

Report to Congressional Requesters

March 2017

# DEPARTMENT OF STATE

Foreign Language
Proficiency Has
Improved, but Efforts
to Reduce Gaps Need
Evaluation

Highlights of GAO-17-318, a report to congressional requesters

#### Why GAO Did This Study

Proficiency in foreign languages is a key skill for U.S. diplomats to advance U.S. interests overseas. GAO has issued several reports highlighting State's persistent foreign language shortfalls. In 2009, GAO recommended that State, to address these shortfalls, develop a strategic plan linking all of its efforts to meet its foreign language requirements. In response, in 2011 State issued its "Strategic Plan for Foreign Language Capabilities."

GAO was asked to build on its previous reviews of State's foreign language capabilities. In this report, GAO examines (1) the extent to which State is meeting its foreign language proficiency requirements for overseas posts as well as the effects of language proficiency and any gaps in State's ability to perform diplomatic duties, (2) State's process for identifying overseas posts' language proficiency needs and the extent to which the process addresses these reported needs, and (3) efforts State has taken to enhance foreign language proficiency and any effects of those efforts. GAO analyzed data on State's overseas language-designated positions; reviewed State strategic planning and policy documents; interviewed State officials; and visited overseas posts in China, Egypt, Korea, Mexico, and Russia.

#### **What GAO Recommends**

GAO recommends that the Secretary of State evaluate the effectiveness of efforts implemented under the "Strategic Plan for Foreign Language Capabilities." State agreed with our recommendation.

View GAO-17-318. For more information, contact Michael Courts at (202) 512-8980 or CourtsM@gao.gov.

#### March 2017

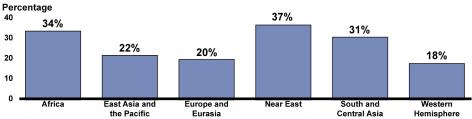
### DEPARTMENT OF STATE

## Foreign Language Proficiency Has Improved, but Efforts to Reduce Gaps Need Evaluation

#### **What GAO Found**

As of September 2016, 23 percent of overseas language-designated positions (LDP) were filled by Foreign Service officers (FSO) who did not meet the positions' language proficiency requirements. While this represents an 8-percentage-point improvement from 2008, the Department of State (State) still faces significant language proficiency gaps (see fig.). Regionally, the greatest gaps were in the Near East (37 percent), Africa (34 percent), and South and Central Asia (31 percent). According to FSOs we interviewed, language proficiency gaps have, in some cases, affected State's ability to properly adjudicate visa applications; effectively communicate with foreign audiences, address security concerns, and perform other critical diplomatic duties.

Percentages of Overseas Language-Designated Positions Filled by Officers Who Did Not Meet Proficiency Requirements as of September 2016, by Region



Source: GAO analysis of Department of State language-designated positions/language preferred positions

as of September 30, 2016. | GAO-17-318

State reviews overseas posts' language needs every 3 years, but the extent to which the reviews' outcomes address these needs is unclear. State's policies indicate that operational need should determine the designation of positions as LDPs and required proficiency levels. However, views expressed by geographic bureau officials and FSOs whom GAO met at overseas posts suggest that other factors, such as staffing and cost concerns, influence State's decisions about LDP designations and proficiency requirements. State Human Resources officials noted that State is taking steps to better align its LDP policies with its operational needs.

State has implemented most actions described in its 2011 "Strategic Plan for Foreign Language Capabilities" but has not evaluated the effects of these actions on language proficiency at overseas posts. According to State's evaluation policy, the department is committed to using performance management, including evaluation, to achieve the most effective foreign policy outcomes and greater accountability. Actions State has implemented under the plan include reviewing the language requirements of overseas posts every 3 years; offering recruitment incentives for personnel with proficiency in critically important languages; providing language incentive pay only for languages that reflect the department's highest strategic priorities; and using technology to strengthen and develop new approaches for language training and to complement FSOs' language skills. However, more than 5 years after it began implementing its strategic plan, State has not systematically evaluated the results of these efforts. As a result, State cannot determine the extent to which these efforts contribute to progress in increasing language proficiency worldwide and reducing proficiency gaps.

United States Government Accountability Office

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#### **Abbreviations**

AF Bureau of African Affairs

EAP Bureau of East Asian and Pacific Affairs
EUR Bureau of European and Eurasian Affairs

FAM Foreign Affairs Manual FSI Foreign Service Institute FSO Foreign Service officer

LDP language-designated position

LE staff locally employed staff LIP Language Incentive Pay

LTAM Language Training and Assignment Model

M/DGHR Bureau of Human Resources
NEA Bureau of Near Eastern Affairs
OIG State's Office of Inspector General
RLP Recruitment Language Program

RSO regional security officer State Department of State

SCA Bureau of South and Central Asian Affairs WHA Bureau of Western Hemisphere Affairs

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Washington, DC 20548

March 22, 2017

The Honorable Brian Schatz
Ranking Member
Subcommittee on Military Construction, Veterans Affairs, and Related
Agencies
Committee on Appropriations
United States Senate

The Honorable Amy Klobuchar United States Senate

Proficiency in foreign languages is a key skill for U.S. Foreign Service officers (FSO) to advance U.S. foreign policy and economic interests overseas. Effective diplomacy requires the ability to communicate clearly and persuasively with host-country interlocutors and local populations in their languages. In 2016, the Department of State (State), which has primary responsibility for U.S. diplomacy, required foreign language proficiency for 44 percent of its 10,111 overseas FSO positions. According to State's fiscal years 2016-2020 Five Year Workforce and Leadership Succession Plan, one of the department's workforce priorities is to strengthen employees' language skills. Over the years, we have issued several reports highlighting State's persistent shortages of staff with critical foreign language skills. 1 Most recently, in 2009, we reported that almost one-third of officers in language-designated positions (LDP) in 2008 did not meet the positions' proficiency requirements, despite a number of State initiatives to improve foreign language capabilities.<sup>2</sup> In our 2009 report, we recommended that State develop a comprehensive strategic plan that links all of its efforts to meet its foreign language requirements. In response, in 2011 State issued its "Strategic Plan for Foreign-Language Capabilities."

Building on our previous reports about State's foreign language capabilities, this report examines (1) the extent to which State is meeting its foreign language proficiency requirements for overseas posts as well

<sup>&</sup>lt;sup>1</sup>GAO, Department of State: Comprehensive Plan Needed to Address Persistent Foreign Language Shortfalls, GAO-09-955 (Washington, D.C.: Sept. 17, 2009); GAO, Department of State: Staffing and Foreign Language Shortfalls Persist Despite Initiatives to Address Gaps, GAO-06-894 (Washington, D.C.: Aug. 4, 2006).

<sup>&</sup>lt;sup>2</sup>GAO-09-955.

as the effects of language proficiency and any gaps in State's ability to perform diplomatic duties, (2) State's process for identifying overseas posts' language proficiency needs and the extent to which the process addresses posts' reported needs, and (3) efforts State has taken to enhance foreign language proficiency and any effects of those efforts.<sup>3</sup>

To examine the extent to which State is meeting its foreign language requirements as well as the potential effects of language proficiency and any gaps, we analyzed data provided by State that listed all overseas LDPs and the language skills of the incumbents filling the positions as of September 30, 2016. We interviewed State officials responsible for the collection of LDP data and determined the data to be reliable for our reporting purposes and analysis. To examine State's process for identifying overseas posts' language proficiency needs and the extent to which the process addresses posts' reported needs, we reviewed State human resource documents, such as memorandums and cables, as well as previous GAO and State Inspector General reports. To examine actions State has taken to enhance foreign language proficiency, we reviewed State's human resource documents, including the 2011 "Strategic Plan for Foreign-Language Capabilities" and the 2016-2020 workforce plan. We compared steps State has taken to the objectives described in the "Strategic Plan for Foreign-Language Capabilities" and assessed whether they have been evaluated in accordance with State's Evaluation Policy and federal internal control standards. In addition, we interviewed officials from State's Bureaus of Human Resources (MDGHR) and Consular Affairs, six geographic bureaus, and the Foreign Service Institute (FSI). We also interviewed State officials at posts in China, Egypt, Korea, Mexico, and Russia.

We conducted this performance audit from February 2016 to March 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and

<sup>&</sup>lt;sup>3</sup>In this report, "overseas posts" refers to both U.S. embassyand U.S. consulate locations outside the United States.

<sup>&</sup>lt;sup>4</sup>GAO, Standards for Internal Control in the Federal Government, GAO-14-704G (Washington, D.C.: September 2014).

conclusions based on our audit objectives. Appendix I provides a detailed explanation of our objectives, scope, and methodology.

### Background

To ensure that its diplomatic corps can communicate in the languages of host countries, State requires that FSOs assigned to LDPs at overseas posts meet minimum specified competency levels for both speaking and reading. As of September 30, 2016, State had 4,461 overseas positions worldwide that required language proficiency and 872 overseas positions where proficiency was preferred but not required, known as language-preferred positions.<sup>5</sup>

State categorizes foreign languages according to the time required for a native English speaker to learn them:

- Category —World languages (e.g., French and Spanish)
- Category Il—Difficult world languages (e.g., German)
- Category III—Hard languages (e.g., Russian and Urdu)
- Category IV—Super-hard languages (e.g., Arabic and Chinese)

According to State documents, the time it takes to achieve general proficiency depends on the difficulty of the language. World languages require 24 to 30 weeks, difficult world languages require 36 weeks, hard languages require 44 weeks, and super-hard languages require 88 weeks to achieve general proficiency.

