 U.S.C. 4521 et seq. In addition, according to CBP, the current state of its foreign language award program is a result of a negotiated agreement between CBP and the National Treasury Employee's Union.

<sup>d</sup>The Office of Field Operation's languages of special interest are not part of its 2004 assessment but were identified as part of the antiterrorism mission.

Components have established some language award programs as an incentive for certain DHS employees to develop foreign language

---

capabilities to address components' language needs. According to ICE officials, statutory language providing authorization for their foreign language award program is limited to those employees who meet a statutory definition of the term law enforcement officer.<sup>26</sup> For example, with respect to the law enforcement officer definition, intelligence research specialists in ICE have not been determined to meet such definition and be eligible to receive award payments for their use of foreign language skills. In addition, component requirements may also affect eligibility for foreign language awards. For example, according to CBP, although U.S. Border Patrol agents are law enforcement officers, Spanish language skills are a requirement for employment of that position, therefore agents do not receive award payments for their use of Spanish or other foreign language skills. Additionally, CBP told us that it is not opposed to assessing its options regarding foreign language needs.

While DHS components have a variety of foreign language programs and activities, DHS has not assessed the extent to which these programs and activities address potential shortfalls at the department or component levels. OPM's strategic workforce planning guidance recommends that agencies assess potential shortfalls in human capital resources, such as foreign language capability, by comparing needs against available skills. OCHO officials told us that DHS has not performed a department-level assessment of the extent to which the programs address potential shortfalls because DHS has delegated responsibility for foreign language programs to the components. However, we found that the Coast Guard, CBP, and ICE also have not assessed the extent to which their programs address potential shortfalls.

Although foreign language programs and activities at select components contribute to the development of DHS's foreign language capabilities, DHS's ability to use them to address potential foreign language shortfalls

---

<sup>26</sup>Statutory language (5 U.S.C. § 4521 et seq.) authorizing agencies to pay an incentive award to law enforcement officers who possess and make substantial use of one or more foreign languages in the performance of official duties define "law enforcement officer" to mean, in general, (1) those qualifying as law enforcement officers under Civil Service Retirement System (CSRS) or Federal Employees' Retirement System (FERS) laws and regulations and (2) members of certain other specified groups, such as a member of the United States Secret Service Uniformed Division, a member of the United States Park Police, and a special agent in the Diplomatic Security Service. In general, CSRS and FERS law enforcement officer definitional criteria include those personnel whose duties have been determined to be primarily the investigation, apprehension, or detention of individuals suspected or convicted of offenses against the criminal laws of the United States.

---

varies. For example, the foreign language training programs generally do not include languages other than Spanish, nor do they include various Spanish dialects.<sup>27</sup> According to several Coast Guard, CBP, and ICE officials we spoke with, their foreign language programs and activities were established to develop specific foreign language capabilities, primarily in Spanish. Officers we interviewed noted that these programs and activities generally do not account for variations of the Spanish language spoken in certain regions of the country, which can potentially have fatal consequences, particularly during undercover operations. Further, according to agents we interviewed in Puerto Rico, both the agents and criminals understand that the Spanish phrase “tumbarlo”<sup>28</sup> in the Caribbean region means “kill him,” while agents from the southern border understand this phrase to mean “arrest him.” As another example of the vital role of foreign language proficiency in certain operations, we were told that foreign language capabilities in one operation enabled an agent to infiltrate a prolific drug trafficking organization. While working in a long-term drug smuggling investigation, the agent came under suspicion by members of the trafficking organization. However, the agent was able to utilize Spanish language skills and dialect to avoid being discovered as a U.S. federal agent and escape execution by his captors.

