



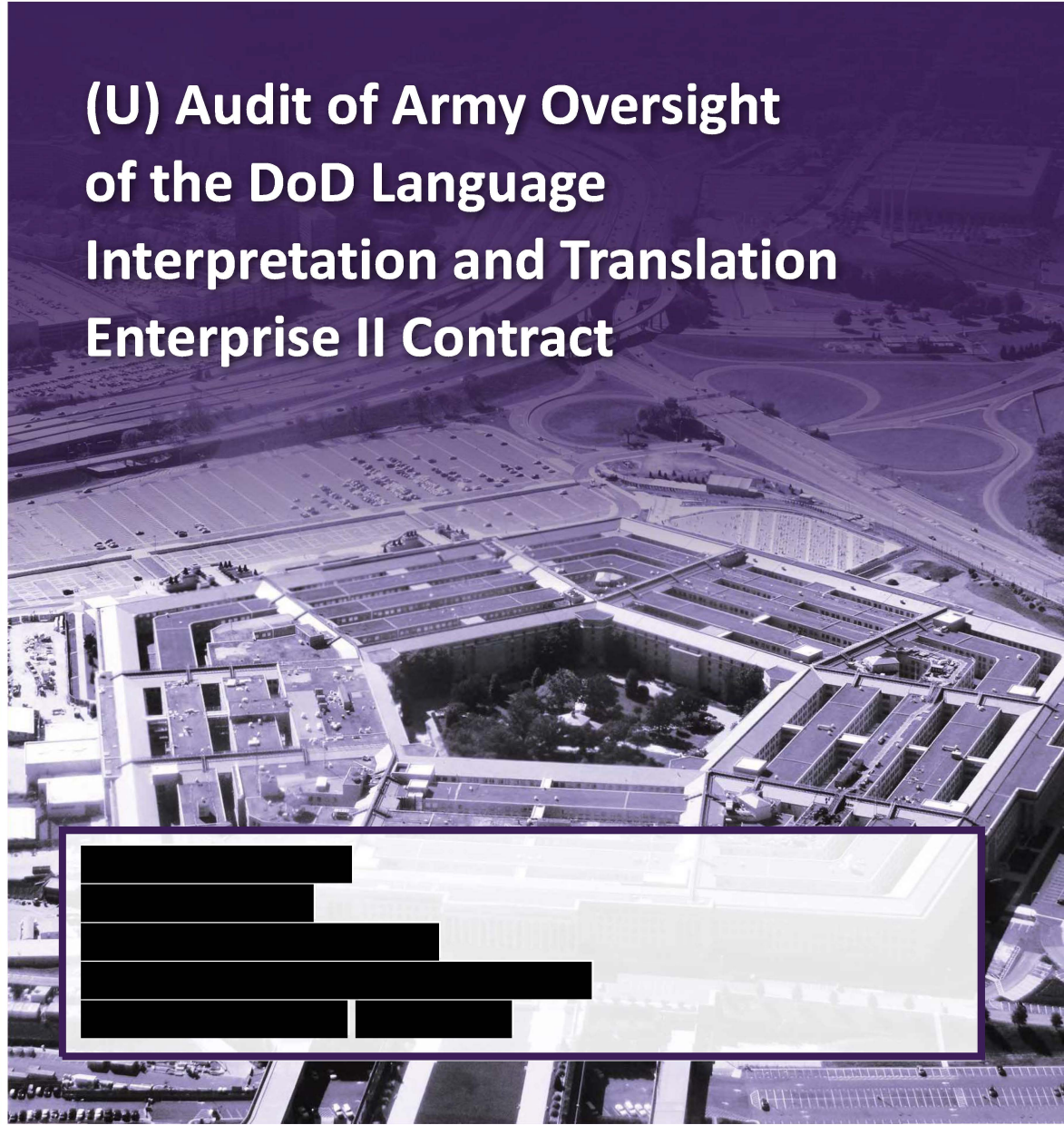
# INSPECTOR GENERAL

*U.S. Department of Defense*

JANUARY 9, 2024



## (U) Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract



INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE







# (U) Results in Brief

## *(U) Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract*

January 9, 2024

### (U) Objective

(U) The objective of this audit was to determine whether the Army provided effective oversight of the DoD Language Interpretation and Translation Enterprise (DLITE) II contract in the U.S. Central Command area of responsibility to ensure contractors fulfilled requirements.

### (U) Background

(U) In 2017, the Army awarded three task orders under the DLITE II contract for language services throughout the U.S. Central Command area of responsibility. The Army Contracting Command–Detroit Arsenal (ACC-DTA) and Contract Linguist and Intelligence Program Support Office (CLIPSO) are responsible for contract oversight, including performing quality assurance, and military end users provide day-to-day direction of linguist work. Both CLIPSO and the military end users are responsible for alerting contracting officers of any performance issues or alleged security incidents.

### (U) Findings

(U) ACC-DTA and CLIPSO provided effective oversight of the DLITE II contractor fill rates for linguists from March 2021 through February 2022 for Contractors A, B, and C. However, ACC-DTA and CLIPSO oversight officials did not document contractor performance in monthly reports in accordance with designation letter and quality assurance surveillance plan requirements, and did not complete annual contractor performance evaluations in

### (U) Findings (cont'd)

(U) a timely manner. This occurred because of a preference among the oversight officials for oral feedback instead of documenting contractor performance, and a lack of guidance.

(U) As a result of incomplete or partially completed monthly reports there is an increased risk that the contracting officer's representative and contracting officer may be unaware of potential issues and challenges regarding the task orders at the military end user level. Additionally, as a result of untimely annual evaluations for Contractors A, B, and C, there is a lack of past performance data that could impact the process for determining future awards.

(U) Furthermore, CLIPSO oversight officials did not properly address, in a timely manner, and fully document alleged security incidents for three Contractor C linguists. This occurred because CLIPSO did not establish a process to ensure consistent reporting, reviewing, and documenting the resolution of alleged security incidents involving contracted linguists in a timely manner. Without CLIPSO formalizing and consistently implementing a process to ensure security incidents are resolved, there is risk of endangering U.S. military, Coalition, and civilian personnel, in addition to an increased risk that a linguist could leak classified information.

### (U) Recommendations

(U) Because of the actions taken by ACC-DTA officials, we did not make recommendations related to our findings on documenting contractor performance. However, with regard to alleged linguist security incidents, we made two recommendations, including that the CLIPSO Director establish and document roles, responsibilities, and processes for reviewing linguist security concerns and maintaining in the contract file all supporting documentation, including the decision to either retain or direct the contractor to remove linguists on the task order.



# (U) Results in Brief

## *(U) Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract*

### **(U) Management Comments and Our Responses**

(U) Among other comments, CLIPSO officials agreed with both recommendations. CLIPSO officials stated that they updated the CLIPSO Contract Linguist Handbook to include the applicable roles, responsibilities, and processes. Both recommendations are resolved but will remain open. We will close the recommendations once we receive the documentation and verify that the actions taken fully address the recommendations.

(U) Please see the Recommendations Table on the next page for the status of recommendations.



## ***(U) Recommendations Table***

<b>(U)</b> <b>Management</b>	<b>Recommendations Unresolved</b>	<b>Recommendations Resolved</b>	<b>Recommendations Closed</b>
(U) Director, Contract Linguist and Intelligence Program Support Office	None	B.1, B.2	None <b>(U)</b>

**(U) Note:** The following categories are used to describe agency management’s comments to individual recommendations.

- **(U) Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **(U) Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **(U) Closed** – DoD OIG verified that the agreed upon corrective actions were implemented.







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

January 9, 2024

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION AND SUSTAINMENT  
UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS  
COMMANDER, U.S. CENTRAL COMMAND  
DIRECTOR, JOINT STAFF  
AUDITOR GENERAL, DEPARTMENT OF THE ARMY  
AUDITOR GENERAL, DEPARTMENT OF THE NAVY  
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

SUBJECT: (U) Audit of Army Oversight of the DoD Language Interpretation and Translation  
Enterprise II Contract (Report No. DODIG-2024-042)

(U) This final report provides the results of the DoD Office of Inspector General's audit. We previously provided copies of the draft report and requested written comments on the recommendations. We considered managements' comments on the draft report when preparing the final report. These comments are included in the report.

(U) The Contract Linguist and Intelligence Program Support Office Director agreed to address all recommendations presented in the report; therefore, we consider the recommendations resolved and open. We will close the recommendations when you provide us documentation showing that all agreed-upon actions to implement the recommendations are completed. Therefore, please provide us within 90 days your response concerning specific actions completed on the recommendations. Send your response to either [followup@dodig.mil](mailto:followup@dodig.mil) if unclassified or [rfunet@dodig.smil.mil](mailto:rfunet@dodig.smil.mil) if classified SECRET.

(U) If you have any questions, please contact me at [REDACTED]. We appreciate the cooperation and assistance received during the audit.

FOR THE INSPECTOR GENERAL:

Richard B. Vasquez  
Assistant Inspector General for Audit  
Readiness and Global Operations



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## (U) Introduction

### (U) Objective

(U) The objective of this audit was to determine whether the Army provided effective oversight of the DoD Language Interpretation and Translation Enterprise (DLITE) II contract in the U.S. Central Command (USCENTCOM) area of responsibility to ensure contractors fulfilled requirements. See Appendix A for a discussion of our scope and methodology.

### (U) Background

The DoD considers foreign language skills and associated regional expertise as competencies essential to the DoD mission. The DoD supplements military-trained linguists with contracted linguists to support military operations around the world. The U.S. Army Intelligence and Security Command (INSCOM) conducts intelligence and security operations worldwide and contracts for linguist services in support of Army, Joint, and Coalition commands and the U.S. intelligence community. As part of INSCOM, the Contract Linguist and Intelligence Program Support Office (CLIPSO) provides centralized program management and oversight of contracted foreign language translation, transcription, and interpretation services (language services).<sup>1</sup> As of March 2022, CLIPSO used contracted linguists to provide [REDACTED]

(U) In March 2017, INSCOM awarded the DLITE II indefinite-delivery indefinite-quantity contract to 20 companies with a \$9.9 billion ceiling to provide language services. In 2018, INSCOM completed the transfer for all contract authority over INSCOM contracts, which includes completing annual contractor performance evaluations (annual evaluations), to the Army Contracting Command and specifically to the Army Contracting Command–Detroit Arsenal (ACC-DTA) for the DLITE II contract. The primary objective of the DLITE II contract is to provide the right linguist, to the right location, at the right time to perform language services.

<sup>1</sup> (U) Translation requires written translations from one source of text in one language to another language. Transcription requires written translations of oral, video, or other sources from one language to another language. Interpretation requires speaking ability of both the required foreign language and English.