State groups countries of the world into areas of responsibility under six geographic bureaus:

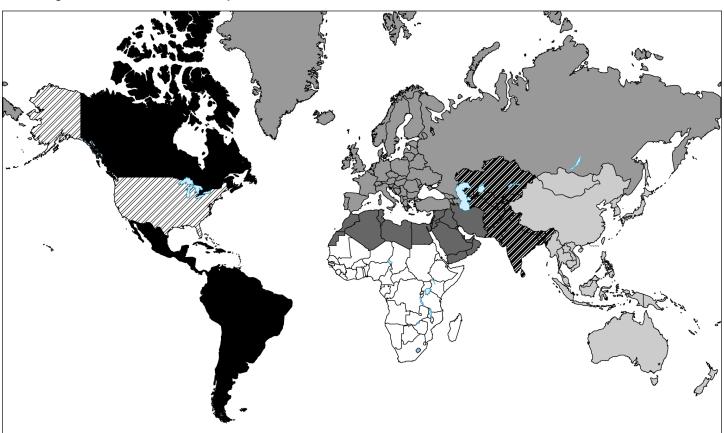
- Bureau of African Affairs (AF)
- Bureau of East Asian and Pacific Affairs (EAP)
- Bureau of European and Eurasian Affairs (EUR)
- Bureau of Near Eastern Affairs (NEA)
- Bureau of South and Central Asian Affairs (SCA)
- Bureau of Western Hemisphere Affairs (WHA)

<sup>&</sup>lt;sup>5</sup>As of September 2016, 324 of the 4,461 overseas were dual LDPs—that is, positions with a primaryand a secondarylanguage designation. According to State officials, FSOs can meet the language requirement for these positions by achieving proficiency in either the primaryor the secondarylanguage.

The number of overseas LDPs varies significantly by bureau, with the highest number (1,491) at WHA posts and the lowest (233) at SCA posts. Most LDPs requiring category I and II languages are at AF, EUR, and WHA posts, while most LDPs requiring category III and IV languages are in EAP, EUR, NEA, and SCA. Three of the four super-hard languages (Chinese, Korean, and Japanese) are spoken in the countries in EAP's area of responsibility; the remaining super-hard language (Arabic) is widely spoken throughout the NEA area. The percentages of Foreign Service positions that are LDPs also vary by geographic bureau, with the highest percentage under WHA.

Figure 1 shows the geographic bureaus' areas of responsibility and numbers of LDPs relative to the numbers of Foreign Service positions.

Figure 1: State Department Geographic Bureaus' Areas of Responsibility and Numbers of Overseas Language-Designated and Foreign Service Positions, as of September 2016



Region	Number of language- designated positions	Number of Foreign Service positions	Percentage of Foreign Service positions that are language-designated positions
Bureau of African Affairs	387	1,328	29
Bureau of East Asian and Pacific Affairs	809	1,716	47
Bureau of European and Eurasian Affairs	1,061	2,443	43
Bureau of Near Eastern Affairs	480	1,380	35
Bureau of South and Central Asian Affairs	233	1,231	19
Bureau of Western Hemisphere Affairs	1,491	2,013	74
Other	Not applicable	Not applicable	Not applicable
Total	4,461	10,111	44

Sources: GAO analysis of Department of State language-designated positions/language preferred positions as of September 30, 2016 (data); Map Resources (map). | GAO-17-318

State uses 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 0 indicating no practical capability in the language and 5 indicating highly articulate, well-educated, native-speaker proficiency—to identify a language learner's ability to speak, read, listen, and write in another language. General professional proficiency in speaking and reading—3/3 (speaking/reading)—is the minimum level required for most Foreign Service generalist LDPs. According to State's fiscal years 2016-2020 Five Year Workforce and Leadership Succession Plan, this level of proficiency provides officers with the ability to participate in most formal and informal discussions of practical, social, and professional topics. Some entry-level Foreign Service generalist and most Foreign Service specialist LDPs are designated at or below the 2/2 level. Table 1 shows the language skill requirements for each proficiency level.

<sup>&</sup>lt;sup>6</sup>The Interagency Language Roundtable is an unfunded federal interagency organization that coordinates and shares information about language-related activities at the federal level.

<sup>&</sup>lt;sup>7</sup>The scale allows for half steps for cases in which an individual demonstrates proficiency beyond a given level but has not reached proficiency at the next level. For example, a 3+ speaking would indicate that an individual has achieved speaking proficiency higher than 3 but has not reached a proficiency of 4.

<sup>&</sup>lt;sup>8</sup>FSOs include both generalists and specialists. According to State's Guide to the Foreign Service Selection Process, Foreign Service generalists enter in one of five career tracks—consular, economic, management, political, or public diplomacy—with no specific requirement for education or experience. Foreign Service specialists provide technical support or administrative services in 20 job fields that are grouped into eight categories, including administration, Construction Engineering, Facility Management, Information Technology, International Information and English Language Programs, Medical and Health, Office Management, and Security.

Proficiency level	Language capability requirements
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 formal and informal discussion on practical, social, and professional topics. Can conceptualize and hypothesize
4 - Advanced professional	Able to use the language fluently and accurately in 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 that of a highly articulate, well-educated native speaker.

Source: Summary compiled by GAO from Interagency Language Roundtable document. | GAO-17-318

The difference between the second and third proficiency levels—the ability to interact effectively with native speakers—is significant in terms of training costs and productivity for certain languages. For example, State provides about 44 weeks of training to bring a new speaker of a language classified as super-hard, such as Arabic, up to the second level. Moving to a level-3 proficiency usually requires another 44 weeks of training, which is generally conducted at field schools overseas. In contrast, State provides 24 weeks of training to bring a new speaker of most "world" languages to a level 3.

State primarily uses language training—typically at the FSI—to meet its foreign language requirements. FSI's School of Language Studies offers training in about 70 languages. State also offers full-time advanced training in super-hard languages at a few overseas locations, including Beijing, China; Seoul, South Korea; and Taipei, Taiwan, among other locations. In addition, overseas posts offer part-time language training through post language programs, and FSI offers distance learning courses to officers overseas.

State Has Improved
Foreign Language
Proficiency but Faces
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Diplomatic
Operations

Since October 2008, State has reduced the number of LDPs staffed by FSOs who do not meet language requirements by 8 percentage points, from 31 to 23 percent. However, State continues to face notable shortfalls in meeting its foreign language requirements for overseas LDPs that may adversely affect diplomatic operations. State officials we met with in Washington, D.C., and at overseas posts identified various challenges that may affect State's ability to address its foreign language shortfalls. Additionally, according to FSOs we interviewed, both language proficiency and gaps in proficiency have, in some cases, affected State's ability to, for example, properly adjudicate visa applications, effectively communicate with foreign audiences, and perform other critical diplomatic duties.

State Has Made Some Progress in Improving Foreign Language Proficiency since 2008 The percentage of overseas LDPs staffed by FSOs who did not meet the positions' language proficiency requirements has decreased since October 2008 (see table 2). As of September 30, 2016, 23 percent of overseas LDPs were staffed by FSOs who did not meet both the speaking and reading proficiency requirements for their positions; According to State officials, State granted language waivers to most of these FSOs.<sup>9</sup> In contrast, as of October 2008, 31 percent of FSOs in overseas LDPs did not meet these requirements.<sup>10</sup>

<sup>&</sup>lt;sup>9</sup>A foreign language waiver may be requested when an FSO is assigned to an LDP and does not meet the LDP's foreign language proficiency requirements. Once granted, the waiver is valid for the duration of the FSO's tour. According to State, the foreign language waiver documents the language ability, if any, of the FSO and how State will mitigate any challenges resulting from the FSO's lack of foreign language proficiency. In 2015, State granted a total of 384 full and partial foreign language waivers for the year.

<sup>&</sup>lt;sup>10</sup>See GAO-09-955.

Table 2: Overseas Language-Designated Positions Staffed by Foreign Service Officers Who Did or Did Not Meet Language Proficiency Requirements, as of September 2016 and October 2008

			Staffed language	-designated positions <sup>a</sup>
Date	Total LDPs	Total staffed LDPs	Percentage of LDPs staffed by FSOs who met requirements	Percentage of LDPs staffed by FSOs who did not meet requirements
September 2016	4,461	4,002 <sup>b</sup>	77	23
October 2008	3,599	3,265 <sup>c</sup>	69	31

Legend: LDP = language-designated position, FSO = Foreign Service officer

Source: GAO analysis of U.S. Department of State data. | GAO-17-318

However, the proficiency shortfall widens when unstaffed positions are included. As of September 2016, 69 percent (3,077 of 4,461) of overseas LDPs were staffed by FSOs who met both the speaking and the reading requirements, while 31 percent (1,384 of 4,461) of LDPs either were staffed by FSOs who did not meet the positions' requirements or remained vacant. 11 State officials noted that, among other factors, the overall increase of LDPs from 2008 through 2016 contributed to the slow progress in improving the rate of LDPs filled by FSOs who meet the positions' requirements. 12 State officials also noted that many of the new LDPs require proficiency in hard or super-hard languages, which entails 44 to 88 weeks of training. The officials further stated that, given the absence of an existing cadre of foreign-language speakers who can be staffed to LDPs, many positions may go unstaffed. 13

<sup>&</sup>lt;sup>a</sup>Percentages show nexclude vacant positions.

<sup>&</sup>lt;sup>b</sup>As of September 2016, 459 LDPs were vacant.

<sup>&</sup>lt;sup>c</sup>As of October 2008, 334 LDPs were vacant.

<sup>&</sup>lt;sup>11</sup>In October 2008, 63 percent of overseas LDPs (2,260 of 3,599) were staffed by FSOs who met both the speaking and the reading requirements, while 37 percent (1,339 of 3,599) of LDPs either were staffed by FSOs who did not meet the positions' speaking and reading requirements or remained vacant

<sup>&</sup>lt;sup>12</sup>According to State data, LDPs increased by 862 positions from October 2008 to September 2016.