Further, in certain cases, according to component officials, the programs and activities are not well suited for some operational needs. CBP and ICE officials noted that although their foreign language training programs and activities are used for the Spanish language, they maintain a language service contract for an over-the-phone, 24-hour translation service in over 150 languages. However, according to component officials we spoke with in the Coast Guard, CBP, and ICE, this resource is limited depending on the unique requirements of operations within and among components. Specifically, the component officials said that this resource is limited because of (1) the time it can take to obtain an interpreter over the phone, (2) difficulty in relying on over-the-phone interpretation while conducting operations at sea, and (3) the inability to use an interpreter who is over the phone for an on-the-spot discussion and resolution of an issue or problem encountered in the field. For example, officials stated that during an

---

<sup>27</sup>U.S. Border Patrol’s Spanish Training Program includes specific scenario activities (ranging from 10 to 50 minutes long) on how other cultures differ from the Mexican culture, including words and phrases not part of the formal Spanish language.

<sup>28</sup>The English translation for “tumbarlo” is “overthrow the . . . .”

---

operation in which they entered a house suspected of harboring individuals trafficked into the United States, an officer intercepted a phone call from one of the individuals who was involved in this illegal activity who spoke Russian. In other operations, according to intelligence analysts we spoke with, it is difficult or impossible to develop detainees' trust during phone interviews to obtain intelligence.<sup>29</sup> For example, according to all of the agents we interviewed, potential informants are difficult or impossible to recruit when the discussion is occurring through a third-party interpreter on the phone. Because the components have not assessed the programs and activities, they have not addressed this limitation.

Furthermore, these programs and activities are managed by individual components or offices within components. According to several Coast Guard, CBP, and ICE officials, they manage their foreign language programs and activities as they did prior to the formation of DHS. At the department level and within the components, many of the officials we spoke with were generally unaware of the foreign language programs or activities maintained by other DHS components. In addition, many of the Coast Guard, CBP, and ICE officials at all seven locations we visited stated that they relied on colleagues from current or past interactions to interpret or identify other foreign language resources. Given this decentralization, conducting an assessment of the extent to which its program and activities address shortfalls could strengthen DHS's ability to manage its foreign language programs and activities and to adjust them, if necessary, to address shortfalls.

---

## Conclusions

Since its formation in the aftermath of the September 11, 2001, terrorist attacks, DHS and three of its largest components—the Coast Guard, CBP, and ICE—have performed vital roles in carrying out a range of law enforcement and intelligence activities to help protect the United States against potential terrorist actions and other threats. To achieve its mission, it is important that DHS and its components manage their human capital resources in a way that ensures that fundamental capabilities, such as foreign language capabilities, are available when needed. Foreign language capabilities are especially important for DHS, as its employees frequently

---

<sup>29</sup>Intelligence research specialists report that as part of “operation last call,” they often conduct or participate in interviews designed to obtain intelligence information or investigative leads, primarily with respect to individuals of interest who are in ICE custody.

---

encounter foreign languages while carrying out their daily responsibilities. While DHS has taken limited actions to assess its foreign language needs and capabilities, it has not conducted a comprehensive assessment of the department's and its components' foreign language needs and capabilities nor has it fully identified potential shortfalls. Further, although the Coast Guard, CBP, and ICE have a variety of foreign language programs and activities in place, they have not assessed the extent to which the programs and activities they have established address foreign language shortfalls. As a result, DHS lacks reasonable assurance that its varied and decentralized foreign language programs and activities are meeting its needs.

We have recommended that other federal agencies, including the Departments of Defense and State and the FBI, take actions to help ensure that their foreign language capabilities are available when needed. Similar opportunities exist for DHS to help ensure that foreign language capabilities are available to effectively communicate and overcome language barriers encountered during critical operations, such as interdicting the transport of contraband and other illegal activities. Comprehensively assessing its foreign language needs and capabilities and identifying any potential shortfalls and the extent to which its programs and activities are addressing these shortfalls would better position DHS to ensure that foreign language capabilities are available when needed. Further, considering the important role foreign language plays in DHS's missions, incorporating the results of foreign language assessments into the department's future strategic and workforce planning documents would help DHS ensure that it addresses its current and future foreign language needs.