(U) The DLITE II contract requires linguists to meet proficiency standards in English and the languages they are contracted for, as well as meet specific security clearance requirements. Depending on the security clearance required, contractors provide different categories of linguists. The DLITE II contract defines the following categories of linguists.

- (U) Category I local national: a linguist hired locally in the country of origin who does not require a security clearance.
- (U) Category I U.S.: a linguist hired in the United States who does not require a security clearance.
- (U) Category II: a linguist who is a U.S. citizen and is granted an interim SECRET security clearance.
- (U) Category III: a linguist who is a U.S. citizen and possesses an interim or final TOP SECRET security clearance with access to Sensitive Compartmented Information.

**(U) USCENTCOM Task Orders**

(U) In 2017, INSCOM awarded three task orders under the DLITE II contract with a \$1.5 billion ceiling for language services throughout the USCENTCOM area of responsibility, including Kuwait, Qatar, Iraq, and Syria. The task orders each had a 1-year base period with 4 option years and additional 6-month option periods available. Contractor A and B task orders were firm-fixed-price, level-of-effort, which means that the contractor was paid a set price for each linguist hired. The Contractor C task order was a cost-plus-fixed-fee-term, which means that the contractor was paid a set price for each linguist hired based on the number of hours the linguist worked plus a fixed fee for each performance period.

(U) See Table 1 for a summary of the three task orders we reviewed, performance periods, and ceiling values as of October 1, 2022.

*(U) Table 1. Summary of Task Orders*

(U) Contractor	Task Order Type	Total Linguists Required	Performance Period	Ceiling Value
Contractor A	Firm-fixed-price level-of-effort	261	June 30, 2017– September 29, 2023	\$335.8 million
Contractor B	Firm-fixed-price level-of-effort	92	March 3, 2017– October 27, 2023	\$591.8 million
Contractor C	Cost-plus-fixed-fee-term	418	June 29, 2017– September 29, 2023	\$615.6 million
Totals		771		\$1.5 billion (U)

(U) Source: The DoD OIG.



(U) Contracted linguists support a variety of missions requiring language services. For example, in the USCENTCOM area of responsibility, contracted linguists have supported Operation Inherent Resolve, Operation Freedom's Sentinel, Operation Allies Refuge, and Operation Spartan Shield. Specifically, contracted linguists are assigned tasks including interpreting at entry control points, supplementing the work of military linguists coordinating with the Russian military in Syria, and assisting the Area Support Group-Kuwait Screening Cell in interviews of Other Country Nationals applying to work on Camp Arifjan, Kuwait.<sup>2</sup> Contracted linguists can also be assigned language services related to intelligence operations and collection activities. In August 2021, Contractor B started to provide linguists in support of Operation Allies Welcome in the United States.<sup>3</sup>

### ***(U) DLITE II Task Order Documents***

(U) The three DLITE II task orders each included the Federal Acquisition Regulation (FAR)-required performance work statement (PWS) and quality assurance surveillance plan (QASP), as well as a list of required linguists.

(U) FAR Parts 2 and 37 require the agency head to define the contract requirements in a PWS that uses clear, specific, and objective terms.<sup>4</sup> In addition, the PWS must include measureable outcomes to determine whether contractor performance meets the agency's requirements.<sup>5</sup> For example, the PWS for each DLITE II task order required linguists generally to work 8 to 12 hours per day, 6 to 7 days per week, and to be available on-call the remainder of the day.

(U) FAR Part 46 states that a QASP should be prepared in coordination with the PWS and should identify all work requiring oversight and the type of oversight to be performed.<sup>6</sup> Oversight officials can perform contract oversight at any time or location deemed necessary to verify that services conform to contract requirements.<sup>7</sup>

<sup>2</sup> (U) Area Support Group-Kuwait operates as the base operations support integrator and security coordinator for U.S. Army bases in Kuwait and provides support for reception, staging, onward movement, and integration of forces to facilitate theater operations.

<sup>3</sup> (U) Operation Allies Welcome was an effort across the U.S. Government to support Afghan evacuees as they resettled in the United States. Operation Allies Welcome started in August 2021.

<sup>4</sup> (U) FAR Part 2, "Definitions of Words and Terms," and FAR Part 37, "Service Contracting," Subpart 37.5, "Management Oversight of Service Contracts," Section 37.503, "Agency-head Responsibilities," and Subpart 37.6, "Performance-Based Acquisition," Section 37.602, "Performance Work Statement."

<sup>5</sup> (U) FAR 37.602, "Performance Work Statement."

<sup>6</sup> (U) FAR Part 46, "Quality Assurance," Subpart 46.4, "Government Contract Quality Assurance," Section 46.401, "General."

<sup>7</sup> (U) FAR 46.401, "General."

(U) The PWS for each DLITE II task order included a list of required linguists, which provided the total number of linguists and specific languages. The PWS stated that fulfilling the list of required linguists was critical to meeting the contract requirements. Additionally, the PWS required ACC-DTA contracting officers to factor the contractor's ability to fulfill the list of required linguists into the required annual contractor performance evaluation. The contracting officer can issue contract modifications to update the list of validated linguist requirements, also known as the technical exhibit.

### ***(U) Contract Oversight and Linguist Management***

(U) The Army uses a multi-layered approach to provide contract oversight and ensure compliance with the terms of the DLITE II task orders. The ACC-DTA and CLIPSO are responsible for contract oversight, including performing quality assurance. Military end users provide day-to-day direction of linguist work. Both CLIPSO and the military end users are responsible for alerting contracting officers of any performance issues or alleged security incidents.

### ***(U) Contract Oversight Roles and Responsibilities***

(U) The ACC-DTA's Linguist Support Services Branch administered the DLITE II task orders and appointed a contracting officer for each task order. In addition to ensuring that a contract conforms to all applicable laws and regulations, the contracting officer is responsible for ensuring both the contractor and the Government comply with the terms of the contract.<sup>8</sup>

(U) Additionally, FAR Part 4 requires contracting agencies to maintain documentation of all contract actions and establish contract files that contain quality assurance records and the records of all contractual actions.<sup>9</sup> FAR Part 42 requires the contracting officer to prepare past performance evaluations at least annually and include relevant information that accurately depicts the contractor's performance based on objective facts supported by data.<sup>10</sup> The Defense FAR Supplement and Procedures, Guidance, and Information requires the contracting officer to, at minimum, annually review the contract file for accuracy and completeness and document the results in the Surveillance and Performance Monitoring tool.<sup>11</sup> The tool contains a checklist for the review that includes verifying that the file contains documents such as surveillance reports and contractor assessments.

<sup>8</sup> (U) FAR Part 1, "Federal Acquisition Regulations System," Subpart 1.6, "Career Development, Contracting Authority, and Responsibilities," Section 1.601, "General," and Section 1.602, "Contracting officers."

<sup>9</sup> (U) FAR Part 4, "Administrative and Information Matters," Subpart 4.8, "Government Contract Files," Sections 4.801, "General," 4.802, "Contract files," and 4.803, "Contents of contract files."

<sup>10</sup> (U) FAR Part 42, "Contract Administration and Audit Services," Subpart 42.15, "Contractor Performance Information," Section 42.1502, "Policy," and Section 42.1503, "Procedures."

<sup>11</sup> (U) Defense FAR Supplement Procedures, Guidance, and Information Part 201, "Federal Acquisition Regulations System," Subpart 201.6, "Career Development, Contracting Authority, and Responsibilities," Section 201.602-2, "Responsibilities."

(U) While only the contracting officer can obligate the Government or change the terms of the contract, the contracting officer is required to designate, in writing, a contracting officer's representative (COR) on all task orders. For DLITE II task orders, the ACC-DTA contracting officers were responsible for designating CORs from CLIPSO to serve as the eyes and ears of the contracting officer. Because the DLITE II task orders included overseas requirements, the ACC-DTA also designated an alternate COR (ACOR) from CLIPSO for each task order.

For the three task orders we reviewed, the CORs and ACORs operated out of different locations. The CORs were located in the United States at CLIPSO headquarters in Virginia, and the ACORs were located in Kuwait, Qatar, and Iraq.

The CORs and ACORs were responsible for monitoring contractor performance against the task orders' PWS and QASP and were required to submit monthly reports on contractor performance to the contracting officer. According to the QASP, the monthly reports must include, among other requirements, information related to significant events, the results of inspections, discrepancy notices, and ongoing issues. These reports provide information regarding potential challenges that may require the contracting officer's input to resolve. Furthermore, CORs and ACORs were required to report to their respective contracting officer, in writing, any performance issues or delays by the contractor in providing language services.

The CLIPSO Director, CORs, and ACORs have certain responsibilities to report, review, and document alleged linguist security incidents, and if appropriate, remove linguists from the task order. According to the CLIPSO Director, the ACOR is responsible for notifying the COR of all alleged linguist security incidents and assisting in gathering information to substantiate the allegations. According to the Contract Linguist Screening and Vetting Policy,

.<sup>12</sup> The COR's designation letter requires the COR to report to the contracting officer alleged security violations committed by contracted linguists. According to the CLIPSO Deputy Director and the COR, the COR is then responsible for reviewing the alleged security incident to gain an understanding of the issue from all parties involved. The Director further stated that if the COR determines that a linguist is perceived as a threat to personnel or the mission, the COR will coordinate with the CLIPSO Director to direct the contractor to remove the linguist from the contract.

<sup>12</sup> (U) Department of the Army Office of the Deputy Chief of Staff, G-2, "Contract Linguist Screening and Vetting Policy," March 29, 2019.



### *(U) Linguist Management Roles and Responsibilities*

[REDACTED]

The CLIPSO guide for military end users and the CLIPSO Contract Linguist Handbook require military end users to document all alleged security incidents in a memorandum for record (MFR) and report the alleged incident to the contractor's management, the ACOR, the unit's security officer, and the base defense operations center.<sup>13</sup>

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<sup>13</sup> (U) CLIPSO Contract Linguist Handbook, March 2022.

## (U) Finding A

### (U) The ACC-DTA and CLIPSO Ensured Adequate Linguist Fill Rates but Did Not Meet All Reporting Requirements

(U) The ACC-DTA and CLIPSO contracting officers, CORs, and ACORs (oversight officials) provided effective oversight of the DLITE II contractor fill rates from March 2021 through February 2022 for Contractors A, B, and C providing linguists in the USCENTCOM area of responsibility, including Kuwait, Qatar, Iraq, and Syria. However, ACC-DTA and CLIPSO oversight officials did not document contractor performance in monthly reports in accordance with designation letter and QASP requirements and did not complete annual evaluations in a timely manner, as shown in the following bullets.