<sup>&</sup>lt;sup>13</sup>According to State M/DGHR officials, the most significant factor contributing to gaps in filling LDPs with qualified officers, as well as filling vacant LDPs, is the lack of full funding for the training float. A training "float" is an informal term to describe having additional staff on hand to cover the workload given a percentage of staff not present because of training or transition. M/DGHR officials added that State has made several budgetary requests over the years to increase the training float, but they have not been fully funded.

State Faces Significant
Proficiency Gaps in
Priority Languages and
Regions That Are of
Critical Importance to U.S.
Foreign Policy

While language proficiency gaps vary among posts, State faces some of its largest proficiency gaps in several priority languages. According to State M/DGHR officials, State designates languages as priority for various reasons. For example, Mandarin Chinese, Dari, Farsi, Pashto, Hindi, Urdu, Korean, and Arabic—languages spoken in China, Iran, India, Korea, and throughout the Near East—are priority languages. State defines priority languages as languages that are of critical importance to U.S. foreign policy, are experiencing severe shortages or staffing gaps, or present specific challenges in recruiting and training. In addition, officials from State's Bureau of Consular Affairs identified Mandarin Chinese and Spanish, among others, as priority languages, citing the need for language-qualified entry-level professionals to provide consular services in countries where these languages are spoken as well as reduced entry-level hiring and resultant staffing gaps in LDPs worldwide. 14

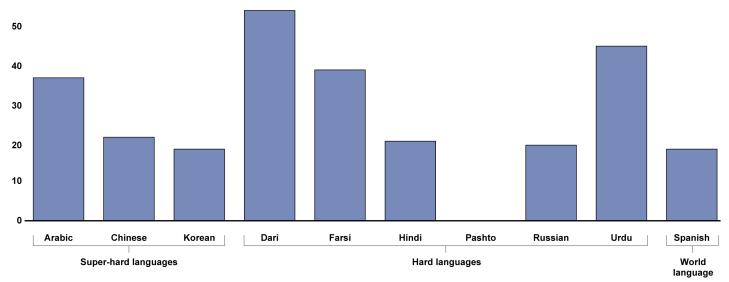
As figure 2 shows, as of September 2016, the largest proficiency gaps for priority languages were in Arabic, Dari, Farsi, and Urdu. According to State data, 36 percent of LDPs requiring Arabic (106 of 291 LDPs), 53 percent of LDPs requiring Dari (9 of 17 LDPs), 36 percent of LDPs requiring Farsi (9 of 26 LDPs), and 44 percent of LDPs requiring Urdu (12 of 27 LDPs) were staffed by FSOs who did not meet the proficiency requirements for the positions.<sup>15</sup>

<sup>&</sup>lt;sup>14</sup>State's Bureau of Consular Affairs identified Arabic, French, Mandarin Chinese, Portuguese, Russian, and Spanish as the six priority languages for the bureau.

<sup>&</sup>lt;sup>15</sup>State does not include LDP vacancies when calculating language proficiency gaps. As of September 2016, 80 Arabic LDPs, 5 Dari LDPs, 7 Farsi LDPs, and 4 Urdu LDPs remained vacant.

Figure 2: Percentages of Overseas Language-Designated Positions Filled by Foreign Service Officers Who Did Not Meet Proficiency Requirements, by Priority Language, as of September 2016

Percentage (of language-designated positions filled by officers who did not meet requirements) 60

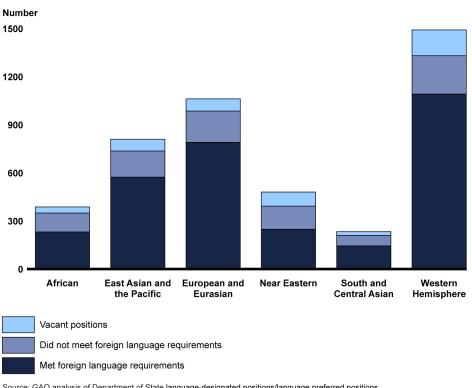


Source: GAO analysis of Department of State language-designated positions/language preferred positions as of September 30, 2016. | GAO-17-318

Note: Each priority language in this graphic has at least one Dual-Language Designated Position (LDP). Dual-LDPs are positions with a primary and secondary language designation. There are 264 Dual-LDPs out of 2,223 LDPs in priority languages included in this analysis. For the purpose of this analysis, if the Foreign Service officer did not meet the speaking and reading requirements for either the primary or secondary designated languages, the positions' primary language w as used to calculate the percentage of LDPs that did not meet language requirements.

State continues to face proficiency gaps worldwide, most notably in priority languages categorized as hard or super-hard. Some of the most significant gaps are found in NEA, AF, and SCA (see fig. 3). In NEA, 144 of 392 LDPs (37 percent) were staffed by officers who did not meet the positions' proficiency requirements; 88 LDPs were vacant. In AF, 118 of 349 LDPs (34 percent) were staffed by officers who did not meet the positions' proficiency requirements; 38 LDPs were vacant. In SCA, 66 of 210 LDPs (31 percent) were staffed by officers who did not meet the positions' proficiency requirements; 23 LDPs were vacant.

Figure 3: Numbers of Overseas Language-Designated Positions Filled by Foreign Service Officers Who Met Proficiency Requirements, Filled by Foreign Service Officers Who Did Not Meet the Requirements, and Vacant as of September 2016, by Geographic Bureau



Source: GAO analysis of Department of State language-designated positions/language preferred positions as of September 30, 2016. | GAO-17-318

State Officials Identified Challenges That May Affect State's Ability to Address Language Shortfalls

State officials we interviewed said that several challenges, including some that are unrelated to language proficiency, may affect the department's ability to staff LDPs with officers who meet both the speaking and reading requirements for the positions. According to these officials, language proficiency shortfalls are partially attributable to the following factors:

 Long training periods. Training to achieve general proficiency in hard and super-hard languages can take up to 2 years. According to State officials, this may result in a position going unfilled, given the absence of an existing cadre of foreign-language speakers who can be staffed to LDPs. FSOs we spoke with stated that the length of time it takes to achieve a 3/3—the minimum standard for general proficiency—in a hard or super-hard language may discourage some officers from applying for positions that require proficiency in these languages. According to State, for an FSO with no previous language experience, achieving a 3/3 generally takes 44 weeks of study for a hard language and 88 weeks for a super-hard language.

- Heritage-speaker restrictions. Because of security concerns, in certain instances State does not allow Chinese or Russian "heritage speakers" to serve in their ancestral countries if they have relatives there. In addition, according to State officials, Egypt does not grant diplomatic status to Americans with dual citizenship or who have a claim to Egyptian citizenship, which limits State's ability to staff LDPs in Egypt with FSOs who speak Arabic. According to a State official, heritage speakers can leverage their native level of proficiency to better understand subtle language cues that may be missed by nonnative speakers. For example, State officials in China and Korea stated that to effectively monitor social media requires someone to be a near-native speaker in order to understand language tone and nuance.
- Restrictions on tour frequency and length. According to State officials, State does not encourage FSOs to serve consecutive tours in the same country and generally limits each tour to a maximum of 2 or 3 years. In a country that we visited, an official told us that State's current system actively discourages FSOs from serving multiple tours in the same country because of concerns that the FSOs may lose objectivity or begin to view issues from the host country's, rather than the U.S. government's, perspective. In addition, according to State officials, there has been an increase in 1-year tours in countries where hard and super-hard languages are spoken. Given that language training can take up to 2 years for hard and super-hard languages, FSOs may not be willing to undergo such extensive training for a 1-year position.
- Tour curtailments and staff rotations. According to some State officials, constant movement of staff—often because of officers' curtailing their tours to attend family or medical issues or rotating to another location after they have reached the maximum allowed term in a given post—contributes to LDPs' remaining vacant or being staffed with personnel who do not meet the positions' language requirements. For example, a regional security officer (RSO) at a post we visited stated that although multiple RSOs at that post had ended their tours and left their positions, no replacement RSOs had met the positions' foreign language proficiency requirements. As a result, several LDPs remained unfilled, and the remaining RSOs had to make up for the shortfall in staff. Additionally, according to State officials, certain LDPs in Iraq and Afghanistan that are deemed "no-

gap posts" must be filled by available FSOs regardless of whether they meet the proficiency requirements.

Foreign Language
Proficiency Can Positively
Affect Various Aspects of
U.S. Foreign Service,
while Proficiency Gaps
Have Negative Effects

Current and former FSOs, including ambassadors, whom we interviewed, reported positive and negative effects, respectively, of language proficiency and of proficiency gaps on officers' ability to perform critical diplomatic functions (see table 3). State documents also report such effects.

Table 3: Reported Positive Effects of Language Proficiency and Negative Effects of Proficiency Gaps on Foreign Service Officers' Performance of Diplomatic Functions

#### Positive effects of language proficiency

#### Negative effects of language proficiency gaps

#### Consular operations

Language proficiency enables consular officers to obtain information required to appropriately adjudicate visas and perform other consular functions. The following are examples:

- One Foreign Service officer (FSO) reported that, during a visa interview in China, the applicant's responses raised questions about his credibility. The consular officer further investigated the case by reviewing the website of the applicant's employer. While the English language version was nondescript, the Chinese version indicated that the company was involved in antistealth technology and ballistic missile development and that, pursuant to section 212 of the Immigration and Nationality Act, the applicant might not be eligible for a visa. Because of the officer's language proficiency, he determined it was appropriate to deny the applicant a visa, and he found other applicants in the same group who were also ineligible under the law.
- Consular officers at one post we visited reported instances in which visa paperwork for applicants appeared to be in order (e.g., showed previous international travel) but in-person interviewing in the local language uncovered visa fraud, including a sex-worker ring involved in human trafficking.
- Consular officers working in the American Citizens
   Services unit at one post we visited said that language
   proficiency enables them to assist American citizens who
   have emergency situations, such as medical crises, and
   need language-proficient officers at embassies and
   consulates to communicate on their behalf with local
   institutions, such as hospitals and police stations.

