



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

AUG 29 2014
Ref: 12-00025-F

OCCL

Mr. Steven Aftergood
Federation of American Scientists
1725 DeSales St NW #600
Washington, DC 20036


Dear Mr. Aftergood:

This is in response to your Freedom of Information Act (FOIA) request dated October 7, 2011, for "*D-2011-112 Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective, September 30, 2011 (Project No. D2010-D000JA-0165.001)*." We received your request on October 11, 2011, and assigned it case number 12-00025-F.

The enclosed report is responsive to your request. I determined that portions of the report are exempt from release pursuant to 5 U.S.C. § 552(b)(6), which pertains to information, the release of which would constitute a clearly unwarranted invasion of personal privacy. Major General Michael X. Garrett, U.S. Central Command, also determined that additional information is exempt from release pursuant to 5 U.S.C. § 552(b)(6). Major General Stephen G. Fogarty, Commanding, U.S. Army Intelligence and Security Command, determined that the remaining redacted portions are exempt from release pursuant to 5 U.S.C. § 552(b)(5), which pertains to certain inter- and intra-agency communications protected by the deliberative process privilege; and 5 U.S.C. § 552(b)(7)(E), which pertains to records or information compiled for law enforcement purposes, the release of which could reasonably be expected to disclose investigative techniques and procedures.

If you are not satisfied with this action, you may submit an administrative appeal to the Department of Defense, Office of Inspector General, Office of Communications and Congressional Liaison, ATTN: FOIA Appellate Authority, Suite 17F18, 4800 Mark Center Drive, Alexandria, VA 22350-1500. Your appeal should be postmarked within 30 days from the date of this letter, should cite case number 12-00025-F, and should be clearly marked "Freedom of Information Act Appeal."

Sincerely,


Jeanne Miller
Chief, Freedom of Information and
Privacy Office

Enclosure(s):
As stated

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Report No. D-2011-112

September 30, 2011

Inspector General

United States
Department of Defense



Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective

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Acronyms and Abbreviations (U)

CAT	Category
CCF	Central Clearance Facility
CI	Counterintelligence
CLPSO	Contract Linguist Program Support Office
DISCO	Defense Industrial Security Clearance Office
INSCOM	U.S. Army Intelligence and Security Command
LSO	Linguist Support Office
MEP	Mission Essential Personnel
MSD	Meade Screening Detachment
PDPC	Pre-Deployment Processing Center

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DEPARTMENT OF DEFENSE
400 ARMY NAVY DRIVE
ARLINGTON, VIRGINIA 22202-4704

September 30, 2011

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

SUBJECT: Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective (Report No. D-2011-112) (U)

(U) We are providing this report for your review and comment. We determined that U.S. Army Intelligence and Security Command and the contractor effectively implemented security provisions such as contractor prescreening and an interim security clearance or a fitness determination in contract no. W911W4-07-D-0010. However, the effectiveness of the counterintelligence interviews, conducted by Meade Screening Detachment personnel, could be improved if Meade Screening Detachment personnel would receive a counterintelligence interview roster and completed background checks on potential contract linguists in a timely manner. Receiving timely information on each contract linguist would enable the Meade Screening Detachment to review linguists' background information before the interview.

(U) DoD Directive 7650.3 requires that all recommendations be resolved promptly. We considered management comments on the draft of this report when preparing the final report. Based on management comments, we revised draft Recommendation 1. The Army Deputy Chief of Staff for Intelligence, G-2, comments for Recommendation 1 were only partially responsive and the comments for Recommendation 2 were not responsive. Therefore, we request additional comments by October 21, 2011.

(U) Please provide comments that conform to the requirements of DoD Directive 7650.3. If possible, send a .pdf file containing your comments. Copies of your comments must have the actual signature of the authorizing official for your organization. We are unable to accept the /Signed/ symbol in place of the actual signature. If you arrange to send classified comments electronically, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

(U) We appreciate the courtesies extended to the staff. Please direct questions to (b)(6) at (703) 604-(b)(6) (DSN 664-(b)(6))

Daniel R. Blair
Deputy Inspector General
for Auditing

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Results in Brief: Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective (U)

What We Did (U)

(U) This is one in a series of audits conducted in response to a January 2010 shooting incident in Afghanistan involving a contract linguist and U.S. forces. We determined whether the security provisions in the U.S. Army Intelligence and Security Command contract for linguist support in Afghanistan (W911W4-07-D-0010) were implemented effectively. This audit examined security provisions for U.S.-hired contract linguists.

What We Found (U)

(U) Overall, U.S. Army Intelligence and Security Command and the contractor effectively implemented security provisions, such as contractor prescreening and an interim security clearance or a fitness determination in contract no. W911W4-07-D-0010.

(U) However, the effectiveness of one stage in the screening process, the counterintelligence interview conducted by the Meade Screening Detachment (MSD), could be improved. The Contract Linguist Program Support Office¹ is required to submit to the MSD a tentative counterintelligence-focused security review and security interview roster, identifying linguists by name and requested interview date, 28 days before the proposed interview. However, MSD personnel received this roster no more than 9 days before the interview. In addition, given the compressed time frame for screening linguists,

in a non-statistical sample we found that 56 of the 64 contract linguists' background checks were incomplete before their counterintelligence interviews.