- (U) The CORs and ACORs fully completed only 16 (22 percent) of 72 required monthly contractor performance reports for all three task orders in accordance with designation letter and QASP requirements from March 2021 through February 2022. The CORs and ACORs did not complete 26 (36 percent) of 72 monthly reports and partially completed 30 (42 percent) of 72 reports. The CORs and ACORs did not complete or partially completed contractor performance reports because they considered documentation redundant of PowerPoint presentations used during recurring meetings, and there was a preference among the oversight officials for oral feedback to communicate contractor performance. In addition, ACC-DTA officials stated that the contracting officers did not expect reports from the ACORs in practice, though they were required by the designations letters and QASPs.
- [REDACTED] The contracting officers did not complete annual evaluations in a timely manner for all three task orders. The ACC-DTA Linguist Support Services Branch Chief (Branch Chief) stated that the contracting officers did not complete required annual evaluations because a 2018 Office of the Under Secretary of Defense for Acquisition and Sustainment memorandum [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] In addition, the Branch Chief stated that ACC-DTA inherited disorganized contract files from INSCOM, which caused lapses in completing the required evaluations.

(U) As a result of incomplete or partially completed monthly ACOR reports and subsequent COR reports, there is an increased risk that the COR and contracting officer will be unaware of potential issues and challenges regarding the task orders at the military end user level. For example, during our site visits, 11 out of 25 military end users we interviewed stated that they either did not have enough linguists or the correct language support. We could not verify that the linguists the military end users stated they needed were required by the technical exhibit at that time. We also did not identify where these challenges had been communicated to the ACOR or COR, or documented in a report from March 2021 through February 2022. Additionally, as a result of untimely annual evaluations for Contractors A, B, and C, there is a lack of past performance data that could impact the process for determining future awards. Although the current task orders transitioned on July 29, 2023, to the new USCENTCOM II task order, these three contractors may still bid on future contracts for language or other services.

### **(U) ACC-DTA and CLIPSO Provided Effective Oversight of the DLITE II Fill Rates**

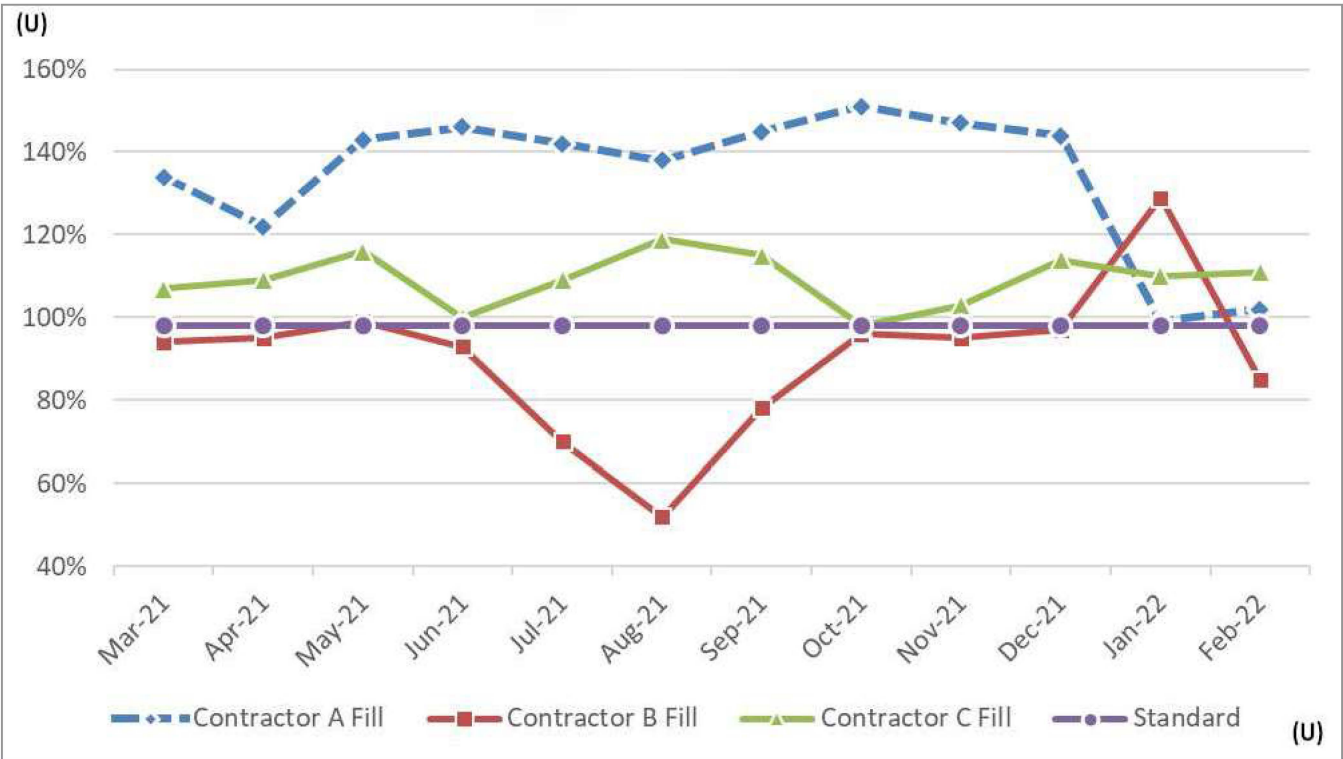
(U) ACC-DTA and CLIPSO oversight officials provided effective oversight of the DLITE II contractor fill rates from March 2021 through February 2022 for Contractors A, B, and C. Each task order included a performance rating system for the contracting officers and CORs to measure the contractors' fill rate. The fill rate is a performance metric that represents the percentage of linguist requirements that the contractor has filled. The CORs are responsible for overseeing the contractors' performance and reporting the contractors' fill rate to the contracting officer. The PWS for all three task orders required a 98-percent fill rate. The Contractor A and C PWS' further required that if the fill rate fell below 98 percent, the contractor should have the unfilled linguist requirements actively in the onboarding process. The onboarding process includes obtaining a security clearance and attending training at the Continental United States Replacement Center.<sup>14</sup> For example, if 95 percent of the requirements are filled, the contractor should also have the other 3 percent of the required linguists in the onboarding process.

<sup>14</sup> (U) The Continental United States Replacement Center's mission is to receive, process, equip, train, and verify medical readiness of contractors' deploying outside the United States.

(U) From March 2021 through February 2022, ACC-DTA and CLIPSO officials ensured that the fill rates were adequate (at least 98 percent), according to the PWS requirements. We analyzed the fill rate for the last day of each month to determine if the fill rate, combined with personnel in the onboarding process, was at or above 98 percent. Contractor A and C's combined fill rates were at or above 98 percent for all 12 months. Contractor B's combined fill rate was at or above 98 percent for 2 of 12 months. According to ACC-DTA, in the 10 instances where Contractor B did not meet the 98-percent fill rate requirement, they attributed the causes to a valid Government delay, such as a lack of slots at the Continental United States Replacement Center; rapidly changing requirements during the drawdown from Afghanistan; or low fill rates addressed by the contractor through a corrective action plan. For example, the Contractor B contracting officer issued a memorandum to Contractor B in December 2021 stating that the 64-percent fill rate for Contractor B's requirements was concerning and requested a corrective action plan to reduce the vacancies and reach the contractually mandated performance standard of 98 percent. Contractor B provided a corrective action plan that outlined the tasks and associated completion dates to fill the vacancies. Figure 1 shows the fill rates we calculated for March 2021 through February 2022 for all three contractors.

(U) From March 2021 through February 2022, ACC-DTA and CLIPSO officials ensured that the fill rates were adequate.

(U) Figure 1. Contractors A, B, and C Fill Rates March 2021 Through February 2022



(U) Source: The DoD OIG.



## (U) CLIPSO CORs and ACORs Did Not Complete or Partially Completed Monthly Contractor Performance Reports and Preferred Oral Feedback

(U) The CORs and ACORs only completed 16 (22 percent) of 72 required monthly contractor performance reports for all three task orders in accordance

*(U) The CORs and ACORs did not complete 26 (36 percent) of 72 monthly reports and partially completed 30 (42 percent) of 72 reports.*

with their designation letters and QASP requirements from March 2021 through February 2022. The CORs and ACORs did not complete 26 (36 percent) of 72 monthly reports and partially completed 30 (42 percent) of 72 reports.

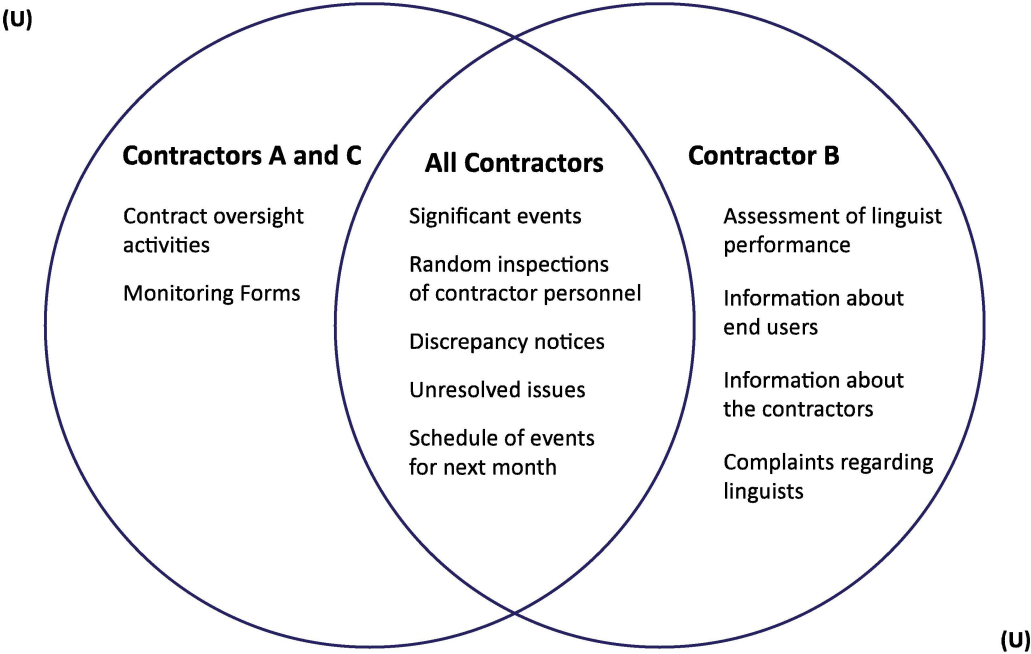
(U) The Contractor A, B, and C COR designation letters required the CORs to submit a monthly report to the contracting officer documenting the contractor's performance. For example, the COR designation letters required the CORs to report monthly the contractor's performance of services and payment status. Additionally, the FAR requires a QASP to be prepared in conjunction with the PWS.<sup>15</sup> The Contractor A, B, and C designation letters or QASPs required the ACORs to submit a monthly report to the contracting officer on the contractors' performance. Specifically, as part of the monthly reports, the Contractor A and C QASPs required ACORs to include inspection, survey, and monitoring forms that are intended to measure the quality of service linguists provided and whether military end users received the required linguists. The Contractor B QASP did not require ACORs to complete or include monitoring forms as part of the monthly reports. However, CLIPSO and the ACC-DTA's overall obligation for monitoring contractor performance remained the same. The CLIPSO Director did not provide further explanation for the differences between the three QASPs.