---

## Recommendations for Executive Action

To help ensure that DHS can identify its foreign language capabilities needed and pursue strategies that will help its workforce effectively communicate to achieve agency goals, we recommend that the Secretary of Homeland Security (1) comprehensively assess DHS's foreign language needs and capabilities and identify potential shortfalls, (2) assess the extent to which existing foreign language programs and activities address foreign language shortfalls, and (3) ensure that the results of these foreign language assessments are incorporated into the department's future strategic and workforce planning documents.

---

## Agency Comments and Our Evaluation

We provided a draft of our report to the Secretary of Homeland Security for review and comment on June 9, 2010. On June 14, 2010, DHS provided written comments, which are reprinted in appendix IV. In commenting on our report, DHS stated that it concurred with our recommendations and identified actions planned or under way to implement them.

Regarding our first recommendation that DHS comprehensively assess its foreign language needs and capabilities and identify potential shortfalls, DHS concurred and stated that OCHCO will work with the Office of Civil Rights and Civil Liberties to establish the DHS Joint Task Force consisting of those components and offices that have language needs in order to identify requirements and assess the necessary skills.

DHS also concurred with our second recommendation to assess the extent to which existing foreign language programs and activities address foreign language shortfalls, and stated that the DHS Joint Task Force will work to recommend a system for the department to track, monitor, record, and report language capabilities. DHS also stated that with respect to the foreign language skills required by DHS personnel stationed abroad, this task force will include the Office of International Affairs.

DHS also agreed with our third recommendation to ensure that the results of these foreign language assessments are incorporated into the department's future strategic and workforce planning documents and stated that OCHCO will ensure that DHS-wide language policies and processes are incorporated into the DHS *Human Capital Strategic Plan*.

DHS also provided written technical comments, which we considered and incorporated as appropriate.

---

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 to the Secretary of Homeland Security and interested congressional committees. The report also will be available at no charge on the GAO Web site at <http://www.gao.gov>.

---

If you or your staff have any questions about this report, please contact me at (202) 512-9627 or at [maurerd@gao.gov](mailto:maurerd@gao.gov). Contact points for our Offices 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 'D. Maurer', with a long horizontal flourish extending to the right.

David C. Maurer  
Director, Homeland Security and Justice Issues

---

# Appendix I: Scope and Methodology

---

To address our first and second objectives, we reviewed operations in three Department of Homeland Security (DHS) components and seven offices. We selected the U.S. Coast Guard, U.S. Customs and Border Protection (CBP), and Immigration and Customs Enforcement (ICE) because they constitute a broad representation of program areas whose missions include law enforcement and intelligence responsibilities. We selected the Coast Guard's Foreign Language Program Office; CBP's Office of U.S. Border Patrol, Office of Air and Marine, and Office of Field Operations; and ICE's Office of Detention and Removal Operations, Office of Investigations, and Office of Intelligence to ensure that we had a mix of different program sizes and a broad representation of program areas whose missions include law enforcement and intelligence responsibilities and are most likely to involve foreign nationals, foreign language documents, or both. We then selected a nonprobability sample of seven site visit locations—San Antonio and Laredo, Texas; Artesia, New Mexico; New York and Buffalo, New York; Miami, Florida; and San Juan, Puerto Rico—to identify and observe foreign language use at select DHS components. We selected these locations based on geographic regions, border locations, and language use. Although the results are not projectable, they provided us with valuable insights. During our site visits, we spoke to over 430 DHS staff in law enforcement and intelligence units, and observed the use of foreign language skills where foreign language capabilities are deemed vital to meeting mission requirements, including the following:

- We interviewed Coast Guard officials at the Command, Sector, District, and Stations and Intelligence and Enforcement representatives of the Coast Guard in New York, Miami, and San Juan. During an operational boat ride tour at Station Miami Beach, we observed an encounter involving Spanish-speaking individuals.
- We spoke with officials in ICE's Detention, Fugitive, Intelligence and Criminal Alien Operations units. We also observed interviewing and processing at five detention facilities and processing centers.
- We interviewed ICE intelligence research specialists who were sent to the southern border and Mexico City in support of operations, including Armas Cruzadas,<sup>1</sup> in 2009, and obtained information on arrests, seizures, and significant events. We also interviewed an intelligence research specialists who provided foreign language support in Spanish for ICE's 2009 gang surge operation and an analyst

---

<sup>1</sup>Armas Cruzadas is a DHS operation intended to identify, disrupt, and dismantle trans-border weapons smuggling networks.