(U) As a result, MSD personnel's ability to conduct a thorough interview was limited, potentially rendering the interview less effective and thereby increasing the risk of hiring contract linguists who could pose threats to the safety and security of U.S. forces or missions.

What We Recommend (U)

(U) We recommend the Army Deputy Chief of Staff for Intelligence, G-2, in coordination with the Commanding General, U.S. Army Intelligence and Security Command, initiate action to examine and revise policy, as appropriate, for the requirement to submit a counterintelligence-focused security review and interview roster in advance of any proposed counterintelligence interview. Additionally, we recommend performing an analysis to determine the risk of having incomplete contract linguist background checks at the time of the counterintelligence interview, and adjust policy based on the risk analysis.

Management Comments and Our Response (U)

(U) The comments from the Army Deputy Chief of Staff for Intelligence, G-2, on Recommendation 1 were partially responsive and the comments on Recommendation 2 were not responsive. We request that you provide additional comments by October 21, 2011. Please see the recommendations table on the back of this page.

¹ (U) MSD and the Contract Linguist Program Support Office are subordinate units of the U.S. Army Intelligence and Security Command. The MSD is located at Fort Meade, Maryland. The Contract Linguist Program Support Office is located at Fort Belvoir, Virginia.

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Report No. D-2011-112 (Project No. D2010-D000JA-0165.001)

September 30, 2011

Recommendations Table (U)

Management	Recommendations Requiring Comment	No Additional Comments Required
Army Deputy Chief of Staff for Intelligence, G-2	1,2	

(U) Please provide comments by October 21, 2011

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Introduction (U)

Objective (U)

(U) Our objective was to determine whether the security provisions of a U.S. Army Intelligence and Security Command (INSCOM) contract for linguist support in Afghanistan (W911W4-07-D-0010) were implemented effectively. See Appendix A for a discussion of our scope and methodology and prior audit coverage related to the audit objective.

Background (U)

(U) This audit is one in a series of audits conducted in response to a January 2010 shooting incident in Afghanistan involving a contract linguist and U.S. forces. This audit focuses on whether security provisions in INSCOM contract no. W911W4-07-D-0010 were effectively implemented for U.S.-hired contract linguists² in Afghanistan. DoD Office of Inspector General Report No. D-2010-079, "Security Provisions in a U.S. Army Intelligence and Security Command Contract for Linguist Support," August 13, 2010, focused on whether appropriate security provisions were included in contract no. W911W4-07-D-0010. A future audit will focus on whether security provisions in the same contract were effectively implemented for locally hired contract linguists in Afghanistan.

Contract No. W911W4-07-D-0010 (U)

(U) On September 7, 2007, INSCOM awarded contract no. W911W4-07-D-0010 to Mission Essential Personnel (MEP), LLC, for linguist support. The contract is an indefinite-delivery, indefinite-quantity, cost-plus-award-fee contract with a 5-year performance period and an initial cost ceiling of \$703 million. On March 12, 2010, INSCOM modified the contract to increase the cost ceiling to \$781.5 million. On May 7, 2010, INSCOM again modified the contract to increase the cost ceiling by \$679 million to a new cost ceiling of \$1.46 billion. Under the contract terms, MEP is to provide skilled interpreters and translators to support intelligence operations related to Operation Enduring Freedom-Afghanistan. The interpreters and translators enable U.S. forces to communicate with the local Afghan populace, gather information for force protection, and interact with other foreign military units.

(U) The contract performance work statement requires contractors to pre-screen contract linguists. The pre-screening process includes reviews of the contract linguist's general translation and interpretation skills, category-specific skills, medical health, and an initial security review to include completion of a Standard Form 85P/86. Contractors are required to fully document the pre-screening results and make them available to the Government upon request. The contractors are reimbursed only for pre-screening linguists who ultimately pass the U.S. Government's security review or for linguists who

² (U) For the purpose of this report, the term "contract linguist" is used to describe a linguist applicant in any stage of the security screening process.

(U) fail the security interview but for whom contractors can provide documentation that a pre-screening occurred.

Contract Linguist Categories (U)

~~(FOUO)~~ Contract linguists are categorized based on their required level of access to classified information needed to fulfill their prospective duties:

- ~~(FOUO)~~ Category (CAT) I linguists can be either U.S. citizens or non-U.S. citizens and do not require a security clearance.
- ~~(FOUO)~~ CAT II linguists must be U.S. citizens and are required to acquire and hold a Secret security clearance.
- ~~(FOUO)~~ CAT III linguists must be U.S. citizens and are required to acquire and hold a Top Secret security clearance with access to Sensitive Compartmented Information.

Organizational Structure (U)

~~(FOUO)~~ DoD designated the Secretary of the Army as Executive Agent for contract foreign language support in DoD Directive 5160.41E, "Defense Language Program," October 21, 2005. The Secretary of the Army, in a memorandum titled "Delegation of Authority for DoD Executive Agent for Contract Linguists," March 1, 2006, delegated that responsibility to the Army Deputy Chief of Staff for Intelligence, G-2 (Army G-2). Additionally, Army G-2 is responsible for issuing policy and providing oversight of contract linguists. Army G-2 established and maintains the Linguist Support Office (LSO), which provides day-to-day management of the contract linguist personnel security and counterintelligence (CI)-focused security review program and completes a fitness determination on all CAT I linguists.