(U) The CORs and ACORs did not complete or partially completed contractor performance reports because they considered the documentation redundant of PowerPoint presentations used during recurring meetings, and a preference among the oversight officials for oral feedback to communicate contractor performance. In addition, ACC-DTA officials stated that the contracting officers did not expect reports from the ACORs in practice, though the reports were required in the designation letters and QASPs.

<sup>15</sup> (U) FAR 46.401, "General."

(U) Figure 2 describes the required elements of ACOR reports in the Contractors’ A, B, and C QASPs.

(U) Figure 2. Required Elements of Monthly ACOR Reports



(U) Source: The DoD OIG.

**(U) CLIPSO CORs and ACORs Did Not Complete or Partially Completed Monthly Contractor Performance Reports**

(U) From March 2021 through February 2022, of the 72 required monthly contractor performance reports, the CORs and ACORs:

- (U) fully completed 16 monthly reports,
- (U) did not complete 26 of the monthly reports, and
- (U) partially completed 30 monthly reports.

(U) Table 2 provides a breakdown of the 72 COR and ACOR reports from March 2021 through February 2022.

(U) Table 2. COR and ACOR Reports, March 2021 Through February 2022

(U)	Reports Not Completed		Partially Completed Reports		Completed Reports	
	COR	ACOR	COR	ACOR	COR	ACOR
Contractor A	3 of 12	4 of 12	9 of 12	8 of 12	0 of 12	0 of 12
Contractor B	12 of 12	1 of 12	0 of 12	3 of 12	0 of 12	8 of 12
Contractor C	1 of 12	5 of 12	3 of 12	7 of 12	8 of 12	0 of 12
Subtotal	16 of 36	10 of 36	12 of 36	18 of 36	8 of 36	8 of 36
Total	26 of 72 (36 percent)		30 of 72 (42 percent)		16 of 72 (22 percent)	

(U) Source: The DoD OIG.

**(U) COR Reports for All Three Contractors**

(U) The CORs for all three contractors did not fully complete 28 of 36 required monthly reports from March 2021 through February 2022. Specifically, for the period of March 2021 through February 2022, the:

(U) Contractor B COR did not complete any of the 12 required monthly reports.

- (U) Contractor A COR did not complete 3 of the 12 required monthly reports and partially completed 9 reports. The nine partially completed reports did not include the payment status report as required in the COR designation letter.
- (U) Contractor B COR did not complete any of the 12 required monthly reports.
- (U) Contractor C COR partially completed 3 of 12 required monthly reports, did not complete a report in May 2021, and completed 8 reports. The three partially completed reports did not contain the required payment status report.

**(U) ACOR Reports for Contractors A and C**

(U) From March 2021 through February 2022, the Contractor A ACOR did not complete four monthly reports, and the Contractor C ACOR did not complete five monthly reports. The Contractor A and C ACORs partially completed eight and seven reports, respectively, none of which fully addressed all required elements from the QASP. Specifically, neither ACOR included the required monitoring forms. The monitoring forms are intended to capture results of the ACORs’ surveillance of contractor performance including a narrative of observations and the frequency and type of inspections that provide the contracting officer visibility of contractor performance. For example, the ACOR should document whether the inspections are random, periodic, or provide 100 percent coverage.

(U) Additionally, the Contractor A and C ACORs inconsistently reported on discrepancy notices, the status of unresolved issues, and the schedule of upcoming events. Some ACOR monthly reports documented meetings and site visits in the schedule of events sections, other reports included “not applicable,” while some were blank in the schedule of events sections. For example, in November 2021 and January 2022, the Contractor C ACOR documented site visits to Iraq and meetings with the linguist managers. However, monthly reports without detailed information in the schedule of events section could make it difficult for the contracting officer to determine whether that section was overlooked or there was nothing to report. Table 5 in Appendix B provides a comparison of required elements of the ACOR reports with each monthly report completed by the Contractors A and C ACORs for March 2021 through February 2022.

### ***(U) ACOR Reports for Contractor B***

(U) From March 2021 through February 2022, the Contractor B ACOR did not complete the monthly report for April 2021, partially completed three reports, and completed eight reports. In the three partially completed reports, the Contractor B ACOR did not consistently address unresolved issues related to linguist performance and staffing, and a schedule of events, such as oversight travel plans, for the next month. Table 6 in Appendix B provides a comparison of required elements of the ACOR reports with each monthly report completed by the Contractor B ACOR from March 2021 through February 2022.

### ***(U) CLIPSO Oversight Officials Preferred Oral Feedback Rather Than Completing Required Monthly Contractor Performance Reports***

(U) The CORs and ACORs did not complete or partially completed contractor performance reports because they considered documentation redundant of PowerPoint presentations from recurring meetings and there was a preference among the oversight officials for oral feedback to communicate contractor performance. The contracting officers, CORs, and ACORs conducted recurring meetings to discuss performance and oversight of the DLITE II contract. Oversight officials stated that during these meetings they discussed the status of their individual task orders, including any emerging or ongoing issues. For example, the Contractor B contracting officer stated that the COR already shared contractor performance information in weekly meetings.



█ In January 2021, the Branch Chief began using PowerPoint presentations during recurring meetings with the ACORs, CORs, contracting officers, and the CLIPSO Director to improve DLITE oversight.

The Branch Chief stated that the process of implementing the PowerPoint presentations took several months because of competing workloads. For example, the Contractor B contracting officer stated that they were responsible for administering over 15 contracts. The Branch Chief further stated that they worked to continuously improve the PowerPoint presentation format. █

█ (U) In January 2021, the Branch Chief began using PowerPoint presentations during recurring meetings to improve DLITE oversight.

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(U) In addition, the Branch Chief stated that the contracting officers did not expect reports from the ACORs in practice, though required by the designation letters and QASPs. Furthermore, the Branch Chief stated that in their opinion, the QASP requirements and report template are only suggestions and that they do not enforce the ACOR reporting requirement. However, the audit team considers the designation letters and QASPs as criteria.

### ***(U) Monthly Reporting Process Improvements***

(U) In April 2023, the Branch Chief formalized improvements to the monthly reporting process by requiring CORs to attach an MFR to their monthly reports detailing contractor performance and any reasons for low fill rates. The contracting officers are required to save both the PowerPoint presentations and MFRs in the contract file to provide an auditable trail. The Branch Chief provided copies of the PowerPoint presentations used from October 2022 through March 2023 that the contracting officers, CORs, and ACORs discussed during their recurring meetings. The PowerPoint presentations summarized the results of monthly COR and ACOR reports, including:

- (U) required minimum fill rate versus actual current fill rate;
- (U) number of linguists in the hiring process, if applicable; and
- (U) any linguist performance issues identified by the COR or ACOR.

(U) The PowerPoint presentations from October 2022 through March 2023 demonstrate consistent use of required reporting elements in the COR and ACOR reports to monitor contractor fill rates. Additionally, the ACC-DTA established a template MFR for the contracting officer to document contractor performance on a monthly basis. The Branch Chief stated that the contracting

(U) officer is required to document in the MFR the contractor performance based on the COR's monthly report and the fill rate for that month. The ACC-DTA also implemented the use of the MFR to capture specific details and to document whether fill rate delays were caused by the Government or the contractor. ACC-DTA officials provided the first set of MFRs completed in March 2023. ACC-DTA implemented the MFR process to hold the contractor accountable through corrective action plans and non-compliance reports, when applicable.

(U) The ACC-DTA identified and implemented procedures to improve the monthly reporting process. Because these changes addressed the issues we identified, we are not making a recommendation related to documenting contractor performance on a monthly basis.

### **(U) ACC-DTA Did Not Complete Annual Evaluations in a Timely Manner Because of a Lack of Guidance**

ACC-DTA contracting officers did not complete annual evaluations in a timely manner for all three task orders in accordance with FAR and DoD guidance. FAR Part 42 requires contracting officers to prepare contractor performance evaluations at least annually and include relevant information that accurately depicts the contractor's performance based on objective facts supported by data. Furthermore, the DoD requires the contracting officer to complete a contractor performance evaluation within 4 months after the end of a performance period.<sup>16</sup> The Branch Chief stated that the Contractor A, B, and C contracting officers did not complete annual evaluations in a timely manner for all three task orders because a 2018 Office of the Under Secretary of Defense for Acquisition and Sustainment memorandum [REDACTED]

[REDACTED], including the DLITE II contract, [REDACTED]

<sup>17</sup> Specifically, the Under Secretary of Defense for Acquisition and Sustainment did not issue guidance designating an alternate system in which to upload annual evaluations. However, an Under Secretary of Defense for Acquisition and Sustainment official stated that contracting officers were still expected to monitor contractor performance in accordance with FAR Part 42, which requires the completion of annual evaluations of contractor performance.

<sup>16</sup> (U) Under Secretary of Defense (Acquisition, Technology, and Logistics) memorandum, "Past Performance Assessment Reporting," January 9, 2009.

(U) A performance period is the time frame starting with the effective date of a contract through the last day of contractor performance and can be extended with additional option periods. The three DLITE task orders we reviewed had performance periods varying from 6 to 12 months.

<sup>17</sup> [REDACTED]

## ***(U) ACC-DTA Did Not Complete Annual Evaluations in a Timely Manner***

(U) ACC-DTA contracting officers did not complete annual evaluations in a timely manner for all three task orders, in accordance with FAR and DoD guidance. Based

*(U) ACC-DTA contracting officers did not complete annual evaluations in a timely manner for all three task orders, in accordance with FAR and DoD guidance.*

on FAR Part 42 and DoD requirements, as of April 2023, Contractor A, B, and C contracting officers should have completed at least one evaluation each year from 2017 through 2022, for at least five evaluations per contractor.