Miscommunication and misunderstandings during consular interviews can contribute to a degradation of customer service and incorrect visa adjudication decisions. The following are examples:

- Consular officers at two posts we visited said that they had witnessed cases in which visas had been incorrectly granted or denied because officers had not understood applicants' responses.
- A senior FSO at one post we visited reported that consular officers who do not meet the language requirement do not work as efficiently as their language-proficient colleagues. Because they cannot speak as quickly, ask open-ended questions, understand nuanced responses, or multitask (e.g., take fingerprints and notes and ask questions at the same time), officers who are not language proficient fall behind in processing visas.

#### Positive effects of language proficiency

#### Negative effects of language proficiency gaps

#### Security

Language proficiency enables security officers to identify and respond to potential threats and security incidents. The following is an example:

 Officers cited cases in which security officers' language skills enabled them to communicate and coordinate with local authorities regarding security incidents. For example, a diplomat trying to enter the embassy in Moscow after hours was stopped by, and became involved in, an altercation with Russian security forces posted outside the embassy. However, the language proficiency of the security officers at the embassy enabled them to effectively communicate with the Russian security and police forces, who only spoke Russian, to file a police report and address the situation.

Lack of foreign language skills limits security officers' situational awareness and ability to efficiently and effectively address security incidents and communicate with local security forces. The following are examples:

- The December 2012 report by the Accountability Review Board that State convened to investigate the attacks on the mission in Benghazi, Libya, stated that the lack of Arabic skills among most American personnel assigned to Benghazi and the lack of a dedicated, locally employed staff interpreter and sufficient local staff served as a barrier to effective communication and situational awareness at the mission. The report recommended, among other things, that State enhance its ongoing efforts to significantly upgrade its language capacity, particularly for Arabic, among American employees, including U.S. security personnel.
- Security officers at a post where a super-hard language is spoken told us that difficulty in communicating with the local guard force limits their ability to protect and secure the embassy.
- A security officer in a Spanish-speaking countrysaid that, while his language skills are adequate for day-to-day functions, he needs greater proficiency and more job-specific Spanish to deal with life-and-death and emergency situations.

#### **Public diplomacy**

Language proficiency assists public diplomacy officers in communicating U.S. foreign policy and other messages to foreign audiences, including host-country interlocutors and local populations. The following is an example:

Officers cited cases in which language skills helped them to effectively communicate with protestors who were critical of U.S policy. For example, a delegation of FSOs traveling from Moscow, Russia, to give a speech on U.S. policy was greeted by a group of journalists and protesters outside the speaking venue. The protesters alleged that the U.S. embassy was actively trying to undermine the Russian government. One of the FSOs in the group spoke Russian and was able to address the journalists' and protesters' questions, allowing the U.S. delegation to correctly explain the U.S. government's intentions and dees calate the situation.

Insufficient foreign language skills limit officers from effectively communicating with foreign audiences. The following are examples:

- An FSO reported that press officers' inability to speak Arabic limits their ability to develop relationships with Egyptian journalists and understand local talk shows or newscasts, thus limiting the amount of information they are able to obtain.
- An FSO reported that when the embassyin Cairo hosted a Ramadan cultural event, American FSOs were generally not able to communicate with the Egyptian attendees, including government officials and local media contacts, because of the FSOs' inadequate Arabic proficiency.

#### Positive effects of language proficiency

#### Negative effects of language proficiency gaps

#### Political and economic affairs

Language proficiency as sists economic and political officers in Lack of foreign language proficiency skills limits officers' range of understanding countries' political and economic policies and plans; reviewing news stories and articles as well as information on social media; obtaining a broader range of contacts with nongovernmental organizations, government institutions, and academic entities; and effectively negotiating treaties, among other activities. The following are examples:

- Economic affairs. An FSO said that, when economic officers in China reviewed a Chinese economic plan, their language skills enabled them to detect subtle but important nuances in the plan that provided insight into the Chinese government's commitment to market reform. In another example, an economic officer reported that, during meetings regarding U.S.-China cybers ecurity issues, a diplomat with level-3+ proficiency engaged in an all-night negotiation session with Chinese officials to explain the U.S. position and finalize documents on the outcomes of the bilateral collaboration. The economic officer involved in the discussions said that he could not have achieved that outcome with his level-3 proficiency.
- Political affairs. When the embassyin Moscow received a diplomatic message from the Russian government regarding a military cooperation program, a languageproficient officer at the embassy was able to accurately translate the sensitive document and convey the tone and nuances of the message to the White House. In another example, post officers' language proficiency skills in Mandarin Chinese enabled them to obtain information from their Chinese counterparts about China's reactions and position in response to a round of North Korean nuclear missile tests before this information was made public. As a result, the post was able to promptly report China's position to the White House.

contacts as well as their understanding of communications during meetings with foreign government officials, in turn limiting the depth of posts' political and economic reporting. The following are examples:

- **Economic affairs.** A manager in the economic section of one of the posts we visited said that the section had a trade officer who did not meet the language proficiency requirement. As a result, the officer was only able to cover essential meetings and to focus only on high-level is sues rather than specialized subject areas.
- Political affairs. An officer who lacked language proficiency sent an e-mail in English to a foreign ministry, which his manager said would delay the ministry's response and lead to a smaller audience at the ministry.

#### Development of relationships with foreign counterparts

FSOs said that foreign language proficiency facilitates greater cooperation, enhanced communication, appreciation, rapport and respect, and better access and helps them build and improve relationships with their host-country contacts.

Lack of foreign language proficiency can adversely affect U.S. relationships with foreign counterparts. The following is an example:

A senior economic officer at a post we visited reported an instance in which a foreign ministry was dissatisfied by an aspect of a speech given in English by the U.S. Ambassador, which was not accurately translated by the local press. When a senior official at the foreign ministry contacted his American counterpart, the American official lacked the language proficiency to directly resolve the misunderstanding.

#### Positive effects of language proficiency

#### Negative effects of language proficiency gaps

#### Management

Language proficiency assists management officers in negotiating with local service providers and landlords and reviewing bills for goods and services the post has acquired to help ensure that U.S. resources are being used appropriately. The following is an example:

Lack of foreign language skills can limit management officers' ability to effectively review financial documents, such as leases and contracts in written foreign languages, and thus to prevent misuse of U.S. government resources.

 An FSO reported that, when the Russian currency collapsed, a management officer used Russian language skills to research the legal requirements and policies on compensation for locally employed staff.

Source: GAO analysis of interviews with overseas FSOs and Department of State documents. | GAO-17-318

Post Officials Reported Using Locally Employed Staff to Help Mitigate Language Proficiency Gaps in Some Instances

To mitigate the impact of language proficiency gaps, post officials told us that in some instances they leverage the foreign language skills of locally employed staff (LE staff). According to post officials, FSOs may ask LE staff to draft or translate e-mails, schedule meetings, and translate during meetings, among other tasks. However, post officials said that there are limitations to using LE staff. For example, FSOs said that they cannot rely on LE staff for language support when discussing politically sensitive issues and that using LE staff as translators is less desirable than having a firsthand conversation with an external contact. In addition to using LE staff, officers also rely on professional translators and interpreters for language assistance.

State Reviews
Language Proficiency
Requirements Every
3 Years, but Extent to
Which This Process
Addresses Posts'
Reported Needs Is
Unclear

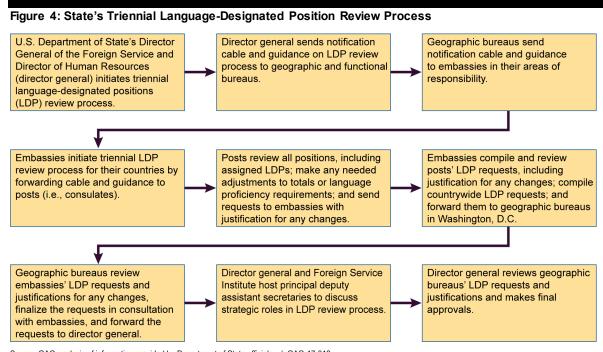
State Determines
Language Proficiency
Requirements Primarily
through Triennial Review
of Existing LDPs

According to State officials, State conducts a review of all LDPs every 3 years to reevaluate posts' language needs. State officials in Washington, D.C., described this triennial review as a post-driven exercise, stating that each post is best positioned to understand its language needs. According to a State memo, the triennial review is the foundation for applying foreign language designations and establishing State's language policies.

In April 2010, in response to a recommendation in our 2009 report, <sup>16</sup> State's Director General of the Foreign Service and Director of Human Resources implemented an updated LDP review process to occur every 3 years, replacing a previously annual cycle. According to State documents, the updated process requires State's geographic bureaus; Bureaus of Diplomatic Security, Consular Affairs, and International Narcotics and Law Enforcement Affairs; and worldwide missions to review all LDPs assigned to their area of responsibility, regardless of the bidding cycle, on a 3-year basis. <sup>17</sup> According to State officials, the 3-year timeframe allows State to strategically plan for, and project, future LDP needs in an effort to minimize the overall number of LDPs that remain vacant or unstaffed. Figure 4 shows the triennial LDP review process.

<sup>&</sup>lt;sup>16</sup> GAO-09-955.