~~(FOUO)~~ INSCOM is an Army major command that conducts intelligence, security, and information operations. INSCOM established and maintains the Contract Linguist Program Support Office (CLPSO), which served as the contracting officer's representative for the subject contract. The Meade Screening Detachment (MSD), a subordinate unit of INSCOM, conducts CI screening of contract linguists. MSD is also known as the 902nd Military Intelligence Group.

~~(FOUO)~~ The Army Central Clearance Facility (CCF), also a subordinate unit of INSCOM, is responsible for adjudicating Secret and Top Secret security clearances with Sensitive Compartmented Information. Before November 30, 2010, the Defense Industrial Security Clearance Office (DISCO), part of the Defense Security Service, was responsible for the adjudication of Secret security clearances for CAT II linguists.

Army Policy for Contract Linguists (U)

~~(FOUO)~~ The contract statement of work references Army policy to address the inherent security risks associated with contractor personnel who provide foreign language translation and interpretation services. The policy applies to all Army activities that use INSCOM contracts to acquire foreign language translation and interpretation services.

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~~(FOUO)~~ Army policy memorandum, "Contract Linguist Counterintelligence and Security Screening Policy," May 15, 2008, (2008 memorandum) established the CI and security screening standards for contract linguists supporting Department of Army missions. The Army revised the 2008 memorandum twice. The first revision reduced the number of identification forms the contract linguist needed to provide from five to two, with at least one establishing citizenship. The second revision expedited the screening process by allowing the CI interview³ to take place concurrently with the processing of National Intelligence Agency Checks.⁴

~~(FOUO)~~ In 2010, the Army issued, "Contract Linguist Personnel Security Investigation and Counterintelligence-Focused Security Review Program Policy," September 20, 2010 (2010 memorandum), a comprehensive revision to the 2008 memorandum. The 2010 memorandum required CLPSO to submit a tentative CI-focused security review and security interview roster to the MSD and the LSO 28 days in advance of any proposed linguist interview that identifies linguists by name and the requested interview date.

Review of Internal Controls (U)

(U) DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provide reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses associated with the CI interview for U.S.-hired linguists. We will provide a copy of the report to the senior official responsible for internal controls for the Army Deputy Chief of Staff for Intelligence, G-2.

³ ~~(FOUO)~~ The CI interview is conducted by a trained screener who uses a questionnaire covering topics such as motivations, allegiance to the United States, and security concerns. Based on the results of the interview, the screener determines whether the linguist constitutes a threat to the safety and security of U.S. personnel or missions.

⁴ ~~(FOUO)~~ The National Intelligence Agency Checks are background checks from agencies such as the Federal Bureau of Investigation, Central Intelligence Agency, National Security Agency, and others.

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Finding. Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be More Effective (U)

(U) Overall, security provisions in contract no. W911W4-07-D-0010 for linguist support in Afghanistan were implemented effectively for contract linguists hired in the United States. Specifically, MEP, CLPSO, MSD, LSO, CCF, and DISCO personnel implemented required security provisions such as contractor prescreening, background checks, CI interviews, and interim security clearances or fitness determinations. However, the effectiveness of one of those steps, the CI interview, was limited because MSD personnel had limited advance notice of interview dates, and background checks had not always been completed by the time of the interviews. This occurred because the security screening process requires multiple organizations to evaluate contract linguists at the same time, as well as to make appropriate risk assessments, all within a short time frame. CLPSO did not meet a 28-day requirement to submit a tentative CI-focused security review and security interview roster that identifies contract linguists by name because of the compressed timeframe to screen contract linguists. Additionally, background checks were not always completed before the interview because, to expedite the processing of contract linguists, the U.S. Army issued an update to the 2008 memorandum allowing for the processing of background checks to occur concurrently with the CI interview. As a result, MSD personnel had limited time to prepare for CI interviews and had incomplete background information on contract linguists, thus increasing the risk of hiring linguists who could potentially constitute threats to the safety and security of U.S. military personnel or missions.

Security Screening Process for U.S.-Hired Contract Linguists (U)