### ***(U) Contractor A***

(U) The Contractor A contracting officer did not complete all five required annual Contractor A evaluations within 4 months after the end of a performance period. The Branch Chief stated that CLIPSO completed an annual evaluation before transferring contract authority in 2018 for the first performance period but did not provide it to the ACC-DTA. The Branch Chief stated that after a period of time, the system automatically archived evaluations, so they were unavailable. Subsequently, the ACC-DTA contracting officer completed the four remaining annual evaluations (for performance periods from 2018 through 2021) from June to August 2022, after we announced this audit and more than 4 months after the performance periods were completed. For example, the contracting officer completed the 2018 evaluation 1,135 days late.

### ***(U) Contractor B***

(U) The Contractor B contracting officer did not complete all five required annual Contractor B evaluations within 4 months after the end of each performance period. Instead, the contracting officer completed all five annual evaluations in June and August 2022, after we announced this audit, with the 2018 evaluation completed 1,443 days late.

### ***(U) Contractor C***

(U) The Contractor C contracting officer did not complete all five required annual Contractor C evaluations within 4 months after the end of each performance period. Instead, the contracting officer completed one evaluation in 2020 and the

(U) remaining evaluations in August 2022 and January 2023, after we announced this audit.<sup>18</sup> For example, the contracting officer completed the 2019 evaluation 869 days late.

***(U) Guidance for an Alternate Evaluations System of Record Was Not Issued, and the ACC-DTA Inherited Disorganized Contract Files Delaying Evaluation Completion***

█ The Branch Chief stated that the Contractor A, B, and C contracting officers did not complete annual evaluations for all three task orders in a timely manner, because a 2018 Office of the Under Secretary of Defense for Acquisition and Sustainment memorandum █

█ Specifically, the Under Secretary of Defense for Acquisition and Sustainment did not issue guidance █

█ The DoD traditionally uses the Contractor Performance Assessment Reporting System to complete annual evaluations for DoD contractors within 4 months after the end of a performance period. In addition, according to the Branch Chief, when INSCOM transferred contract authority to the ACC-DTA in 2018 for all INSCOM contracts, the ACC-DTA inherited disorganized contract files, contributing to delays in completing required evaluations until 2022.

█ In November 2018, the Office of the Under Secretary of Defense for Acquisition and Sustainment issued a memorandum that █

█, including CLIPSO, as part of INSCOM. According to the ACC-DTA Linguist Support Services Branch Chief, the memorandum █

*(U) Contracting officers are still expected to monitor contractor performance in accordance with FAR Part 42, which requires the completion of annual evaluations of contractor performance.*

█ An Under Secretary of Defense for Acquisition and Sustainment official stated that contracting officers are still expected to monitor contractor performance in accordance with FAR Part 42, which requires the completion of annual evaluations of contractor performance. The Branch Chief stated they

<sup>18</sup> █ The Branch Chief stated that when INSCOM transferred contract authority to the ACC-DTA in 2018, and before the 2018 Under Secretary of Defense for Acquisition and Sustainment memorandum was issued, they completed an annual evaluation for Contractor C. The Branch Chief further stated that they completed an annual evaluation in 2020 for Contractor C, and not Contractors A or B, because the Contractor C task order had already been loaded into the DoD's annual evaluation system and therefore, required an evaluation in that system. The 2018 memorandum later █



████ informed ACC-DTA leadership multiple times that a contractor performance evaluation system for the classified network needed to be developed and that ACC-DTA waited for additional guidance on contractor performance evaluations from the Defense Pricing and Contracting office, but the Defense Pricing and Contracting office did not issue any additional guidance.<sup>19</sup>

(U) In February 2020, the ACC-DTA developed an internal SharePoint site for a system they called “Contractor Review Information” (CRI) to complete and store annual performance evaluations for intelligence-related contracts. ACC-DTA completed the CRI SharePoint site in April 2021 and issued the CRI User Guide in June 2021. The CRI form documents contractor performance evaluations and covers performance areas such as quality, scheduling, cost control, management, and regulatory compliance. The CRI User Guide provides instruction on how to use the form but did not include a requirement to document performance evaluations in a set number of days.<sup>20</sup>

(U) In addition to implementing CRI, the Branch Chief stated that in January 2021 they began using PowerPoint presentations during recurring meetings to track outstanding tasks such as contractor performance evaluations. For example, the Branch Chief provided the March 2023 presentation which showed a section on each slide for each task order that indicates if the annual evaluation has been completed. The Branch Chief further stated that they had to complete 70 annual evaluations, in conjunction with managing 20 active task orders (including the 3 that are part of this audit), multiple competitive source selections, as well as post-award competitive sources, all of which contributed to the delay in completing the annual evaluations, from when the CRI site was implemented in June 2021 to when the first evaluation was completed in April 2022.

(U) Additionally, the Branch Chief stated that when contract authority transferred from CLIPSO to the ACC-DTA in 2018, the ACC-DTA inherited disorganized contract files, which prevented the ACC-DTA from thoroughly evaluating whether contracting officers, CORs, and ACORs had fully documented their contract oversight activities. In addition, the Branch Chief stated that after INSCOM transferred contract authority, the Branch experienced high turnover in 2019 and 2020, which compounded the difficulty of sorting through the disorganized files. The Branch Chief stated that they established processes in late 2020 to track contract metrics, including completing annual performance evaluations. However, as of June 2022, more than 1 year later, the contracting officers still had not completed all required CRI documentation. The Branch Chief also stated that contracting officers had to search through the inherited files, which lengthened completion time, and coordinate with CLIPSO to gather information for the CRI forms.

<sup>19</sup> (U) The Defense Pricing and Contracting office is an organization under the Office of the Under Secretary of Defense for Acquisition and Sustainment. The Defense Pricing and Contracting office issues DoD contracting policy and guidance.

<sup>20</sup> (U) The ACC-DTA issued the CRI User Guide and saved it on its internal SharePoint site for contracting officers to access.



### **(U) Contractor Performance Evaluation Process Improvements**

(U) During our audit, the Branch Chief updated the CRI User Guide to require contracting officers to complete the annual evaluations within 4 months after the end of the performance period. The Branch Chief provided the updated CRI User Guide and a screenshot showing a link to the Guide on the ACC-DTA SharePoint site, which is available to all Branch staff.

(U) Because the ACC-DTA formalized and implemented these processes during our audit to ensure completion of annual evaluations in a timely manner, we are not making a recommendation related to the annual contractor performance evaluation weaknesses.

### **(U) Inconsistently Reporting Contractor Performance to the Contracting Officer May Lead to Gaps in Oversight**

(U) As a result of incomplete or partially completed monthly ACOR reports and subsequent COR reports, there is an increased risk that the COR and contracting officer may be unaware of potential issues and challenges regarding the task orders at the military end user level. ACORs are the eyes and ears of Government oversight closest to the requirements; therefore, reporting from the COR and ACOR is imperative to ensuring support to military end users. For example, during our site visits, 11 out of 25 military end users we interviewed stated that they either did not have enough linguists or the correct language support. We could not verify that the linguists the military end users stated that they needed were actually required by the technical exhibit at that time. We also did not identify where these challenges had been documented as being communicated to the ACOR or COR, or documented in a report from March 2021 through February 2022. If the ACC-DTA and CLIPSO do not ensure adequate monthly reporting from the ACOR and COR, there is a risk that deficiencies will not be captured in contract documentation.

(U) Additionally, because of untimely completion of annual evaluations, the Contractor A contracting officer and Branch Chief completed two contractor performance evaluations for administrative purposes only to document an evaluation,

but the evaluations did not include any performance assessment information.

The two evaluations completed for the 2018 and 2019 performance periods stated, "The contracting officer could not report adequate performance or ratings

*(U) Because of untimely completion of annual evaluations ... the evaluations did not include any performance assessment information.*

(U) information due to a lack of personal knowledge or observation during those years.” Additionally, the original CLIPSO COR responsible for evaluating the contractor’s performance in 2018 and 2019 was no longer available for input to the contracting officer. In addition, Contractor A argued that their performance on DLITE II had been “Very Good” rather than “Satisfactory.” However, ACC-DTA maintained the “Satisfactory” rating because it did not have “evidence that the contractor did not meet or exceeded the required contractual obligations.”

(U) Furthermore, because of untimely completion of annual evaluations for Contractors A, B, and C, there is a lack of past performance data that could impact the process for determining future awards. Although the current task orders transitioned to the new USCENCOM II task order on July 29, 2023, these three contractors may still bid on future contracts for language or other services. Without detailed past performance evaluations, evaluation boards may not have adequate information to judge past performance. Alternatively, without adequate contractor evaluations, Government officials may not be aware of contractors who demonstrated exceptional performance, which also influences selection decisions.

## **(U) Consolidated DLITE Task Order for USCENCOM**

(U) In January 2023, the ACC-DTA awarded a time-and-materials task order to consolidate all USCENCOM language service requirements under one task order. The USCENCOM II task order has a 1-year base period with 4 option years available. The ACC-DTA provided Government Format Pricing Model showed that the USCENCOM II task order has a \$1.4 billion ceiling. Under a time-and-materials task order, the contractor is paid a set hourly rate for the number of labor hours performed. The hourly rate includes wages, indirect costs, general administrative expenses, and contractor profit.

(U) According to the FAR, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency.<sup>21</sup> As a result, Government oversight of contractor performance is essential to give reasonable assurance that efficient methods and effective cost controls are being used to prevent inefficiency or waste.

<sup>21</sup> (U) FAR Part 16, “Types of Contracts,” Subpart 16.6, “Time-and-Materials, Labor-Hour, and Letter Contracts,” Section 16.601, “Time-and-materials contracts.”

## (U) Finding B

### (U) CLIPSO Did Not Have a Consistent Process to Address and Document Linguists' Alleged Security Incidents

(U) The CLIPSO Director and CORs, also known as oversight officials, did not properly address, in a timely manner, and fully document alleged security incidents for three Contractor C linguists.

- [REDACTED] Two linguists allegedly [REDACTED]  
[REDACTED]
- [REDACTED] One linguist allegedly [REDACTED]  
[REDACTED]

(U) CLIPSO oversight officials did not properly address alleged security incidents because CLIPSO oversight officials had not established a process to ensure consistent reporting, reviewing, and documenting of the resolution of alleged security incidents involving contracted linguists, in a timely manner.

[REDACTED] As a result of process weaknesses, CLIPSO oversight officials did not fully document in the contract file the steps taken to address the incidents and decisions they made to keep or remove linguists with alleged security incidents and were not aware of one alleged security incident. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] Documenting details of the alleged security incidents and decisions made would also ensure new CORs and ACORs are informed of previous security incidents.