---

who was sent to Haiti to conduct law enforcement training in the Haitian-Creole language, and obtained copies of reports needing translations.

- We spoke with ICE officials in the Drug Smuggling, Human Trafficking and Smuggling,<sup>2</sup> Worksite Enforcement, and Immigration and Customs Fraud units. We interviewed four Title III wiretap transcription monitor linguists in San Antonio and observed a targeted area of responsibility for surveillance composed of Spanish-speaking populations that select DHS components encounter while carrying out operations in New York City.
- We observed “Operation-Cooperation” at the Lincoln Juarez Bridge Number 2 at the Service Port of Entry in Laredo. The operation consisted of CBP border patrol agents and customs officers conducting outbound vehicle inspections to confiscate illegal weapons and cash. We also observed interviews and inspections, fingerprinting, and the permit/visa issuance process.
- We observed passenger processing<sup>3</sup> and interviews conducted by a passenger analysis unit and tactical group (PAU/TAG)<sup>4</sup> and passenger Enforcement Roving and Counter-Terrorist Response (CTR) teams<sup>5</sup> at the Miami and San Juan international airports.
- We observed the Border Patrol Laredo Sector’s initial processing of illegal immigrants at the Laredo North Station by 14 Border Patrol interns (referred to as interns by the U.S. Border Patrol while receiving post-academy training in the field).
- In addition, we interviewed members of the Border Patrol’s International Liaison Unit, Border Intelligence Center, and Joint Terrorism Task Force in Laredo, Buffalo, Miami, and San Juan.

---

<sup>2</sup>ICE defines human trafficking (exploitation-based) as the recruitment, harboring, and transportation of a person through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, among other things. ICE defines human smuggling (transportation-based) as the importation of people into the United States involving deliberate evasion of immigration laws, including transporting and harboring illegal persons.

<sup>3</sup>Passenger processing is the core process that includes all aspects of the processing of inbound and outbound air, sea, and land passengers; this process includes, but is not limited to, the initial processing and any secondary inspections.

<sup>4</sup>PAU/TAGs are units charged with using automated systems to target high-risk passengers, conducting threat analysis, or utilizing after-action reports to identify threats.

<sup>5</sup>A CTR team is made up of CBP officers assigned to special teams, drawing from personnel with prior counterterrorism, antiterrorism, or intelligence-related training or experience. Such a unit is charged with the interdiction of high-risk passengers attempting to facilitate entry of contraband or who are associated with terrorist activities.

- 
- We also interviewed officials in the Swanton Sector located on the northern border and reviewed documents on its Québécois French training initiatives.

During our site visit to Artesia, New Mexico we observed the Spanish Language Program at U.S. Border Patrol's Law Enforcement Academy at the Federal Law Enforcement Training Center. While conducting this site visit, we interviewed officers in training and program officials and examined documentation, such as training manuals, lessons, and videos on foreign language training development.

We also examined documentation on foreign language needs and capabilities, including DHS's strategic plans for fiscal years 2004 through 2008 and 2008 through 2013, human capital plans for fiscal years 2004 through 2008 and 2009 through 2013, and *Quadrennial Homeland Security Review Report* and *Work Force Planning Guidance* to determine whether DHS's plans provide details on how to address actual workforce needs, such as foreign language capabilities. Further, we interviewed knowledgeable officials in DHS's Office of the Chief Human Capital Officer and conducted over 430 interviews with component officials (component officials consist of Coast Guard members; Border Patrol agents; Air and Marine agents and officers; CBP officers and agriculture specialists; and ICE officers, special agents, and intelligence research specialists) for all the locations we visited to determine the extent to which they have assessed their foreign language needs and existing capabilities and identified any potential shortfalls. We also interviewed these component officials and other DHS staff to determine the extent to which they have foreign language programs in place to develop operational foreign language capabilities. We compared DHS activities to our and the Office of Personnel Management's (OPM) workforce planning criteria. We also examined and analyzed relevant studies and observed the use of foreign language proficiencies in a number of law enforcement operations. Finally, we considered our prior work on human capital strategic workforce planning related to foreign language needs and capabilities for the Departments of Defense and State and the Federal Bureau of Investigation.