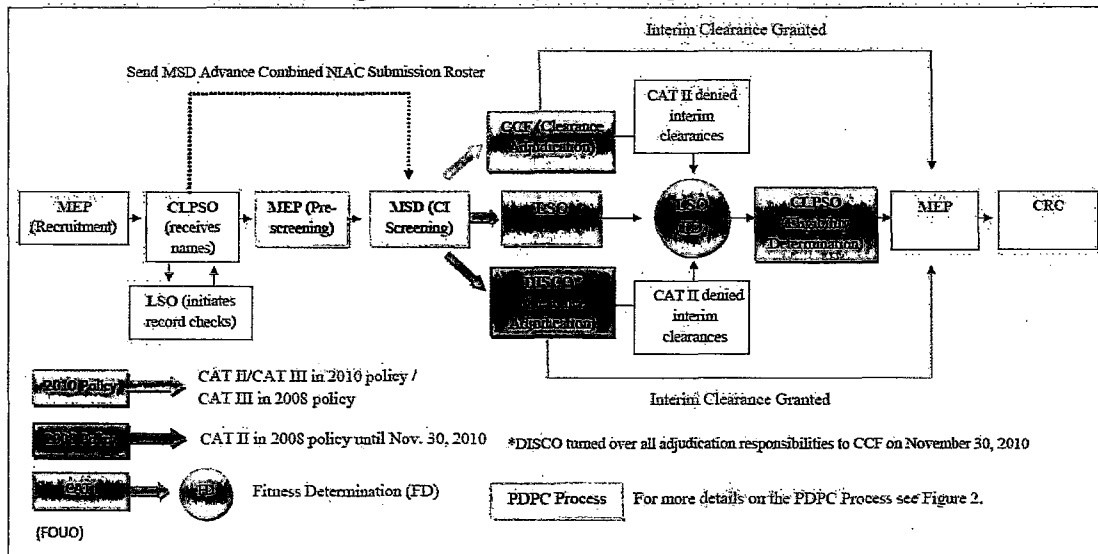
(FOUO) NSCCM - (S/E), (D/F), (E)



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(U) Figure 1 outlines the security screening process for contract linguists (see Appendix B for a detailed explanation of the process). Regardless of clearance category, contract linguists are subject to contractor prescreening, government and intelligence database checks, and a CI interview. CAT II and CAT III contract linguists are then evaluated by DISCO or CCF personnel for an interim security clearance.⁵ If a contract linguist is granted an interim clearance, MEP automatically receives notification in the Joint Personnel Adjudication System. In contrast, for CAT I or other contract linguists denied an interim clearance, LSO conducts a fitness determination. LSO then forwards the results of the fitness determination to CLPSO personnel who notify MEP. Pending successful completion of the screening process, a contract linguist is eligible to serve under the contract. Attendance at the Continental U.S. Replacement Center is the final step in the process.

~~(FOUO)~~ Figure 1. Security Screening Process



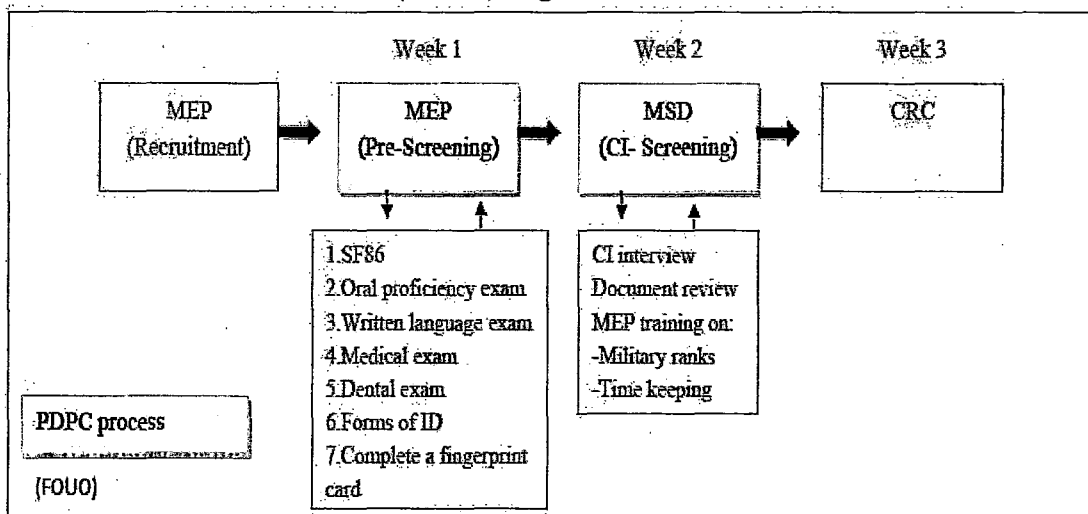
(U) Source: DoD IG

⁵ (U) DISCO turned over adjudication responsibilities to CCF on November 30, 2010.

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~~(FOUO)~~ Figure 2 describes the steps a contract linguist follows while attending MEP's Pre-Deployment Processing Center (PDPC). PDPC is one component of the overall security screening process and takes place concurrently with the processing of background checks. Specifically, newly recruited contract linguists begin PDPC in waves of approximately 50 per week. In the first week of PDPC, contract linguists complete their Standard Form 85P/86, are given medical and language exams, and establish proof of identity. The second week of PDPC consists of the CI interview conducted by MSD and training on military ranks and timekeeping. Most of PDPC takes place at the MEP office in Linthicum, Maryland, except when MEP personnel escort the contract linguists to Fort Meade, Maryland, for the CI interview by MSD.

~~(FOUO)~~ Figure 2. PDPC



(U) Source: DoD IG

INSCOM and MEP Implementation of Security Provisions for U.S.-Hired Contract Linguists (U)

(U) Overall, INSCOM and MEP had a process in place to implement security provisions in contract no. W911W4-07-D-0010. The process included contractor prescreening, background checks, a CI interview, and an interim security clearance or a fitness determination.