### (U) CLIPSO Oversight Officials Did Not Properly Address Alleged Security Incidents in a Timely Manner

(U) CLIPSO oversight officials did not properly address, in a timely manner, and fully document alleged security incidents from three Contractor C linguists. During our site visits to Kuwait and Qatar from March through April 2022, the ACOR provided us three MFRs that documented alleged security incidents regarding three linguists actively working on the Contractor C task order. The ACOR stated that they did not have authority to remove the linguists from the contract; however, the Contractor C task order authorized the CLIPSO Director to remove linguists perceived as a threat to personnel or mission. In June 2022, Contractor C, at CLIPSO's request, removed one of the linguists and as of August 2023, the other two linguists continued to work on the task order with security clearances.

**(U) Linguist #1**

On April 21, 2021, a military end user documented in an MFR that a linguist allegedly

Additionally, the military end user concluded that the linguist

(U) The ACOR provided us with the MFR on March 24, 2022. However, the COR stated that they first became aware of the MFR and the alleged security incident when we provided the COR the MFR on May 6, 2022. There was no documentation

*(U) The COR stated that they first became aware of the MFR and the alleged security incident when we provided the COR the MFR on May 6, 2022.*

to indicate that the ACOR conducted a review of the alleged security incident or submitted the MFR to the COR when the incident was first reported in April 2021. Furthermore, after we notified CLIPSO of the MFR, the COR did

not inform the contracting officer of the alleged incident or provide the MFR to the contracting officer. After we notified the COR of the MFR, the ACOR, contractor, and current military end user personnel met to discuss the alleged security incident. On August 24, 2022, the COR informed us that the linguist was reassigned to a military end user in Iraq who stated that they had no issues with the linguist.

CLIPSO later provided us an October 8, 2022 email from a military end user in response to CLIPSO's inquiries about whether a counterintelligence investigation had been conducted at the time the incident was initially reported. The military end user stated that an investigation was not conducted and that they had many issues while directly working with Linguist #1 from 2020 to 2021. This military end user, different from the end user that wrote the original MFR, stated that they were concerned that Linguist #1



Despite the two reported incidents and a lack of counterintelligence investigation, according to the CLIPSO Director, the counterintelligence and security process worked as designed. In addition, CLIPSO did not provide any documentation to support any review by the ACOR or COR of any allegations.

### **(U) Linguist #2**

On October 8, 2020, the special agent in charge of the U.S. Army Counterintelligence Kuwait Resident Office sent an MFR to the senior ACOR and linguist manager. The special agent stated in the MFR that a linguist

Specifically, the special agent stated that in April 2020, the linguist

Additionally, the special agent documented in the MFR the linguist's

The special agent stated in the MFR that

The special agent stated in the MFR that

The CLIPSO Director stated that the COR received the MFR on October 26, 2020, but did not provide documentation to support they received the MFR, such as an email. The CLIPSO Director further stated that the Army Counterintelligence Unit completed a limited investigation due to inability to corroborate allegations but again, did not provide supporting documentation.

In November 2021, the

CAS documented that it could not corroborate the special agent's allegations, and therefore, took no additional action. The CLIPSO Deputy Director stated that after reviewing the results of the CAS investigation, they decided not to direct the contractor to remove the linguist from the task order; however, CLIPSO oversight officials did not document their decision in the contract file.

*(U) The Army Counterintelligence Unit completed a limited investigation due to inability to corroborate allegations but again, did not provide supporting documentation.*

(U) The CLIPSO Director and COR did not inform the contracting officer of the alleged incident or provide the MFR to the contracting officer. On June 1, 2022, the same day we met with the CLIPSO Director, Deputy Director, and COR regarding the allegations against the linguist, the COR emailed the contractor and directed the contractor to remove the linguist due to the security allegations documented in the October 8, 2020 MFR. On June 13, 2022, the contractor removed the linguist from the contract.

While CLIPSO did review the allegations against Linguist #2, there was no evidence that the special agent or CLIPSO attempted to [REDACTED] [REDACTED] worked on the DLITE II contract, or whether a review of the acquaintance's actions was warranted.

### **(U) Linguist #3**

On August 10, 2018, a military end user sent an MFR to the ACOR and multiple Contractor C officials, stating [REDACTED]

The CLIPSO Director later stated that the COR received the MFR on August 12, 2018, but could not provide us the supporting documentation, such as an email. The CLIPSO Director stated that on May 11, 2022, almost 4 years after the incident, the COR requested that the military end user's counterintelligence team review the allegations and provide an update through the ACOR. The COR stated that they spoke with the military end user to discuss the military end user's counterintelligence team's investigation and requested the findings of the investigation. In June 2022, the CLIPSO Deputy Director stated that they thought a review was conducted at the time of the alleged incident that determined [REDACTED] [REDACTED] had authorized access to the installation. The CLIPSO Deputy Director further stated that the linguist had only [REDACTED]

*(U) Almost 4 years after the incident, the COR requested that the military end user's counterintelligence team review the allegations and provide an update through the ACOR.*

incident, the COR requested that the military end user's counterintelligence team review the allegations and provide an update through the ACOR. The COR stated that they spoke with the military end user to discuss the military end user's counterintelligence team's investigation

[REDACTED] The CLIPSO Deputy Director characterized their summary of the incident as a possibility but could not definitively say that occurred. The CLIPSO Deputy Director stated that based on the CLIPSO Director's review, the linguist remained on the contract. CLIPSO oversight officials did not document in the contract file their review and associated conclusions.

[REDACTED] On October 8, 2022, the military end user's counterintelligence official stated that the allegations in the MFR did not meet the requirement for a counterintelligence investigation but did not provide further detail as to why. The contractor subsequently reassigned the linguist to a different military end user and location, who stated that they had no issues with the linguist. However, the CLIPSO Director and COR did not inform the contracting officer of the allegation or their decision. [REDACTED]

### **(U) CLIPSO Did Not Establish Roles, Responsibilities, and Processes to Consistently Report, Review, Document, and Remove Linguists**

(U) The military end users complied with CLIPSO guidance by documenting each of the three linguists' alleged security incidents in an MFR and informing the ACOR. However, CLIPSO oversight officials did not properly address alleged security incidents because CLIPSO officials had not established clear roles and responsibilities or a process to ensure consistent reporting, reviewing, and documenting of the resolution of security incidents involving contracted linguists, in a timely manner.

(U) CLIPSO officials have not clearly defined the ACOR, COR, and Director's roles and responsibilities for handling alleged security incidents of linguists. According to the CLIPSO Director, the ACOR is responsible for notifying the COR of all alleged linguist security incidents and assisting in gathering information to substantiate the allegations. The CLIPSO Deputy Director and the Contractor C COR stated that the COR is responsible for reviewing alleged security incidents to learn about the issue from all parties involved. However, none of these steps are documented in CLIPSO guidance. In addition, CLIPSO did not provide any documentation to support that the COR reviewed any of the three alleged security incidents to understand the facts.

*(U) CLIPSO officials have not clearly defined the ACOR, COR, and Director's roles and responsibilities for handling alleged security incidents of linguists.*

(U) In addition to specific roles and responsibilities, CLIPSO officials had not documented a process to ensure timely, consistent oversight of alleged security incidents, including:

- (U) requiring the ACOR to report to the COR within a defined time frame any MFRs identifying alleged security incidents involving contracted linguists, and include the MFRs in the COR's contract file;
- (U) requiring the COR to report to the contracting officer any MFRs identifying alleged security incidents;
- (U) detailing the step-by-step procedures for CLIPSO to review alleged security incidents and, if appropriate, remove a linguist from the contract; and
- (U) documenting within the contract file the results of the review, and the decision to either retain or direct the contractor to remove the linguist.

(U) The COR received the MFRs for linguists #2 and #3; however, CLIPSO officials stated that at the time the Linguist #1 MFR was written, the COR was transitioning and CLIPSO does not know why the MFR was not received from the ACOR. As a result, the COR did not conduct a review of the allegations against Linguist #1. Additionally, although the COR received the other two MFRs, the COR did not follow a consistent, documented process when reviewing and reporting each alleged incident. For example, for Linguist #2, the COR coordinated with the CAS; while for Linguist #3, the COR did not coordinate with the CAS but instead coordinated with the military end user, who conducted a counterintelligence review of the incident. The COR also did not provide any of the three MFRs to the contracting officer.

(U) On May 6 and June 1, 2022, we discussed the three linguists with CLIPSO officials including the Director, Deputy Director, previous COR, and current COR. CLIPSO officials, as the owners of the process, could not provide a consistent explanation of the process for reporting, reviewing, documenting, and if appropriate, removing linguists for misconduct or security concerns. In July 2023, the CLIPSO Director provided the audit team documentation detailing a chronology of events for each of the three linguists that included several supporting documents, such as emails. For example, the CLIPSO Director provided the following supporting documentation related to Linguist #1:

- (U) an email with the contractor discussing the reassignment of Linguist #1;
- (U) the contractor's attempt to coordinate a counterintelligence investigation; and
- (U) an email chain from an end user stating a counterintelligence investigation was not conducted.

(U) For Linguist #2, the CLIPSO Director provided the original MFR and the email chain releasing Linguist #2 from the contract. Furthermore, for Linguist #3, the CLIPSO Director provided the audit team an email chain with a military end user, stating that a counterintelligence investigation was not warranted. In the same email chain related to Linguist #3, the ACOR sought to understand the counterintelligence investigation process.

(U) CLIPSO did not have command-level guidance clearly defining the ACOR, COR, and Director's roles and responsibilities for handling alleged security incidents of linguists or detailing a process to review alleged security incidents of contract linguists. Therefore, we recommend the CLIPSO Director establish and document roles and responsibilities and the process for reviewing alleged linguist security concerns and maintaining in the contract file all supporting documentation, including the decision to either retain or direct the contractor to remove linguists on the task order.

**(U) Actions Taken By CLIPSO to Improve Linguist Security Incident Reporting Process**

During the audit, CLIPSO took actions to establish command-level guidance detailing the ACOR's responsibility to report alleged security incidents to the COR in a timely manner. Specifically, the CLIPSO oversight officials issued the CLIPSO

Contract Linguist Handbook.

The handbook states that the [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

*(U) CLIPSO took actions to establish command-level guidance detailing the ACOR's responsibility to report alleged security incidents to the COR in a timely manner.*

Because CLIPSO formalized and implemented this step of the process

to ensure notification of alleged security incidents in a timely manner, we are not making a recommendation related to the ACOR reporting alleged security incidents to the COR as part of the overall reporting and reviewing process.