<sup>&</sup>lt;sup>17</sup>According to State officials, an overseas post can also request adjustments to LDPs apart from the Triennial LDP-Review. To do so, a poste-mails the request to its geographic bureau's executive director, including a justification for adding or removing an LDP position. According to an FSO we spoke with at one regional bureau, the regional bureaus do not discourage requests for additional LDPs, but removing an existing LDP requires a strong justification. The executive director of the bureau will then prepare a memo to State's Director General of the Foreign Service and Director of Human Resources requesting a change to a language designation.



Source: GAO analysis of information provided by Department of State officials. | GAO-17-318

Extent to Which Outcomes of State's Triennial Review Address Posts' Reported Language Proficiency Needs Is Unclear

While State's triennial review process is intended to address the language needs of its overseas posts, FSOs we interviewed expressed varying views on the extent to which the outcomes of the process meet posts' reported needs. State's policies indicate that operational need should determine designation of positions as LDPs and required proficiency levels. However, views expressed by geographic bureau officials and FSOs we met with at overseas posts suggest that State officials also consider other factors, such as staffing concerns, when making LDP decisions. In addition, some State officials said that the triennial reviews lack rigor, which may result in posts' maintaining preexisting LDP numbers and levels without having adequately identified the current language needs of each position. Furthermore, in 2013, the State Office of Inspector General (OIG) identified various deficiencies with the triennial review process. <sup>18</sup> For example, the OIG found that State's oversight of

<sup>&</sup>lt;sup>18</sup>Department of State and Broadcasting Board of Governors, Office of Inspector General, *Review of the Process for Establishing Language Designated Positions*, ISP-I-13-24 (Office of Inspections, April 2013).

LDPs is insufficient to identify over- or underdesignation of language requirements.

Post Officials' Views Varied on Whether Designations Resulting from Triennial Reviews Meet Posts' Language Needs

While State's process for designating LDPs is intended to address the language needs of its overseas posts, FSOs we interviewed expressed varying views on the extent to which the designations resulting from the triennial reviews meet their posts' needs. Some post managers we interviewed said that their post or embassy section generally has the appropriate number of LDPs at adequate proficiency levels to meet diplomatic goals. However, some of these officials also said that, while the current proficiency level requirements are adequate, higher proficiency levels would be preferable. For example, consular section managers in countries where a hard or super-hard language is spoken said that while a speaking and reading proficiency of 2/1 or 2/0 is currently required for most of their consular employees, a higher proficiency level, such as a 3/3, would be preferable. State officials in headquarters explained that the language proficiency level set for entrylevel consular positions in hard and super-hard languages is due to department policy with regard to training limitations for entry-level officers. 19 One consular chief said that the section "gets by with what it has," while another said that assistance from LE staff helps to fill the language gap. One post security manager said that the year of language training that security officers generally receive to operate in a country with a super-hard language provides only a "survival" level of proficiency and does not prepare them to function on a professional level.

While State requires a proficiency level of 3/3 in speaking and reading for most Foreign Service generalist LDPs, post managers as well as junior FSOs said that greater proficiency would better equip them to communicate and negotiate with foreign counterparts and advance U.S. diplomatic goals. One public diplomacy manager said that, in an ideal, resource-neutral environment, he would like all of his public affairs officers to have a 4/4 level of proficiency. One political officer with 3/3 proficiency said she struggles to understand some of what is said during meetings and that a higher level of proficiency would be more appropriate for the needs of the job. Post officers said that high proficiency levels, for

<sup>&</sup>lt;sup>19</sup>State headquarters officials noted that the department limits the amount of time entry-level officers may spend in training to ensure they gain sufficient evaluative experience before tenure review. As a result, LDPs for entry-level consular positions in hard and super-hard languages carry a maximum requirement of 2/2 for hard languages or 2/1 or 2/0 for super-hard languages.

example, higher than 3, enable officers to detect nuance and subtle cues in conversations, build greater rapport, have more contacts and access to foreign audiences, participate in more unscripted conversations, and answer questions "off the cuff." FSOs also suggested that certain political, economic, public affairs, and consular officer functions, in particular, could benefit from higher proficiency levels. However, post officials recognized that there are tradeoffs associated with requiring higher levels, including longer training and higher costs.

In addition, post officials indicated that current language designations do not always reflect the needs of their positions or embassy sections. An economic section chief said that while her position is not an LDP, she believes it should be. Some post managers, including two RSOs in LDPs, said that they felt they were able to successfully perform their duties without being language proficient. One post official said that language proficiency was not critical to the execution of his duties because he spends most of his time in the embassy supervising American staff and interacting with English-speaking counterparts and can obtain any needed translation assistance from LE staff. Some post officers recommended reducing the required proficiency levels for certain positions that entail limited interaction with foreign counterparts, such as human resource positions focused on management of U.S. staff.

State Officials Identified Factors besides Language Need That Influence LDP Designations Although State's policies indicate that operational need is the determining criterion for designating a position as an LDP, officials we spoke with cited other factors that may influence LDP designations. According to State's Foreign Affairs Manual (FAM), State should designate positions as requiring language proficiency only when it is essential to enhancing U.S. effectiveness abroad. <sup>20</sup> According to the FAM, factors that posts should consider when assessing their LDP needs include the necessity of using the language to successfully execute the requirements of the position, the importance host-nation interlocutors attach to U.S. diplomats' ability to speak the language, and the English language capabilities of the embassy's LE staff (see app. II for a full list of the FAM criteria). However, geographic bureau officials and post managers told us that they also consider factors such as staffing and cost concerns when designating LDPs and determining proficiency requirements.

<sup>&</sup>lt;sup>20</sup>See 13 FAM 221.2.a.

- **Staffing concerns.** While State's guidance states that the department must identify its language needs irrespective of the number of likely bidders, embassy section heads at the posts we visited said staffing concerns affect their decisions about designating positions as LDPs and requiring certain proficiency levels.<sup>21</sup> For example, embassy managers in countries where super-hard or hard languages, such as Arabic and Russian, are spoken said that certain positions have been designated as not requiring language proficiency or designated at a lower proficiency level to increase the likelihood of filling the positions. Managers also said that, while they would prefer to require higher levels of language proficiency, they sometimes require lower levels to avoid delaying the arrival of FSOs at posts who would otherwise have to spend longer periods in language training. Some State geographic bureau officials spoke of significant tension between guickly filling a vacant position with an officer who lacks language skills versus waiting to fill the position with an officer who is trained and fully proficient. Our interviews with State officials suggest that such staffing concerns particularly affect the EAP, NEA, and SCA bureaus. One geographic bureau official said that the bureau had lowered reading requirements for LDPs at one of its posts because of difficulties in filling the positions. Further, according to a 2014 State memorandum. the Office of Overseas Building Operations does not support LDPs for any of its employees, citing a critical staffing shortage. 22 Moreover, a December 2010 memorandum from State's M/DGHR acknowledged that the designation of LDPs is often influenced by staffing realities and stated that posts usually adjust language levels down on the basis of the likelihood of finding language-qualified bidders.
- Cost concerns. While guidance from State's M/DGHR, including memorandums issued in December 2010 and April 2016, states that the department should assess its language needs in a "resource neutral" environment, geographic bureau and post officials said that the LDP review process is tempered by cost considerations. For example, a management official at a post where a super-hard language is spoken said that the substantial amount of time and money needed to train FSOs in hard and super-hard languages

<sup>&</sup>lt;sup>21</sup>The process of assigning FSOs to their positions typically begins when they receive a list of upcoming vacancies for which they may compete. FSOs then submit a list of positions for which they want to be considered to State M/DGHR.

<sup>&</sup>lt;sup>22</sup>During the 2014 triennial LDP review, State's MDGHR overrode the recommendations of the Office of Overseas Building Operations and designated some of its positions as LDPs.

influences decisions regarding numbers of LDPs and proficiency levels requested. According to a 2013 State OIG report, the State OIG estimates that training students to the 3/3 level in easier world languages such as Spanish can cost \$105,000; training in hard languages such as Russian can cost \$180,000; and training in superhard languages such as Chinese and Arabic can cost up to \$480,000 per student. Students learning super-hard languages to the 3/3 level generally spend 1 year domestically at the FSI and then a second year at an overseas training facility.<sup>23</sup>

Some State Officials
Suggested the Triennial
Review Process Lacks Rigor
and Oversight

While, according to State officials, posts drive the LDP review process because they are best positioned to know their language needs, officials we interviewed—including officials at overseas posts—offered differing perspectives on whether posts' assessment of these needs are sufficiently rigorous. Some post managers said that shifting the review from an annual to a triennial process represented an improvement, because the prior annual reviews were not taken seriously, and the 3-year cycle has allowed State to be more strategic in planning and allocating resources. Some post officials also said that the 3-year cycle is more structured and that the multiple levels of review and input have brought greater stability and consistency to posts' request for LDPs.

However, other officials at posts we visited said that State's language designation process is insufficiently rigorous and systematic, describing it as ad hoc. Some of the geographic bureau and post officials we met with were unaware of State's criteria for establishing LDP designations as outlined in the FAM. Remarks by some officials also suggest that posts tend to base LDP decisions on preexisting LDP numbers and levels. For example, some embassy managers said that they generally review the existing LDP numbers and levels and make minor adjustments. In addition, some geographic bureau officials said that they provide limited substantive review of posts' submissions of LDP numbers and levels.

Further, comments from post officials suggest that posts have generally applied a "blanket" approach in determining LDP proficiency

<sup>&</sup>lt;sup>23</sup>The OIG's estimates were developed based on the FSI weekly tuition rate, the standard number of weeks for 3/3 training, the salary of a midlevel FSO, benefits based on Congressional Budget Office figures, and per diem based on 14 FAM 575.3 and Federal Travel Regulations. Cost estimates for super-hard languages were developed using the above methodology for the domestic portion of training and data provided by Embassy Beijing and NEA and data in State's standard overseas support cost model for the overseas portion of language training.

requirements, despite State guidance that instructs posts to conduct more targeted assessments of their needs. State cables providing posts with guidance for the 2017 and 2014 LDP reviews stated that posts should not automatically assume that a 3/3 proficiency level is required for every LDP in a particular section or embassy and instructed posts to examine the specific language needs for each position. Post managers and staff we interviewed also said that language needs vary by position and portfolio within an embassy section. However, according to State data, most generalist LDPs are designated at a 3/3 level.