(U) We verified the implementation of security provisions by analyzing supporting documentation from a non-statistical sample of 64 contract linguists selected from a population of 942 contract linguists scheduled for a CI interview from April 1, 2010, through September 30, 2010. We determined whether the security provisions in the contract were implemented effectively. Our review did not include an analysis of whether MEP and Government officials conducted appropriate risk assessments on each contract linguist.

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~~(FOUO)~~ Specifically, we verified contractor prescreening by collecting and analyzing the security questionnaire (Standard Form 85P/86) for all contract linguists in our non-statistical sample. We verified that LSO initiated background checks on contract linguists by analyzing entries from the Contract Linguist Information Program database. We also used entries from the Contract Linguist Information Program database to verify that LSO conducted fitness determinations on CAT I contract linguists. CCF granted interim Top Secret with Sensitive Compartmented Information security clearances to all CAT III contract linguists in our non-statistical sample, while DISCO granted interim Secret security clearances to CAT II contract linguists. See Appendix C for details of the implementation of security provisions we observed.

CI Interview Was Limited by Compressed Time Frames for Processing of Contract Linguists (U)

~~(FOUO)~~ NSCOM - (b)(5), (b)(7)(E)
[REDACTED]

Limited Advance Notice of Interview Dates (U)

~~(FOUO)~~ NSCOM - (b)(5), (b)(7)(E)
[REDACTED]

(U) NSCOM - (b)(5), (b)(7)(E)
[REDACTED]

(U) NSCOM - (b)(5), (b)(7)(E)
[REDACTED]

(U) We collected the Tuesday rosters and MSD weekly rosters for the time period November 2, 2010, through January 3, 2011, and determined the number of days between

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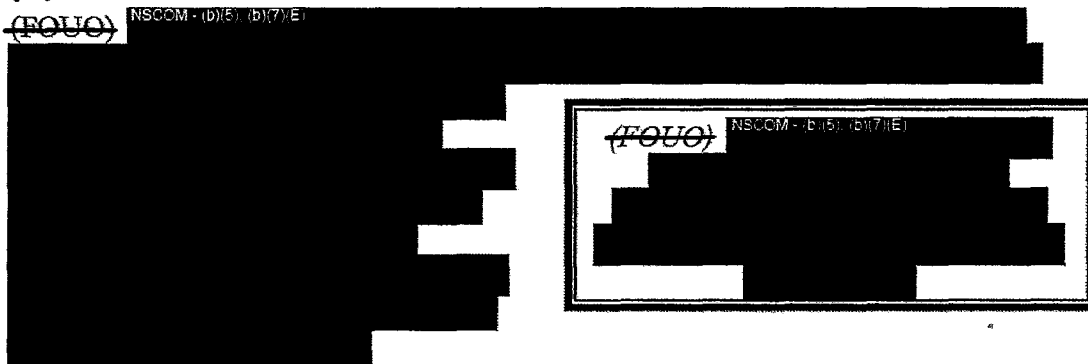
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(U) the Tuesday rosters and the screening dates identified on the MSD weekly rosters. According to the MSD weekly rosters, 127 contract linguists were CI-screened during that time period. The Tuesday rosters identified the linguists by name and included a requested interview date; however, they were sent the week before the linguists needed to be screened, limiting the lead time to, at most, 9 days.

(U) For all 127 linguists, we found that the number of days between the Tuesday rosters and the screening date was between 6 and 9. Therefore, the Tuesday rosters did not meet the requirements in the 2010 memorandum. To address this, the Army should examine and revise the policy, as appropriate, for the requirement to submit a CI interview roster that includes a requested interview date, 28 days in advance of any proposed CI interview.

Background Checks Not Always Completed by Interview Date

(U)



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Conclusion (U)

(U) MSD personnel had limited advance notice of CI interview dates, and background checks had not always been completed by the time of the CI interviews, thereby limiting their ability to conduct thorough interviews. CCF officials stated that there should be a balance between conducting a thorough screening and supplying qualified linguists to support overseas contingency operations. The goal of the security screening process is to enhance force protection by ensuring that contract linguists do not constitute threats to the safety and security of U.S. military personnel or missions. However, the pressure to thoroughly screen contract linguists was matched by the immediate need for qualified linguists, who are in high demand in Afghanistan.

(U)

NSCOM - (S)(5), (S)(7)(E)

Management Comments on the Finding and Our Response (U)

Army Deputy Chief of Staff for Intelligence, G-2 Comments (U)

(U)

NSCOM - (S)(5), (S)(7)(E)

Our Response (U)

(U) We acknowledge that the process for screening contract linguists is constantly evolving. The timeline and statements in our report are accurate based on evidence gathered during fieldwork. The report represents our observations and conclusions during that time. We were not aware of the updated process timeline until we received management comments to the draft report. We met with an INSCOM official in July 2011 to discuss the results of our review and our recommendations, which he generally

(U) agreed with. Additionally, he stated he was not aware of any updates to the screening process.

(U) Our response to the policy requirement to submit a contract linguist roster in advance of any proposed interview is discussed below in our response to management comments to Recommendation 1.

U.S. Central Command Comments (U)

(U) Although not required to comment, the Branch Chief, U.S. Central Command J-2X, responding through the U.S. Central Command Inspector General, agreed with our draft report.