We conducted this performance audit from December 2008 through June 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe

---

that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

# Appendix II: Human Capital Management and Workforce Planning Guidance

---

We and OPM have developed guidance for managing human capital and developing workforce planning strategies.

Strategic workforce planning helps ensure that an organization has staff with the necessary skills and competencies to accomplish its strategic goals. Since 2001, we have reported strategic human capital management as an area with a high risk of vulnerability to fraud, waste, abuse, and mismanagement. In January 2009, we reported that while progress has been made in the last few years to address human capital challenges, ample opportunities exist for agencies to improve in several areas.<sup>1</sup> For example, we reported that making sure that strategic human capital planning is integrated with broader organizational strategic planning is critical to ensuring that agencies have the talent and skill mix they need to address their current and emerging human capital challenges.<sup>2</sup>

We have also issued various policy statements and guidance reinforcing the importance of sound human capital management and workforce planning. Our 2004 human capital guidance states that the success of the workforce planning process that an agency uses can be judged by its results—how well it helps the agency attain its mission and strategic goals—not by the type of process used.<sup>3</sup> Our 2002 strategic human capital guidance also highlights eight critical success factors in strategic human capital management, including making data-driven human capital decisions and targeted investments in people.<sup>4</sup> To make data-driven human capital decisions, the guidance states that staffing decisions, including needs assessments and deployment decisions, should be based on valid and reliable data. Furthermore, the guidance states that to make targeted investments in people, organizations should clearly document the methodology underlying their human capital approaches. We have identified these factors, among others, as critical to managing human capital approaches that facilitate sustained workforce contributions.

Our 2004 guidance on strategic workforce planning outlines key principles for effective workforce planning. These principles include (1) involving

---

<sup>1</sup>GAO, *High-Risk Series: An Update*, [GAO-09-271](#) (Washington, D.C.: January 2009).

<sup>2</sup>See [GAO-04-39](#).

<sup>3</sup>See [GAO-04-39](#).

<sup>4</sup>See GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

---

management, employees, and other stakeholders in the workforce planning process; (2) determining critical skills and competencies needed to achieve results; (3) developing workforce strategies to address shortfalls and the deployment of staff; (4) building the capabilities needed to address administrative and other requirements important in supporting workforce strategies; and (5) evaluating and monitoring human capital goals.<sup>5</sup>

OPM has also issued strategic workforce planning guidance to help agencies manage their human capital resources more strategically.<sup>6</sup> The guidance recommends that agencies

- analyze their workforce needs,
- conduct competency assessments and analysis, and
- compare workforce needs against available skills.

Along with OPM, we have encouraged agencies to consider all available flexibilities under current authorities in pursuing solutions to long-standing human capital problems. In addition, our guidance outlines strategies for deploying staff in the face of finite resources.<sup>7</sup>

---

<sup>5</sup>See [GAO-04-39](#).

<sup>6</sup>Office of Personnel Management, *Key Components of a Strategic Human Capital Plan* (Washington, D.C., September 2005), and *Migration Planning Guidance Documents: Workforce Planning Best Practices* (Washington, D.C., May 2008).

<sup>7</sup>GAO, *Human Capital: A Self-Assessment Checklist for Agency Leaders*, [GAO/OCG-00-14G](#), Version 1 (Washington, D.C.: September 2000).

---

# Appendix III: Federal Interagency Language Roundtable Proficiency Scale

---

Federal agencies use the foreign language proficiency scale established by the federal Interagency Language Roundtable to rank an individual's language skills. The scale has six levels from 0 to 5—with 5 being the most proficient—for assessing an individual's ability to speak, read, listen, and write in another language. Proficiency requirements vary by agency and position but tend to congregate at the second and third levels of the scale. (See table 6.)