In a 2013 report examining State's LDP review process, the State OIG identified deficiencies in State's process for developing language requirements.<sup>24</sup> For example, the report noted that State's oversight of LDPs is insufficient to identify over- or underdesignation of language requirements and that State does not review embassies' and geographic bureaus' language requirements "to facilitate consistent application of language designation criteria and appropriate distribution given U.S. policy priorities." The report indicates that the lack of high-level review has led to anomalies, such as widely varying proficiency requirements for officers performing similar functions at different missions. Specifically, the OIG reported that State designated certain positions as LDPs for some European posts, such as France and Italy, but did not designate similar positions as LDPs in Haiti, Thailand, and Indonesia, where working conditions are more difficult and English language speakers are fewer. In response to an OIG recommendation to address this issue, State's WDGHR provided criteria to the geographic bureaus to use in the 2014 LDP review when determining whether language ability is necessary to advance U.S. foreign policy objectives. In October 2016, State headquarters sent out a cable to all posts, providing them with an updated set of criteria to be used in the 2017 LDP review.

We discussed the concerns expressed by FSOs concerning the LDP process with State's WDGHR. State M/DGHR officials responded that the department has undertaken initiatives to align LDP levels more closely with policy and operational requirements and intends to incorporate these initiatives into its 2017 triennial LDP review process. For example, according to State M/DGHR officials, M/DGHR has encouraged a dialogue between the bureaus and their posts to ensure that their LDP

<sup>&</sup>lt;sup>24</sup>Department of State and Broadcasting Board of Governors, Office of Inspector General, Review of the Process for Establishing Language Designated Positions.

submissions reflect operational requirements and policy priorities and has sent official messages to all posts and bureaus on the process and the need for rigorous review. The officials also noted that State's WDGHR has asked participants to designate their requests for LDPs as high, medium, and low priority, to encourage rigor in considering the real needs of posts and to avoid any implication that all LDPs are of equal importance.

State Is Implementing
Efforts Outlined in
Foreign Language
Strategic Plan but
Has Not Evaluated
Their Effectiveness

State's Foreign Language Strategic Plan Outlines Efforts to Address Language Proficiency Requirements

State's 2011 "Strategic Plan for Foreign Language Capabilities" (foreign language strategic plan), which it issued partly in response to a recommendation in our 2009 report, outlines a number of efforts intended to meet its current and projected needs for foreign language proficiency. The strategic plan sets a goal of increasing the percentage of LDPs filled by fully qualified employees by an annual rate of 3 to 5 percent and estimates that 90 percent of LDPs will be filled by fully qualified employees by 2016 or 2017. The strategic plan presents these efforts in connection with six broad objectives. Some of the listed efforts, such as

<sup>&</sup>lt;sup>25</sup>Our 2009 report concluded that State's approach to addressing its foreign language proficiency requirements did not reflect a comprehensive strategic approach and recommended that the Secretary of State develop a comprehensive strategic plan linking all of State's efforts to meet its foreign language requirements. See GAO-09-955.

 $<sup>^{26}</sup>$ For this purpose, State defines "fully qualified employees" as employees who have tested at or above the designated speaking and reading proficiency levels within the past 5 years.

<sup>&</sup>lt;sup>27</sup>As of September 2016, 69 percent of all overseas LDPs were staffed by officers who met the positions' speaking and reading requirements.

<sup>&</sup>lt;sup>28</sup>State's foreign language strategic plan refers to these objectives as issues.

the Recruitment Language Program (RLP)<sup>29</sup> and the Language Incentive Pay (LIP) program,<sup>30</sup> predate the development of the strategic plan.

As table 5 shows, in addition to outlining the efforts that State planned to implement for each of the six objectives, the foreign language strategic plan also identifies goals and performance measures associated with the objectives.

Table 4: State Department Strategic Plan for Foreign-Language Capabilities—Objectives, Goals, and Performance Measures

### Objective

#### 1) Expand the training complement.

The plan states that the slow progress in improving the rate of positions filled with fully qualified language officers is largely due to growth in total State Department (State) positions and that designation of many new and existing positions as language-designated positions (LDP) has diluted the effect of increased hiring and training. Essentially, rapidly expanding operational needs have reduced the personnel available for training relative to the number of positions for which language is required.

According to the plan, because State's ability to increase its training complement is dependent on the budget process, performance measures for this issue were not included in the plan.

Goals and performance measures

#### 2) Improve State's language designation process.

The plan states that the process for determining which positions should be language designated and at what level of proficiency has traditionally relied on individual post management with little input from Washington bureaus. The lack of bureau-level oversight and consistent, agreed-on criteria has resulted in inconsistency in LDP designation. However, changes to the LDP generally do not occur consistently. Developing a strategy for improving the language-designation process will allow for more predictability of assignment needs and provide more time for planning.

**Goal:** Better define language requirements, establishing standards and updating methodology for designating overseas positions that require language proficiency.

#### Performance measures:

- Criteria for LDP designation developed, approved, shared with all bureaus and posts.
- Triennial review instituted and monitored by geographic functional, and human resources bureaus.

<sup>&</sup>lt;sup>29</sup> Initiated in fiscal year 2004 as the Critical Needs Language Program, and renamed in 2011 as RLP, the program aims to expand the number of candidates entering the Foreign Service with proficiency in languages in which State has current or projected deficits. The RLP rewards candidates who have proficiency in a high-priority foreign language with extra points for higher placement on the Foreign Service register. The program gives .25 points for a one-tour commitment at the entry level and .38 points for a two-tour commitment (one at entry level and one at midlevel).

<sup>&</sup>lt;sup>30</sup>Initiated in fiscal year 2000, the LIP provides monetary incentives for achieving proficiency in designated hard and super-hard "incentive" languages. The list of incentive languages may be revised from time to time to reflect State's changing needs. To be eligible for this incentive pay, an FSO is required to achieve a certain level of language proficiency that ranges from 2/2 to 3/3 in speaking and reading and must be serving at a post where the incentive language is primarily spoken.

#### Objective

#### Develop a modeling tool to help define options for meeting future language needs.

According to the plan, State completed a prototype language training and assignment model (LTAM) to meet future language needs. Currently, the model can estimate the language training complement that will be required for the department to fill all of its current and projected LDPs with language-qualified employees; in the future, the model will enable State to assess more accurately the impact of assignment policies on the ability to fill LDPs with qualified officers as well as estimate the time required to meet specific LDP fill-rate targets.

LTAM is used to help identify languages for

Goal: Develop and implement the capacity to

define options for addressing language trends and

Goals and performance measures

staffing and training needs.

Performance measures:

#### the Recruitment Language Program (RLP) (i.e., languages for which State would gain a marked benefit from hiring employees with preemployment language skills).

LTAM is fully operational and validated.

Results of training surveys are used to adjust training provided to future students.

#### Recruit personnel with foreign language proficiency.

According to the plan, beginning in late 2003, State launched an aggressive effort to recruit Foreign Service applicants who already spoke critically needed, highpriority foreign languages. The plan states that the RLP rewarded candidates who implemented. demonstrated proficiency in these languages.

Goal: Update the RLP and review it every 3 years, subsequent to the triennial LDP review.

Performance measure: Updated RLP is

#### Make incentives more effective, and maximize the impact of language and assignment polices.

According to the plan, State has various mechanisms, requirements, and incentives in place to ensure that it has a strong contingent of foreign-language speakers. The plan states that the department recruits for qualified speakers of certain priority languages. The Foreign Service Act of 1980 requires that Foreign Service generalists gain proficiency in a foreign language to receive tenure and remain in the Foreign Service. Members of the Foreign Service must have a 3/3 score in at least one language to become a member of the Senior Foreign Service. Provide financial incentives through the LIP program and the pilot Asymmetric LIP program, which allows the speaking and reading requirements to be set at different levels; and provide further encouragements to learn, maintain, use, and reuse a foreign language in multiple assignments.

Goals: Focus incentives to increase the absolute number of foreign-policy priority language speakers; concentrate Language Incentive Pay (LIP) resources on languages of most importance to foreign-policy goals; and find additional ways to increase repeated use of language skills. Ensure that language and assignment policies maximize the number of LDPs filled with qualified staff.

#### Performance measures:

- Increase in the number of people who speak currently designated priority languages.
- Evaluation of the Asymmetric LIP pilot
- Review of the LIP program and establishment of criteria for LIP languages and a mechanism for LIP review.
- Increase in rate of filling LDPs with languagequalified employees

#### Objective

#### 6) Strengthen and develop new approaches for language training.

The plan stipulates that "State must provide world-class, highly effective training to our employees to support them in acquiring and maintaining foreign language proficiency... State must continue to develop and update distance learning products, and as resources are available, purchase or develop tools that can be used on a variety of home computers or even mobile devices to support our employees whenever and wherever they are able to study."

#### Goals and performance measures

**Goal:** Adapt Foreign Service Institute (FSI) language training to changing student populations, technology, adult learning, and venues.

#### Performance measures:

- Percentage of students who reach their LDP in the standard training time. FSI's School of Language Studies will periodically examine completion statistics to understand when changing a language's standard training length may be necessary due to the changing needs of a shifting population of students.
- Number of students participating in part-time distance learning, early morning, and post language programs, resources permitting.
- In addition to FSI's Annual Impact Survey and Annual Leadership Impact Survey results, develop other evaluation tools to provide information on effectiveness of training.