Recommendations, Management Comments, and Our Response (U)

Revised Recommendation (U)

(U) We revised recommendation 1 based on management comments. We revised the recommendation to clarify that the intent is to examine the security screening process and ensure that any change to the process is reflected in Army policy.


(U) We recommend that the Army Deputy Chief of Staff for Intelligence, G-2, in coordination with the Commanding General, U.S. Army Intelligence and Security Command:

1. (U) Initiate action to examine and revise policy, as appropriate, for the requirement to submit a counterintelligence-focused security review and interview roster, that identifies contract linguists by name and proposed interview date, in advance of any proposed linguist interview.

Army Deputy Chief of Staff for Intelligence, G-2 Comments (U)

(U)

NSCOM - (B)(5), (D)(7)(E)



Our Response (U)

(U) The comments were partially responsive. The intent of the recommendation was for Army G-2, in coordination with CLPSO, to examine the policy requirement for submitting a counterintelligence-focused security review and interview roster to MSD in advance of any proposed interview date, and revise policy if necessary. The follow-on review, and subsequent change to the security screening process, fulfills part of that intent. However, the Army policy, which is referenced in contract no. W911W4-07-D-0010, does not reflect the updated process described by Army G-2. We acknowledge that the process for screening contract linguists is constantly evolving and Army policy should be updated to reflect the current process for screening contract linguists. We request the Army Deputy Chief of Staff for Intelligence, G-2, provide comments to the final report.

U.S. Central Command Comments (U)

(U) Although not required to comment, the Branch Chief, U.S. Central Command J-2X, responding through the U.S. Central Command Inspector General, provided a suggestion regarding the wording of Recommendation 1. The wording change would add the statement "to ensure the MSD is provided with a completed background investigation..." 28 days in advance of any proposed linguist interview. Additionally, U.S. Central Command recommended that all identified contract linguist background investigations be provided to MSD and a successful adjudication of the CI interview accomplished before any movement of linguists into the U.S. Central Command Area of Responsibility.

Our Response (U)

(U) We appreciate U.S. Central Command's comments to the recommendation. We did not revise the wording of our recommendation based on U.S. Central Command's suggestion because the revised wording would change the intent of our recommendation. The decision to change policy to require that background checks be completed before the CI interview should be made by Army G-2, based on their examination of all factors involved in the screening process.

2. (U) Perform an analysis to determine the risk of having incomplete contract linguist background checks at the time of the counterintelligence interview, and adjust policy based on the risk analysis.

Army Deputy Chief of Staff for Intelligence, G-2 Comments (U)

(U)

NSCOM - (S)(5), (b)(7)(E)



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(U) checks. The consideration of mission support requirements versus the small number of security clearable, physically able, and willing to deploy linguists has always driven the process back to various versions of the compressed timeline currently being executed.

Our Response (U)

(U) The comments were not responsive. The risk analysis described in the comments applies to the security screening process as a whole. The intent of our recommendation was to determine the risk specifically related to having incomplete background checks at the time of the counterintelligence interview. We request the Army Deputy Chief of Staff for Intelligence, G-2, provide comments to the final report.

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Appendix A. Scope and Methodology (U)

(U) We conducted this performance audit from June 2010 through June 2011 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.

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

- (U) Army G-2
 - (U) LSO
- (U) INSCOM
 - (U) MSD
 - (U) CLPSO
 - (U) CCF
- (U) DISCO
- (U) MEP

(U) We downloaded and reviewed contract no. W911W4-07-D-0010 for linguist support in Afghanistan and the associated 12 modifications to the contract from the Electronic Document Access database.

(U) We reviewed and analyzed Army policy memorandum "Contract Linguist Personnel Security Investigation and Counterintelligence-Focused Security Review Program Policy," September 20, 2010, to determine Army policy for screening contract linguists. We also reviewed and analyzed Army policy memorandum, "Contract Linguist Counterintelligence and Security Screening Policy," May 15, 2008, a precursor to the 2010 memorandum, which also established standards for CI and security screening of contract linguists.

(U) We reviewed the contract statement of work and both Army policy memorandums to determine the screening process for contract linguists. We then visited each of the above organizations to observe the screening process. Finally, we collected documentation from MEP and each Army office to determine whether the security provisions included in the screening standards were being implemented effectively.

(U) We obtained a universe of all contract linguists scheduled for a CI interview under contract W911W4-07-D0010 from April 1, 2010, through September 30, 2010. The Quantitative Methods and Analysis Division developed a sample of 64 items from our population of 942. We used this non-statistical sample of contract linguists to gather supporting documentation and verify each organizations role in the screening process, and we did not make projections.

Use of Computer-Processed Data (U)

(U) We used printouts from the Contract Linguist Information Program database to verify that LSO was initiating background checks on contract linguists. While reviewing the data from the Contract Linguist Information Program database, we found no indication that the data was unreliable.