---

**Table 6: Federal Foreign Language Proficiency Levels**

<b>Proficiency level</b>	<b>Language capability requirements</b>
0 - None	No practical capability in the language.
1 - Elementary	Sufficient capability to satisfy basic survival needs and minimum courtesy and travel requirements.
2 - Limited working	Sufficient capability to meet routine social demands and limited job requirements. Can deal with concrete topics in past, present, and future tense.
3 - General professional	Able to use the language with sufficient ability to participate in most discussions on practical, social, and professional topics. Can conceptualize and hypothesize.
4 - Advanced professional	Able to use the language fluently and accurately on all levels normally pertinent to professional needs. Has range of language skills necessary for persuasion, negotiation, and counseling.
5 - Functionally native	Able to use the language at a functional level equivalent to a highly articulate, well-educated native speaker.

---

Source: Interagency Language Roundtable documents.

Note: When proficiency substantially exceeds one base skill level yet does not fully meet the criteria for the next base level, a plus sign (+) designation may be added.

---

# Appendix IV: Comments from the Department of Homeland Security

---



Homeland  
Security

June 14, 2010

David C. Maurer  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Maurer:

The Department of Homeland Security (DHS) appreciates the opportunity to review and comment on the Government Accountability Office (GAO) report, GAO-10-714: "*DHS Needs to Comprehensively Assess Its Foreign Language Needs and Capabilities and Address Shortfalls*". DHS generally concurs with the report's recommendations.

As GAO notes, Department components have been responsible for determining their foreign language requirements and for identifying and implementing methods for satisfying them. The Office of Civil Rights and Civil Liberties (CRCL) coordinates the Department's efforts in the area of Limited English Proficiency (LEP). Given the importance of language skills to the accomplishment of the agency's mission, the Office of the Chief Human Capital Officer (OCHCO) has considered GAO's recommendations and will take the following actions in the immediate future:

- OCHCO will ensure that DHS-wide language policies and processes are incorporated into our Human Capital Strategic Plan;
- OCHCO will work with CRCL to establish a DHS Joint Language Task Force consisting of those components and offices which have language needs in order to identify requirements and assess the necessary skills; recommend a system so that the Department can track, monitor, record, and report language capabilities; and identify the functional office responsible for managing DHS-wide language capabilities. This work will include the Office of International Affairs with respect to the foreign language skills required by DHS personnel stationed abroad.

---

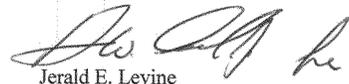
**Appendix IV: Comments from the Department  
of Homeland Security**

---

- 2 -

Again, we appreciate the opportunity to review and comment on this draft report and we look forward to working with you on future homeland security issues.

Sincerely,



Jerald E. Levine  
Director  
Departmental GAO/OIG Liaison Office

---

# Appendix V: GAO Contact and Staff Acknowledgments

---

## GAO Contact

David C. Maurer, (202) 512-9627 or [maurerd@gao.gov](mailto:maurerd@gao.gov)

---

## Acknowledgments

In addition to the contact named above, William W. Crocker III, Assistant Director; Yvette Gutierrez-Thomas, Analyst-In-Charge; Stephen L. Caldwell; Wendy Dye; Rachel Beers; Virginia Chanley; Geoffrey R. Hamilton; Lara Kaskie; Adam Vogt; Robert Lowthian; Candice Wright; Mona Nichols Blake; and Minty Abraham made key contributions to this report.

---

# Related GAO Products

---

*Language Access: Selected Agencies Can Improve Services to Limited English Proficient Persons.* [GAO-10-91](#). Washington, D.C.: April 26, 2010.

*Iraq: Iraqi Refugees and Special Immigrant Visa Holders Face Challenges Resettling in the United States and Obtaining U.S. Government Employment.* [GAO-10-274](#). Washington, D.C.: March 9, 2010.