Source: Department of State, "Strategic Plan for Foreign-Language Capabilities" (Washington, D.C.: 2011) | GAO-17-318

State Has Taken Steps to Implement Most Efforts Identified in the Foreign Language Strategic Plan

According to information that State provided, State has taken steps to implement efforts addressing most of the six broad objectives identified in the foreign language strategic plan but has made limited progress in addressing others. According to information provided by State's M/DGHR, as of October 2016, budgetary and operational pressures had precluded an expansion of the training complement (objective 1), and the prototype language training and assignment model described in the strategic plan remains under development (objective 3). However, State is implementing the following efforts to address the other four objectives:

- LDP reviews (objective 2). To improve the department's language designation process, as discussed earlier, in 2010 State changed the frequency of the LDP review process from annual to triennial and has initiated its third triennial LDP review process, which it expects to complete in 2017.
- RLP (objective 4). Initiated in fiscal year 2004, the RLP aims to
  expand the number of candidates entering the Foreign Service with
  proficiency in languages in which State has current or projected
  deficits. To enhance the RLP, according to a State document, State
  has updated the list of recruitment languages to reflect those that are
  of critical importance to U.S. foreign policy, those in which posts are
  experiencing severe shortages or staffing gaps, and those that
  present specific recruiting and training challenges. According to State

data, the percentage of entry-level officers hired through the RLP has varied from a peak of 40 percent (221 of 547 officers) in fiscal year 2011 to 5 percent (16 of 353 officers) in fiscal year 2016.

- LIP program (objective 5). To make language incentives more effective and maximize the impact of language and assignment policies, according to State's M/DGHR, State reviewed the LIP in 2012, the first such review in over a decade, to clarify and streamline the program by aligning the designated languages (i.e., those eligible for incentives) with the department's current needs and incentivizing employees to use and maintain proficiency in those languages. As a result of the review, State reduced the number of incentive languages from 52 to 34 to reflect the department's highest strategic priorities. Also, according to information provided by State's M/DGHR, FSI adjusts course offerings in priority languages, including some that are included in the LIP program, as needed, to address the department's strategic planning and performance goals. According to State data, between 2010 and 2016 a total of 11,477 FSOs received LIP, amounting to \$77.6 million.
- Foreign language proficiency requirement (objective 5). One of the mechanisms State uses to ensure a strong contingent of foreign language speakers is the inclusion of sustained professional language proficiency in the promotion precepts for Foreign Service generalists. According to FSOs and other officials we spoke with, this policy may be creating an incentive for FSOs to learn "world" languages, such as Spanish, which generally take 6 months to reach a 3/3, instead of super-hard languages, which take 2 years to reach the same level of proficiency. According to a 2013 State OIG report, promotion and tenure policies tied to language skills influence the number and level of LDP designations. An official from the OIG who worked on the 2013 report explained that the promotion policy may also contribute to the discrepancy in the numbers of LDPs with proficiency in world and super-hard languages as well as shortfalls in language-proficient FSOs to fill LDPs in certain priority languages. 31 Some FSOs told us that taking 2 years to learn a super-hard language makes them less competitive for promotion, expressing a perception that State's promotion system undervalues language training. 32 However, State's MDGHR said that overall, the promotion system does not

<sup>&</sup>lt;sup>31</sup>Department of State and Broadcasting Board of Governors, Office of Inspector General, Review of the Process for Establishing Language Designated Positions.

<sup>&</sup>lt;sup>32</sup>We reported similar views expressed by FSOs in 2009. See GAO-09-955.

disadvantage FSOs who study hard or super-hard languages because time spent in language training extends their years of promotion eligibility. We discussed this issue with State's MDGHR and inquired whether a review of this policy had been conducted to determine its potential impact on learning super-hard languages. In response, State informed us that the language proficiency requirement for promotion, along with other related policies, is currently under review.

Language-related technology (objective 6). We found that State's FSI has implemented various language-related technologies to improve the language acquisition process, such as the Smart Notebook, which offers language instruction via the Internet, as well as language learning applications and technology-enabled classrooms with screen-sharing applications. FSI staff said that technology has improved the language acquisition process by allowing students to engage in lifelike scenarios in the classroom while learning a language, giving students access to lessons that were previously available only in language labs, and accommodating students' schedules and needs. In addition, State officials told us that they are using technology to complement language skills at the operational level. For example, the embassy in China identified 48 positions for which it could adjust the speaking and reading level from a 3/3 to a 3+/2, in part because the "advent [in recent years] of sophisticated translation technologies enables officers to access information from written materials in multiple ways and on a scale never before possible." A senior FSO in Mexico indicated that both reading and speaking are important but that the reading requirement could possibly be lowered, since translation technology can be used to assist with reading. FSOs in countries we visited generally indicated that they use online translation tools to translate documents. However, some FSOs reported that they could not rely exclusively on the translation provided by the online tool because it is generally not entirely accurate. Some said they use it as an initial step in translating documents, while others said they use it to translate documents only for their own use or when they need an immediate translation.

State Has Not Evaluated
Effects of Efforts
Implemented under the
Foreign Language
Strategic Plan

More than 5 years after State developed and began implementing its foreign language strategic plan, we found no evidence that State had conducted a systematic and comprehensive evaluation of all the actions identified in the plan to determine their effects on language proficiency gaps. According to State's evaluation policy, the department is committed to using performance management best practices, including evaluation, to achieve the most effective U.S. foreign policy outcomes and greater accountability. State's evaluation policy defines evaluation as the

systematic collection and analysis of information about the characteristics and outcomes of programs, management processes, and delivery systems as a basis for judgments, to improve effectiveness and inform decision makers about current and future activities. 33 Also, according to federal internal control standards, internal controls should provide reasonable assurance that the objectives of an agency are being achieved to ensure the effectiveness and efficiency of operations, including the use of the agency's resources.34 We asked State's M/DGHR office whether it had conducted any evaluations of the effects of these efforts, including the RLP and the LIP program, on language proficiency. M/DGHR officials responded that they were unaware of any such evaluations but noted that the relatively small number of personnel involved in the programs made it difficult to conduct quantitative assessments. However, State officials indicated that after completion of the ongoing triennial LDP review, the Language Policy Working Group would review both RLP and LIP, but they did not provide details on the nature of the planned review.

State reports annually to Congress on the levels of foreign language proficiency at overseas posts. In addition, State provides updates on foreign language proficiency gaps and efforts to address them in its annually updated Five Year Workforce Leadership and Succession Plan. The workforce plan for fiscal years 2016 through 2020 includes updates on the number of LDPs staffed worldwide; challenges in filling LDPs; and efforts outlined in, or implemented in response to, the foreign language strategic plan. For example, the workforce plan highlights the use of recruitment incentive languages to provide extra points on the hiring register of FSO candidates who speak and read proficiently in these languages and pass the assessment process, which increases their chance of entering the Foreign Service. However, our examination of these documents found no evidence that State has conducted a systematic and comprehensive evaluation of efforts to address each of the objectives in the strategic plan. Without systematic and comprehensive evaluations, consistent with State evaluation policy and federal internal control standards, State is unable to determine the effects of the efforts outlined in the strategic plan in addressing language

<sup>&</sup>lt;sup>33</sup>State, Department of State Evaluation Policy, http://www.state.gov/s/d/rm/rls/evaluation/2015/236970.htm (Washington, D.C.: Jan. 29, 2015).

<sup>&</sup>lt;sup>34</sup>See GAO-14-704G.

proficiency shortfalls, particularly in hard and super-hard languages, and to take corrective actions.

### Conclusions

Since 2008, State has increased its levels of foreign language proficiency at overseas posts, strengthening its overall capacity to advance U.S. foreign policy and economic interests worldwide. Nonetheless, significant proficiency gaps in priority languages such as Arabic and Chinese may adversely affect State's ability to fulfill its diplomatic responsibilities in regions of critical importance to U.S. foreign policy. Although State has implemented efforts to enhance foreign language proficiency, as outlined in its 2011 "Strategic Plan for Foreign-Language Capabilities," it has not conducted a systematic and comprehensive evaluation of these efforts' effectiveness. As a result, State cannot determine the extent to which these efforts have contributed to progress in increasing language proficiency worldwide and has limited information on which to base future investments of its resources. Accordingly, State cannot determine whether adjustments to the plan are needed to enhance State's capacity to address increasingly complex economic and national security challenges overseas.

# Recommendation for Executive Action

To strengthen State's ability to address persistent gaps in foreign language proficiency at overseas posts and make informed future resource investments, we recommend that the Secretary of State evaluate the effectiveness of efforts implemented under the "Strategic Plan for Foreign-Language Capabilities."

## **Agency Comments**

We provided a draft of this report for review and comment to State. We received written comments from State, which are reprinted in appendix III. State agreed with our recommendation and indicated that "the Department will develop a process to evaluate implementation of the 2011 Strategic Plan and future plans. The Department will report on results of the evaluation within one year." State also provided technical comments, which we have incorporated throughout the report, as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of State, and other interested parties. In addition, the report is available at no charge on the GAO website at <a href="http://www.gao.gov">http://www.gao.gov</a>.

If you or your staff have questions about this report, please contact me at (202) 512-8980, or CourtsM@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

Michael J. Courts

Director, International Affairs and Trade

# Appendix I: Objectives, Scope, and Methodology

In this report, we examine (1) the extent to which the Department of State (State) is meeting its foreign language proficiency requirements for overseas posts as well as the effects of language proficiency and any gaps in State's ability to perform diplomatic duties, (2) State's process for identifying overseas posts' language proficiency needs and the extent to which the process addresses these reported needs, and (3) efforts State has taken to enhance foreign language proficiency and any effects of those efforts.