Prior Coverage (U)

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

GAO (U)

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

DoD IG (U)

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

Army Audit Agency (U)

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

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

Appendix B. Contract Linguist Screening Process (U)

~~(FOUO)~~ The screening process consisted of multiple steps, completed concurrently by MEP, CLPSO, LSO, MSD, CCF, and DISCO. The screening process is usually 3 weeks long, from start to finish. Contract linguists are categorized based on their required level of access to classified information needed to fulfill their prospective duties. There are three categories: CAT I, CAT II, and CAT III.

Pre-screening (U)

(U) The pre-screening begins when CLPSO personnel receive a weekly roster of contract linguists recruited by MEP. CLPSO personnel forward the roster to MSD and LSO. MSD uses the roster to assist in preparing for CI interviews, while LSO initiates record checks.

PDPC (U)

~~(FOUO)~~ At the beginning of the screening process, contract linguists are brought to PDPC at the MEP office in Linthicum, Maryland. PDPC is a 2-week process and is performed 52 weeks a year with approximately 50 contract linguists each week. Every Sunday, a new group or "wave" of contract linguists arrives.

~~(FOUO)~~ During the first week of PDPC, the contract linguists submit the required forms of identification and complete a fingerprint card, an oral proficiency exam, a Standard Form 85P/86, medical and dental screening, and a written language exam.

~~(FOUO)~~ The medical screening includes a physical, as well as applicable blood tests, X-rays, an electrocardiogram, vision and hearing tests, a urine test, and a tuberculosis test. The physician then makes a medical fitness determination on the contract linguist. During pre-screening, each contract linguist is subjected to a preliminary oral proficiency exam administered over the phone by GRACOR Inc., an INSCOM-approved vendor. At PDPC, contract linguists undergo a second oral exam. If the contract linguist fails a second time, they will undergo one last oral exam phone test with GRACOR Inc. If the contract linguist fails again, they are ineligible to serve under the contract. An MEP official stated that approximately 20 to 25 percent of contract linguists are retested for a third time. The written language exams are developed by GRACOR Inc. and new versions are sent to MEP weekly. For each target language (for example, Dari or Pashto) the contract linguist is given a two-part test. Each test is a short essay that the contract linguist must translate in writing onto a blank sheet of paper. The first test requires the contract linguist to translate in writing from the target language to English, and the second test requires translation from English to the target language. An MEP official also noted that if a contract linguist fails the written language exam, INSCOM can issue a waiver, because not all linguist positions require written translation skills.

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~~(FOUO)~~ NSCOM - (b)(7)(E)

[REDACTED]

(U) NSCOM - (b)(7)(E)

[REDACTED]

(U) NSCOM - (b)(7)(E)

[REDACTED]

(U) NSCOM - (b)(7)(E)

[REDACTED]

CAT II, CAT III (U)

~~(FOUO)~~ After the CI interview, CAT II and CAT III contract linguists must be adjudicated for the applicable security clearance. The 2010 memorandum states that CCF will grant interim security clearances for contract linguists (CAT II- CAT III) based on a review of the Standard Form 86, CI screening results, and advance National Agency Check and Federal Bureau of Investigating fingerprint results.

~~(FOUO)~~ Historically, DISCO was responsible for the adjudication of interim and final clearances for CAT II contract linguists. This responsibility has been transferred to CCF. As of November 1, 2010, DISCO stopped receiving new contract linguist cases, and on November 30, 2010, they transferred all remaining open cases to CCF.

~~(FOUO)~~ For CAT II linguists who are deemed ineligible for an interim Secret clearance, CCF notifies CLPSO personnel so that LSO personnel may consider the contract linguist for a CAT I position.

~~FOR OFFICIAL USE ONLY~~

CAT I (U)

~~(FOUO)~~

NSCOM - (b)(7)(E)

~~(FOUO)~~

NSCOM - (b)(7)(E)

~~(FOUO)~~ If disqualifying information is not serious enough to warrant a negative determination, but is of concern to the Department of the Army, LSO can issue a letter of advisement stating that future problems in the area of concern could negatively impact future determinations or result in disciplinary action.

Eligibility Determination (U)

~~(FOUO)~~ Once the CAT I contract linguist receives a fitness determination, CLPSO makes an eligibility determination. We collected documentation from CLPSO representatives to verify that MEP personnel are notified when CAT I contract linguists have cleared the CI screening process. CLPSO only notifies MEP personnel regarding CAT I contract linguists. MEP's Special Security Office is automatically notified that the contract linguist's security clearance was updated in the Joint Personnel Adjudication System for CAT II and CAT III contract linguists.

⁶ ~~(FOUO)~~

NSCOM - (b)(7)(E)

Appendix C. INSCOM and MEP Implementation of Security Provisions (U)

(U) Overall, INSCOM and MEP effectively implemented security provisions, such as contractor prescreening, background checks, and an interim security clearance or a fitness determination, for contract no. W911W4-07-D-0010. The security screening process consists of multiple steps, completed concurrently by several organizations, including MEP, CLPSO, LSO, MSD, CCF, and DISCO. Using a non-statistical sample of contract linguists, we analyzed documentation from each of those organizations to verify implementation of security provisions. The following sections describe our review of each organization involved in the security screening process.

(U) The contract statement of work references the 2010 memorandum; however, the 2008 memorandum was in effect until September 20, 2010, and, therefore, in effect during the time the contract linguists in our non-statistical sample were screened.