## (U) Weaknesses in Security Incident Processes Put Military End Users and Classified Information at Increased Risk

As a result of process weaknesses, CLIPSO oversight officials stated they were not aware of one of the incidents until we brought it to their attention in May 2022. In addition, not having clearly defined processes for the handling of

*(U) The lack of immediate action in response to Linguist #2 allegations resulted in no review or investigation of the linguist's acquaintance.*

allegations resulted in significant delays before actions were taken. For example, for Linguist #3, it took nearly 4 years for the COR to request the military end user's counterintelligence team to review the allegations. Furthermore, the lack of immediate action in response to Linguist #2 allegations resulted in no review or investigation of the linguist's acquaintance. Specifically,

In October 2022, CLIPSO officials stated that CLIPSO did not have adequate information available to identify the acquaintance of Linguist #2; therefore, they could not make any determination whether the acquaintance or is still working on the task order. In addition, allowing linguists who have allegedly committed security incidents to continue working on the task order could endanger U.S. military, Coalition, and civilian personnel and

For example, the allegations against Linguists #1 and #3 consisted of

To protect military and civilian personnel, CLIPSO officials should review each alleged security incident in a timely manner to determine if it warrants removing the linguist from the contract. Documenting details of the alleged security incidents, the results of the review, and decisions made would also ensure new CORs and ACORs are informed of previous security incidents.

## **(U) Recommendations, Management Comments, and Our Response**

### **(U) Recommendation B.1**

[REDACTED]

### **(U) Contract Linguist and Intelligence Program Support Office Comments**

[REDACTED]

22

### **(U) Our Response**

(U) The Director’s comments addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when CLIPSO provides us with the results of their review and documentation of their conclusions.

### **(U) Assistant Secretary of the Army for Acquisition, Logistics, and Technology**

(U) Although not required to comment, the Deputy Assistant Secretary of the Army (Procurement) agreed with the recommendation, stating that CLIPSO has already taken actions to address the recommendation.

<sup>22</sup> (U) The Defense Information System for Security is the DoD system of record that documents personnel security, suitability, and credentialing for DoD military personnel, civilians, and contractors. Security officers, adjudicators, and components use the Defense Information System for Security to request, record, document, and identify personnel security actions.

## ***(U) Recommendation B.2***

**(U) We recommend the Contract Linguist and Intelligence Program Support Office Director establish and document roles and responsibilities and the process for reviewing, reporting, and documenting alleged contract linguist security incidents, including procedures for the following steps.**

- a. (U) The contracting officer's representative will report all alleged security incidents to the contracting officer.**
- b. (U) The contracting officer's representative will ensure a review of the alleged security incident is initiated within a defined time frame after notification.**
- c. (U) The contracting officer's representative will maintain in the contract file the decision to either retain or direct the contractor to remove the linguist on the task order, and include all supporting documentation.**

## ***(U) Contract Linguist and Intelligence Program Support Office Comments***

(U) The INSCOM Director of Support, responding for the CLIPSO Director, agreed with the recommendation, stating that CLIPSO updated the CLIPSO Contract Linguist Handbook in July 2023, including roles and responsibilities for reviewing, reporting, and documenting linguist-related issues, including alleged security incidents. The Director further stated that all incidents rising to the level of an INSCOM Commander's Critical Information Requirement are reported to the ACC-DTA contracting officer. The COR addresses all alleged incidents that do not meet the Commander's Critical Information Requirement threshold. The Director stated that recurring meetings are attended by CORs and other contracting officials from the ACC-DTA Linguist Branch and that alleged security incidents are reviewed by the COR upon receipt to ensure timely consideration. Lastly, the Director stated that in the event a linguist no longer meets PWS specifications to perform on contract, the vendor is notified, and the vendor's decision is documented. Upon receipt, the COR maintains all incident documentation, alleged or otherwise, and any related determinations or findings in the contract file.

## ***(U) Our Response***

(U) The Director's comments addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when CLIPSO provides us with the Contract Linguist Handbook and we verify that all elements of the recommendation, as described in CLIPSO's comments, are included.

***(U) Assistant Secretary of the Army for Acquisition, Logistics,  
and Technology***

(U) Although not required to comment, the Deputy Assistant Secretary of the Army (Procurement) agreed with the recommendation, stating that CLIPSO has already taken actions to address the recommendation.

# (U) Appendix A

## (U) Scope and Methodology

(U) We conducted this performance audit from February 2022 through June 2023 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) Selection of Task Orders

(U) To determine whether the Army provided effective oversight of the DLITE II contract, we reviewed three out of the five task orders with linguists located in the USCENTCOM area of responsibility (see Table 3). Additionally, we reviewed these three DLITE II task orders because they had performance periods that were beyond February 2022.

(U) Table 3. Scope Selection of Task Orders

(U) Contractor	Place of Performance	Performance Period	Included in Scope
Contractor 1	Kingdom of Saudi Arabia, Kuwait, Qatar, United Arab Emirates, Jordan, Iraq, Syria, Bahrain, Oman, Tampa FL	Ended April 2020	No
Contractor 2	Kingdom of Saudi Arabia, Kuwait, Qatar, United Arab Emirates, Jordan, Iraq, Syria, Bahrain, Oman, Tampa FL	Ended December 2019	No
Contractor A	Kingdom of Saudi Arabia, Kuwait, Qatar, United Arab Emirates, Jordan, Bahrain, Egypt, Tampa FL	June 2017–Present	Yes
Contractor B	Afghanistan, Qatar	March 2017–Present	Yes
Contractor C	Kingdom of Saudi Arabia, Kuwait, Qatar, United Arab Emirates, Jordan, Iraq, Syria	June 2017–Present	Yes

(U) Note: Performance period information is accurate as of June 2023.

(U) Source: The DoD OIG.



## ***(U) Review of Contract Documentation***

(U) For each of the three task orders, we obtained the base task order, PWS', lists of required linguists, COR and ACOR designation letters, QASPs, COR and ACOR monthly reports, and annual evaluations. We reviewed this documentation to identify contract oversight procedures and determine whether the procedures were effective to address deficiencies in a timely manner.

## ***(U) Criteria***

(U) We evaluated oversight procedures according to the following criteria.

- (U) FAR Part 1, "Federal Acquisition Regulations System"
- (U) FAR Part 2, "Definitions of Words and Terms"
- (U) FAR Part 4, "Administrative and Information Matters"
- (U) FAR Part 16, "Types of Contracts"
- (U) FAR Part 37, "Service Contracting"
- (U) FAR Part 42, "Contract Administration and Audit Services"
- (U) FAR Part 46, "Quality Assurance"
- (U) Defense FAR Supplement Procedures, Guidance, and Information, Part 201, "Federal Acquisition Regulations System"
- (U) Under Secretary of Defense (Acquisition, Technology, and Logistics) memorandum, "Past Performance Assessment Reporting," January 9, 2009
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- (U) Department of the Army, "Contract Linguist Screening and Vetting Policy," March 29, 2019
- (U) CLIPSO Contract Linguist Handbook, March 2022

## ***(U) Site Visits and Interviews***

(U) We conducted site visits to Qatar and Kuwait from March to April 2022 to interview forward deployed personnel including the senior ACOR, ACORs, and military end users to determine their processes for managing the linguists and whether the linguists met the needs of the military end users they were employed to support. We interviewed military end users and ACORs from Kuwait, Qatar, Iraq, and Syria. We also conducted interviews with contract oversight personnel in the United States including the CLIPSO Director, Deputy Director, CORs, and the ACC-DTA Linguist Support Services Branch Chief and contracting officers to determine their roles, responsibilities, and processes for overseeing the three task orders. See Table 4 for an overview of the interviews we conducted during our audit fieldwork.

(U) Table 4. Overview of Audit Client Interviews

(U)	Interviewees	Work Location
	CLIPSO leadership, CORs, and ACORs	Virginia, Kuwait, Qatar, Iraq
	ACC-DTA Linguist Support Services Branch Chief and contracting officers	Michigan
	U.S. Army Central military end users	Kuwait, Qatar
	U.S. Special Operations Command military end users	Qatar
	Area Support Group–Kuwait military end users	Kuwait
	Combined Joint Task Force–Operation Inherent Resolve military end users	Kuwait, Iraq
	Special Operations Joint Task Force–Levant military end users	Syria
		(U)

(U) Source: The DoD OIG.

**(U) Analysis of Fill Rate**

(U) We determined whether, and to what extent, ACC-DTA and CLIPSO officials provided effective oversight of contractor performance to ensure adequate linguist staffing. We reviewed and compared the number of linguists required to the number of linguists listed as working on the daily status report for the last day of each month from March 2021 through February 2022. We determined if the fill rate combined with personnel in the onboarding or in the pipeline process was at or above 98 percent. We determined that 1 year of comparative analysis would be sufficient to determine the contractors’ ability to meet fill rate requirements and generate interview questions for CLIPSO personnel on how they ensured contractor compliance. The sampling described was nonstatistical, and the results of the sample testing could not be projected to the intended population.

**(U) Analysis of Monthly Reports and Annual Evaluations**

(U) We determined whether, and to what extent, CLIPSO CORs and ACORs completed and submitted required monthly contractor reports. We requested monthly reports from March 2021 to February 2022 and reviewed the content for completion in accordance with the designation letter and QASP requirements. We also determined whether, and to what extent, ACC-DTA contracting officers completed accurate annual evaluations in a timely manner. We requested all annual performance evaluations for the life of each task order and determined whether reports were completed on time and included substantive information to determine contractor performance in accordance with FAR and DoD requirements.

### ***(U) Review of Alleged Linguist Security Incidents***

(U) We determined whether CLIPSO had a consistent process to address, keep, or review linguists, and document alleged linguist security incidents. We reviewed five memorandums of record from military end users from August 2018, October 2020, and April 2021, which documented the alleged security incidents; and interviewed CLIPSO personnel to determine how they decided to keep or remove linguists with alleged security incidents.

### **(U) Internal Control Assessment and Compliance**

(U) We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed the control components and underlying principles related to the ACC-DTA and CLIPSO's oversight and staffing of three task orders under the DLITE II contract. Specifically, we assessed the control environment within the processes for contract oversight to determine whether the contracting officers, CORs, and ACORS exercised oversight responsibility. The control environment provides the foundation for an internal control system and includes exercising oversight responsibility. We determined that the CORs and ACORS did not complete all required monthly contractor reports and the contracting officers did not complete annual evaluations.

(U) Furthermore, we assessed monitoring within the processes for contract oversight to determine if the ACC-DTA and CLIPSO performed monitoring activities and remediated deficiencies. Internal control monitoring includes establishing and operating monitoring activities to oversee the internal control system and evaluate the results. We determined that CLIPSO did not have a consistent process to resolve and document alleged linguist security incidents. Specifically, CLIPSO oversight officials did not establish a process to ensure consistent reporting, reviewing, and documenting of the resolution of security incidents involving contracted linguists in a timely manner. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

### **(U) Use of Computer-Processed Data**

(U) We did not use computer-processed data to perform this audit.