To address these objectives, we analyzed data and reviewed documents provided by State, including relevant provisions of the Foreign Affairs Manual. We interviewed officers from State's Bureaus of African Affairs, Consular Affairs, European and Eurasian Affairs, East Asian and Pacific Affairs, Near Eastern Affairs, South and Central Asian Affairs, Western Hemisphere Affairs, and Human Resources in Washington, D.C., as well as officials from the Foreign Service Institute in Arlington, Virginia. In addition, we interviewed officials at the U.S. embassies in Beijing, China; Cairo, Egypt; Seoul, South Korea; Mexico City, Mexico; and Moscow, Russia. We selected these countries to examine language issues related to Mandarin Chinese, Arabic, Korean, Spanish, and Russian. Our criteria for selecting these countries included (1) countries in which priority languages, as identified by State, are spoken;1 (2) the number of language-designated positions (LDP) in selected countries, including countries with a relatively low and high number of LDPs; (3) gaps in filling LDPs; (4) the difficulty of the languages spoken in selected countries; and (5) the diplomatic and economic significance of selected countries to the United States. While overseas, we met with embassy officials, including senior and junior-level Foreign Service officers within the embassies' consular, economic, political, public affairs, security, and management sections.

To examine the extent to which State is meeting its foreign language requirements, we obtained data from State's Global Employee Management System database on all overseas LDPs and the language

<sup>&</sup>lt;sup>1</sup>For the purposes of this review, State defines "priority" languages as languages that are of critical importance to U.S. foreign policy, are experiencing severe shortages or staffing gaps, or present specific challenges in recruiting and training. State's department-wide, current list of priority languages includes Arabic, Mandarin Chinese, Dari, Hindi, Pashto, Farsi, Korean, and Urdu. In addition to these priority languages, State's Bureau of Consular Affairs has its own bureau-specific prioritylanguages that are based on its number of language-designated consular positions. The bureau has six priority languages, including Spanish, Mandarin Chinese, Arabic, French, Russian, and Portuguese.

skills of the incumbents filling the positions as of September 30, 2016. We compared the incumbents' reading and speaking scores with the reading and speaking levels required for the positions and determined that an incumbent met the requirements for the position only if his or her scores equaled or exceeded both the speaking and reading requirements. A limited number of positions are designated in two languages. We determined that the officer met the requirements of such positions if he or she met both the speaking and reading requirements for at least one of the designated languages. We also interviewed State officials responsible for compiling and maintaining these data and determined the data to be sufficiently reliable for identifying the number of LDPs filled by officers who met the requirements of the position. To assess the effects of language proficiency and any gaps in State's ability to perform its diplomatic duties, we reviewed previous GAO reports as well as the December 2012 Accountability Review Board report on the attacks on the mission in Benghazi, Libya. We interviewed State officials in Washington, D.C., and at the overseas posts we visited. We also met with former senior State officials, including ambassadors and a former Director General of the Foreign Service and Director of Human Resources, to gain their insights on the consequences of language shortfalls at overseas missions. In addition, we conducted a literature review on the effects of language proficiency and any gaps in State's ability to perform its diplomatic duties.

To examine State's process for identifying overseas posts' language proficiency requirements and the extent to which the process addresses these reported needs, we reviewed previous GAO reports and State documents, such as memorandums and cables on the language-designation process. We also reviewed State's Office of Inspector General's (OIG) 2013 review of State's process for establishing LDPs and interviewed State OIG officials. In addition, we interviewed State officials in Washington, D.C., and at overseas posts.

To examine efforts State has taken to enhance foreign language proficiency and any effects of those actions, we reviewed State planning documents, including the State Department's "Strategic Plan for Foreign Language Capabilities," dated March 7, 2011, as well as the 2015 and 2016 versions of its *Five Year Workforce and Leadership Succession* 

<sup>&</sup>lt;sup>2</sup>Department of State and Broadcasting Board of Governors, Office of Inspector General, Review of the Process for Establishing Language Designated Positions, ISP-I-13-24 (Arlington, VA: Office of Inspections, April 2013).

Appendix I: Objectives, Scope, and Methodology

*Plan.* We obtained information from State on steps it has taken to address key issues in the 2011 strategic plan. We compared steps State has taken to the objectives described in the "Strategic Plan for Foreign-Language Capabilities" and assessed whether they have been evaluated in accordance with State's Evaluation Policy and federal internal control standards.<sup>3</sup> We also reviewed State's *Report on Foreign Language Proficiency for Fiscal Year 2015* and its promotion policies. In addition, we interviewed State officials in Washington, D.C., and at overseas posts.

We conducted this performance audit from February 2016 to March 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

<sup>&</sup>lt;sup>3</sup>GAO, Standards for Internal Control in the Federal Government, GAO-14-704G (Washington, D.C.: September 2014).

# Appendix II: Department of State Criteria for 2017 Language-Designated Position Review

According to the Department of State's (State) Foreign Affairs Manual (FAM 221.2), operational need is the determining criterion for language-designated positions (LDP), where language proficiency is essential, rather than merely helpful or convenient, to enhancing U.S. effectiveness abroad. The FAM also outlines the following criteria for consideration by responsible offices in designating LDPs:

- the necessity of using the language to execute successfully the requirements of the position;
  - the frequency of daily use of the language;
  - the fluency level of that engagement;
- the official designation of the language as the national language(s);
- the importance host-nation interlocutors attach to our speaking their language;
- the prevalence of another language a significant segment of the population speaks;
- the general level of English language penetration;
- the English language capabilities of the embassy's locally employed staff in the relevant section;
- the professionalism and availability of interpretation/translation services;
- the prevalence of corruption and the need for language proficiency to ensure necessary oversight;
- the importance of being able to speak certain language(s) in public or at representational events;
- the availability of media in the language(s); the importance of monitoring social media in the local language;
- the level of literacy in the country; the prevalence of documents published in the language;
- whether speaking or reading the language, or both, would notably increase the efficiency and scope of the employee's tasks or work portfolio;
- the variety of interactions required for the job (speeches, formal demarches, receptions, visa interviews, travel and engagement with population in rural communities, key segments of society, or minority groups);

### Appendix II: Department of State Criteria for 2017 Language-Designated Position Review

- the importance of building a cadre of speakers of the language within the Foreign Service: Does the department need to develop employees for future assignment at higher levels of responsibility with these language skills? and
- the necessity for employees who occupy positions in sections (for example, security or management) where the need for foreign language skills is so innate to the job (e.g., the work involves regular contact with foreign nationals in the local native language) that the post needs at least one or more LDP per section.

According to an October 2016 State cable, an additional primary criterion, beyond the criteria referenced in 13 FAM 221.2, is the importance of understanding the language to manage one's personal security. The State cable also notes other factors that should be considered in the LDP review process, including the following:

- In identifying LDPs, bureaus are encouraged to keep in mind that
  designations may vary from the usual S [speaking]-3/R[reading]-3
  level, including asymmetric designations in which a mandated
  speaking proficiency may be higher than the reading proficiency (e.g.,
  S-3/R-2, S-2/R-1, or even S-2/R-0).
- Bureaus should consider an asymmetric language designation and how it might affect employee productivity, personal security, and overall resource management.
- Bureau requests for modifications to the career development plan and language incentive pay are under consideration. Missions are encouraged to set LDP levels for speaking and reading based on the level of language proficiency skills needed to do the work.
- If job requirements call for either of two languages, bureaus should consider dual designations, with the preferred language listed first.
- If language proficiency is preferred but not essential, the position should be marked with speaking and reading requirements of 0/0 to designate it as a language-preferred position. This designation will help identify future resource needs and indicate when first- and second-tour language training could be beneficial.

# Appendix III: Comments from the Department of State



**United States Department of State** 

Comptroller
Washington, DC 20520

FEB 2 7 2017

Charles M. Johnson, Jr.
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Johnson:

We appreciate the opportunity to review your draft report, "DEPARTMENT OF STATE: Foreign Language Proficiency Has Improved, but Efforts to Reduce Gaps Need Evaluation" GAO Job Code 100617.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Jeremy Curtin, Senior Adviser, Bureau of Human Resources at (202) 736-7005.

Sincerely,

Christopher H. Flaggs

Enclosure:

As stated

cc: GAO – Michael J. Courts DGHR– Jo Ellen Powell State/OIG - Norman Brown Appendix III: Comments from the Department of State

#### State Department Response to GAO Report

## <u>DEPARTMENT OF STATE: Foreign Language Proficiency Has Improved,</u> <u>but Efforts to Reduce Gaps Need Evaluation</u> (GAO-17-318, GAO Code 100617

The Department of State appreciates the opportunity to comment on the draft report "Department of State Foreign Language Proficiency Has Improved, but Efforts to Reduce Gaps Need Evaluation."

**Recommendation:** "To strengthen State's ability to address persistent gaps in foreign language proficiency at foreign posts and make informed future resource investments, we recommend that the Secretary of State evaluate the effectiveness of efforts implemented under the 'Strategic Plan for Foreign Language Capabilities.'"

**Response:** The Department concurs with this recommendation. The Department will develop a process to evaluate implementation of the 2011 Strategic Plan and future plans. The Department will report on results of the evaluation within one year.

# Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact	Michael J. Courts, (202) 512-8980 or courtsm@gao.gov
Staff Acknowledgments	In addition to the contact named above, Godwin Agbara (Assistant Director), Francisco M. Enriquez (Analyst-in-Charge), Juan Pablo Avila-Tournut, Mark Dowling, Justin Fisher, Emily Gupta, and Reid Lowe made key contributions to this report.

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Public Affairs	Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548
Strategic Planning and External Liaison	James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707 U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548