MEP (U)

~~(FOUO)~~ Security provisions in the 2008 memorandum require MEP personnel to conduct a pre-screening of contract linguists, which initiates the security review process. MEP personnel document the results of this review in a security questionnaire (Standard Form 85P/86) and make them available to the Government upon request. We verified these security provisions by reviewing the Standard Form 85P/86s for the linguists in our sample. We found that MEP personnel implemented the security provisions in the contract.

MSD (U)

~~(FOUO)~~

NSCCM - (b)(7)(E)



LSO (U)

(U) The 2008 memorandum does not direct specific responsibilities to LSO personnel; however, they contribute to the screening of contract linguists by initiating background checks, maintaining the Contract Linguist Information Program database, and making fitness determinations on CAT I contract linguists. We reviewed Contract Linguist Information Program-generated printouts for each linguist in our sample and verified that LSO was initiating background checks and conducting fitness determinations on CAT I contract linguists.

CLPSO (U)

(U) The 2008 memorandum does not direct specific responsibilities to CLPSO personnel however, they do contribute to the screening of contract linguists by integrating all organizations involved in the process. During fieldwork, we saw several examples of CLPSO personnel fulfilling this responsibility. Additionally, CLPSO personnel notify MEP when CAT I linguists have completed the security screening process. We reviewed documentation from CLPSO for the CAT I linguists in our sample and found that CLPSO personnel are properly notifying MEP.

CCF (U)

(U) CCF was not directed any specific responsibilities in the 2008 memorandum; however, security provisions in the contract state that CCF will make adjudicative decisions regarding interim and final Top Secret with Sensitive Compartmented Information clearances. We verified this by reviewing documentation from the Joint Personnel Adjudication System for each of the CAT II linguists in our non-statistical sample. We found that CCF made adjudicative decisions for interim and final Top Secret with Sensitive Compartmented Information access eligibility for 4 of the 64 linguists in our non-statistical sample. This matches data from CLPSO, showing four contract linguists hired under their Top Secret with Sensitive Compartmented Information clearances. Based on our review, we determined that CCF effectively implemented the security provisions in the contract.

DISCO (U)

~~(FOUO)~~ Security provisions in the 2008 memorandum require that DISCO personnel grant Secret security clearances for CAT II linguists. We reviewed documentation from the Joint Personnel Adjudication System provided by DISCO personnel and found that they made adjudicative decisions for interim and final Secret eligibility for 50 of the 54 CAT II linguists in our non-statistical sample. Three CAT IIs were either separated from, or not hired by MEP and one received a clearance in 2008. Based on our review, we determined that DISCO effectively implemented the security provisions in the contract.

Army Deputy Chief of Staff for Intelligence, G-2 Comments (U)

Final Report
Reference

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19 August 2011

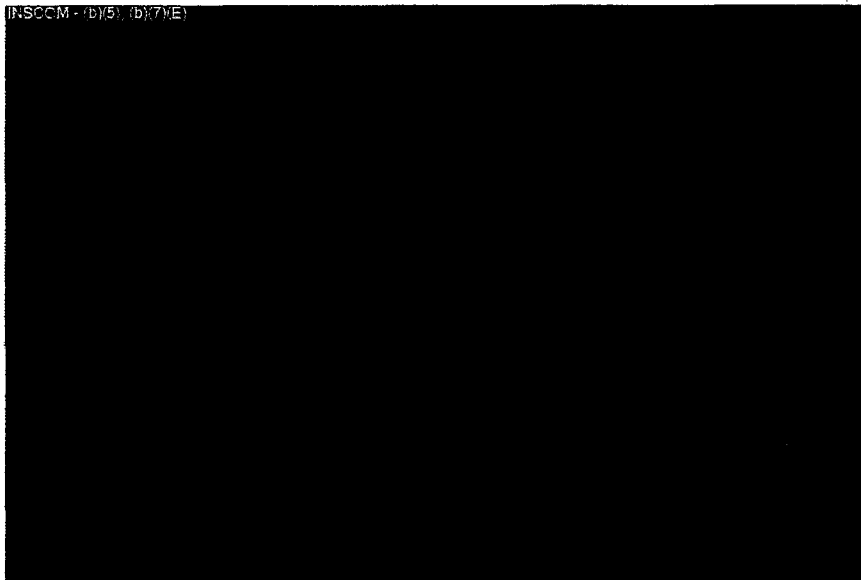
MEMORANDUM FOR Inspector General, Department of Defense, 400 Army Navy
Drive, Arlington, VA 22202

SUBJECT: Counterintelligence Interviews for U.S.-Hired Contract Linguists Could Be
More Effective (Project No. D20100D000JA-0165.001) (U)

1. Purpose. To provide HQDA G-2 response to the subject draft report and associated
findings.

2. Discussion. Each of the DODIG's Findings and Recommendations are addressed
below. DA G-2 compiled responses from the Contract Linguist Program Support Office
(CLPSO), the 902d MI GP, and the Principal Assistant Responsible for Contracting
(PARC).

INSCCM - (b)(5), (b)(7)(E)



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Revised,
recommendation on
page 10

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Inspector General
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