*State Department: Challenges Facing the Bureau of Diplomatic Security.* [GAO-10-290T](#). Washington, D.C.: December 9, 2009.

*State Department: Diplomatic Security's Recent Growth Warrants Strategic Review.* [GAO-10-156](#). Washington, D.C.: November 12, 2009.

*Department of State: Persistent Staffing and Foreign Language Gaps Compromise Diplomatic Readiness.* [GAO-09-1046T](#). Washington, D.C.: September 24, 2009.

*Department of State: Comprehensive Plan Needed to Address Persistent Foreign Language Shortfalls.* [GAO-09-955](#). Washington, D.C.: September 17, 2009.

*Department of State: Additional Steps Needed to Address Continuing Staffing and Experience Gaps at Hardship Posts.* [GAO-09-874](#). Washington, D.C.: September 17, 2009.

*Military Training: DOD Needs a Strategic Plan and Better Inventory and Requirements Data to Guide Development of Language Skills and Regional Proficiency.* [GAO-09-568](#). Washington, D.C.: June 19, 2009.

*Defense Management: Preliminary Observations on DOD's Plans for Developing Language and Cultural Awareness Capabilities.* [GAO-09-176R](#). Washington, D.C.: November 25, 2008.

*State Department: Staffing and Foreign Language Shortfalls Persist Despite Initiatives to Address Gaps.* [GAO-07-1154T](#). Washington, D.C.: August 1, 2007.

*U.S. Public Diplomacy: Strategic Planning Efforts Have Improved, but Agencies Face Significant Implementation Challenges.* [GAO-07-795T](#). Washington, D.C.: April 26, 2007.

*Department of State: Staffing and Foreign Language Shortfalls Persist Despite Initiatives to Address Gaps.* [GAO-06-894](#). Washington, D.C.: August 4, 2006.

*Overseas Staffing: Rightsizing Approaches Slowly Taking Hold but More Action Needed to Coordinate and Carry Out Efforts.* [GAO-06-737](#). Washington, D.C.: June 30, 2006.

*U.S. Public Diplomacy: State Department Efforts to Engage Muslim Audiences Lack Certain Communication Elements and Face Significant Challenges.* [GAO-06-535](#). Washington, D.C.: May 3, 2006.

*Border Security: Strengthened Visa Process Would Benefit from Improvements in Staffing and Information Sharing.* [GAO-05-859](#). Washington, D.C.: September 13, 2005.

*State Department: Targets for Hiring, Filling Vacancies Overseas Being Met, but Gaps Remain in Hard-to-Learn Languages.* [GAO-04-139](#). Washington, D.C.: November 19, 2003.

*Foreign Affairs: Effective Stewardship of Resources Essential to Efficient Operations at State Department, USAID.* [GAO-03-1009T](#). Washington, D.C.: September 4, 2003.

*State Department: Staffing Shortfalls and Ineffective Assignment System Compromise Diplomatic Readiness at Hardship Posts.* [GAO-02-626](#). Washington, D.C.: June 18, 2002.

*Foreign Languages: Workforce Planning Could Help Address Staffing and Proficiency Shortfalls.* [GAO-02-514T](#). Washington, D.C.: March 12, 2002.

*Foreign Languages: Human Capital Approach Needed to Correct Staffing and Proficiency Shortfalls.* [GAO-02-375](#). Washington, D.C.: January 31, 2002.

---

## GAO's Mission

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

---

## Obtaining Copies of GAO Reports and Testimony

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

---

## Order by Phone

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

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

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

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Web site: [www.gao.gov/fraudnet/fraudnet.htm](http://www.gao.gov/fraudnet/fraudnet.htm)

E-mail: [fraudnet@gao.gov](mailto:fraudnet@gao.gov)

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

---

## Congressional Relations

Ralph Dawn, Managing Director, [dawnr@gao.gov](mailto:dawnr@gao.gov), (202) 512-4400  
U.S. Government Accountability Office, 441 G Street NW, Room 7125  
Washington, DC 20548

---

## Public Affairs

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