## (U) Prior Coverage

(U) During the last 5 years, the DoD OIG issued one report discussing DoD contracted linguists. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/reports.html/>.

(U) Report No. DODIG-2019-098, "Evaluation of Theater Linguist Support for Operation Freedom's Sentinel," June 21, 2019. This report is classified.



## (U) Appendix B

### (U) ACOR Reports Analysis

(U) We analyzed ACOR reports for Contractors A, B, and C from March 2021 through February 2022. We compared the reporting requirements from the QASP against the contents of each month's report. Table 5 provides the analysis for the Contractor A and C ACOR reports. Table 6 provides the analysis for the Contractor B ACOR reports.

(U) Table 5. ACOR Reports for Contractors A and C, March 2021 Through February 2022

(U)		Contractors A and C ACOR Reporting Requirements						
		Significant Events	Random Inspections of Linguists	Contract Oversight Activities	Discrepancy Notices	Unresolved Issues	Schedule of Events	Monitoring Forms
March 2021	Contractor A	✓	✓	✓	✓	✓	✓	✗
	Contractor C	Report not completed						
April 2021	Contractor A	✓	✓	✓	✓	✓	✓	✗
	Contractor C	✓	✓	✓	✗	✓	✓	✗
May 2021	Contractor A	✓	✓	✓	✓	✓	✓	✗
	Contractor C	✓	✓	✓	✓	✗	✓	✗
June 2021	Contractor A	✓	✓	✗	✓	✓	✓	✗
	Contractor C	✓	✓	✓	✓	✗	✓	✗
July 2021	Contractor A	Report not completed						
	Contractor C	Report not completed						
August 2021	Contractor A	✓	✓	✗	✓	✓	✓	✗
	Contractor C	Report not completed						

(U)

(U) Table 5. ACOR Reports for Contractors A and C, March 2021 Through February 2022 (cont'd)

(U)		Contractors A and C ACOR Reporting Requirements						
		Significant Events	Random Inspections of Linguists	Contract Oversight Activities	Discrepancy Notices	Unresolved Issues	Schedule of Events	Monitoring Forms
September 2021	Contractor A	✓	✓	✗	✓	✓	✓	✗
	Contractor C	Report not completed						
October 2021	Contractor A	Report not completed						
	Contractor C	Report not completed						
November 2021	Contractor A	✓	✓	✗	✓	✓	✗	✗
	Contractor C	✓	✓	✗	✓	✓	✓	✗
December 2021	Contractor A	✓	✓	✗	✓	✓	✓	✗
	Contractor C	✓	✓	✗	✓	✓	✗	✗
January 2022	Contractor A	Report not completed						
	Contractor C	✓	✓	✗	✓	✓	✗	✗
February 2022	Contractor A	Report not completed						
	Contractor C	✓	✓	✗	✓	✓	✓	✗

(U) ✓ Indicates element included. ✗ Indicates element not included.

(U) Source: The DoD OIG.

(U) Table 6. ACOR Reports for Contractor B, March 2021 Through February 2022

(U)	Contractor B ACOR Reporting Requirements								
	Significant Events	Random Inspections of Linguists	Assessment of Linguist Performance	Information About End Users	Information About Contractor	Complaints Regarding Linguists	Discrepancy Notices	Unresolved Issues	Schedule of Events
March 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
April 2021	Report not completed								
May 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
June 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
July 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
August 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
September 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
October 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
November 2021	✓	✓	✓	✓	✓	✓	✓	✓	✓
December 2021	✓	✓	✓	✓	✓	✓	✓	✗	✗
January 2022	✓	✓	✓	✓	✓	✓	✓	✗	✗
February 2022	✓	✓	✓	✓	✓	✓	✓	✓	✗

(U)

(U) ✓ Indicates element included. ✗ Indicates element not included.

(U) Source: The DoD OIG.

## (U) Management Comments

### (U) Contract Linguist and Intelligence Program Support Office



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY INTELLIGENCE AND SECURITY COMMAND  
8825 BEULAH STREET  
FORT BELVOIR, VA 22060-5246

IAOP- CLP (1100A)

MEMORANDUM FOR Office of the Inspector General, Department of Defense, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: (U) Official Management Response to the Draft Report on the Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract (Project D2022-D000RJ-0104.000)

1. References:

a. (U) Department of Defense Office of the Inspector General, Draft Report on the Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract (Project D2022-D000RJ-0104.000), 18 October 2023

b. (U) Department of Defense Inspector General Memorandum Subject: Research for Future Audits Related to DoD Sustainment and Logistics Operations (Project No. D2022-D000AH-0003.000), 1 October 2021

2. (U) This memorandum serves as the U.S. Army Intelligence and Security Command (INSCOM) response to the Department of Defense Office of the Inspector General, Draft Report on the Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract (Project D2022-D000RJ-0104.000), dated 18 October 2023.

3. (U) INSCOM appreciates the work performed by the DoD IG Audit team to identify and address challenges highlighted during the audit of Army oversight of the DoD Language Interpretation and Translation Enterprise II (DLITE II) contract. INSCOM manages the DLITE II contract on behalf of the Department of the Army G2 serving as executive agent for foreign language contracts. The Contract Linguist and Intelligence Program Support Officer (CLIPSO) currently manages approximately 2,000 global requirements in six geographic Combatant Commands and across the Intelligence Community and Interagency. The delivery of these services is both dynamic and complex with contract linguists speaking 97 languages and dialects and working in 45 countries. CLIPSO administers twenty-three (23) DLITE task orders with a combined value of \$3.1B.



## (U) Contract Linguist and Intelligence Program Support Office (cont'd)

IAOP-CLP (1100A)

SUBJECT: (U) Official Management Response to the Draft Report on the Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract (Project D2022-D000RJ-0104.000IAOP-CLP (600A)

4. (U) INSCOM reviewed the conclusions and recommendations contained in reference (a) and appreciates the opportunity to respond and provide clarifying context and details. While working collaboratively with the DoD IG Audit team, INSCOM provided written comments to the draft report on multiple occasions. The final DOD-IG Draft report issued two recommendations to INSCOM. The official response to each recommendation is detailed below.

5. [REDACTED]

6. [REDACTED]

7. (U) DOD-IG Recommendation 2. We recommend the Contract Linguist and Intelligence Program Support Office Director establish and document roles and responsibilities. In addition, assess the process for reviewing, reporting, and documenting alleged contract linguist security incidents, including procedures for the following steps.

a. (U) The contracting officer's representative will report all alleged security incidents to the contracting officer.

b. (U) The contracting officer's representative will ensure a review of the alleged security incident is initiated within a defined time frame after notification.

c. (U) The contracting officer's representative will maintain in the contract file the decision to either retain or direct the contractor to remove the linguist on the task order and include all supporting documentation.

8. (U) INSCOM Response. INSCOM concurs with comment to Recommendation 2. CLIPSO updated the CLIPSO Contract Linguist Handbook in July 2023, including roles and responsibilities for reviewing, reporting, and documenting linguist related issues, including alleged security incidents.

a. (U) All incidents rising to the level of an INSCOM Commanders Critical Information Requirement (CCIR) or a violation of DLITE's contract scope are reported to the cognizant Contracting Officer at Army Contracting Command – Detroit Arsenal (AGC–

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## (U) Contract Linguist and Intelligence Program Support Office (cont'd)

IAOP-CLP (1100A)

SUBJECT: (U) Official Management Response to the Draft Report on the Audit of Army Oversight of the DoD Language Interpretation and Translation Enterprise II Contract (Project D2022-D000RJ-0104.000IAOP-CLP (600A)

DTA). Alleged incidents that do not meet CCIR threshold or a violation of contract scope are addressed by the contracting officer's representative (COR).

b. (U) Alternate CORs (ACORs) will communicate any contract and security related issues back through the primary COR at the earliest opportunity and/or during scheduled battle rhythm events. INSCOM scheduled battle rhythm events are attended by CORs and Contracting Officials from ACC-DTA Linguist Branch. Alleged security incidents are reviewed by the COR upon receipt to ensure timely consideration.

c. (U) In the event a linguist no longer meets PWS specifications to perform on contract, the vendor is notified, and the vendor's decision documented. Upon receipt, the COR maintains all incident documentation, alleged or otherwise, and any related determinations or findings in the contract file.

9. (U) In addition to the responses above, INSCOM recommends the DOD IG initiate future audits in coordination with the headquarters to ensure proper staffing and accountability. INSCOM HQ best serves as the respondent having purview over all functions of the command.

10. (U) The point of contact for this action is Edward L. DeLissio at [REDACTED] or e-mail at [REDACTED].

[REDACTED]

DAVID T. KIM  
SES II  
Director of Support

## (U) Assistant Secretary of the Army (Acquisition, Logistics, and Technology)



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY  
ACQUISITION LOGISTICS AND TECHNOLOGY  
103 ARMY PENTAGON  
WASHINGTON DC 20310-0103

SAAL-ZP

MEMORANDUM FOR DEPARTMENT OF DEFENSE OFFICE OF THE INSPECTOR  
GENERAL, 4800 MARK CENTER DRIVE, ALEXANDRIA, VIRGINIA 22350-1500

SUBJECT: Official Army Position for DoDIG Draft Report, Audit of Army Oversight of the  
DOD Language Interpretation and Translation Enterprise (DLITE) II contract

1. The Army concurs with Recommendations 1 and 2 in the subject draft report. Based on the enclosed document, corrective actions have already been taken to close out the recommendations.
2. If there are any questions, please contact Veronica Alexander at [REDACTED] or via email at [REDACTED]

Enclosure

[REDACTED]  
Megan R. Dake  
Deputy Assistant Secretary of  
the Army (Procurement)

## (U) Acronyms and Abbreviations

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<b>(U) ACC-DTA</b>	Army Contracting Command–Detroit Arsenal
<b>(U) ACOR</b>	Alternate contracting officer’s representative
<b>(U) CAS</b>	Consolidated Adjudication Services
<b>(U) CLIPSO</b>	Contract Linguist and Intelligence Program Support Office
<b>(U) COR</b>	Contracting officer’s representative
<b>(U) CRI</b>	Contractor Review Information
<b>(U) DLITE</b>	DoD Language Interpretation and Translation Enterprise
<b>(U) FAR</b>	Federal Acquisition Regulation
<b>(U) INSCOM</b>	U.S. Army Intelligence and Security Command
<b>(U) MFR</b>	Memorandum for record
<b>(U) PWS</b>	Performance work statement
<b>(U) QASP</b>	Quality Assurance Surveillance Plan
<b>(U) USCENTCOM</b>	U.S. Central Command



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