

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Office of Language Services Contractor Application OMB Number 1405-0191 DS-7651

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

Since interpreting and translating do not have formal, standardized certifications or accreditation processes, the Office of Language Services (OLS) uses the Contractor Application. The Contractor Application is designed to gather a detailed history of respondents' linguistic and academic backgrounds to determine whether respondents have the credentials to interpret and/or translate, and to determine whether respondents are legally qualified for contract work with the federal government. Completing the form is voluntary; however, OLS may not be able to proceed with processing the form or considering respondents who do not submit a completed form for potential contract work. This may affect respondents' contract prospects. The U.S. Government is authorized to ask for this information under 5 U.S.C. § 3109; 48 CFR Parts 9, 37, and Section 4.8-803; 5 CFR Parts 731 and 736; and Executive Order 13467 (73 FR 38103).

2. *What business purpose is the information gathered going to be used for?*

The information collected is used by the Office of Language Services staff to determine the preliminary credentials and employment qualifications of the respondents (i.e. whether the person is legally employable in the United States). OLS staff also uses the information gathered from the form during language testing of respondents to verify employment and linguistic history as well as contact information and availability for contract assignments. LS staff also uses the information from the form to enter suitable respondents into the OLS contractor database, and occasionally arrange travel accommodations for them.

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*

Yes. Respondent are able to obtain and complete the form electronically in a pdf fillable format from the OLS internet site at <https://www.state.gov/freelance-linguists-ols/> and clicking on "LS Testing Application Form."

4. *Does this collection duplicate any other collection of information*

This collection does not duplicate any other collection of information.

5. *Describe any impacts on small business?*

This collection does not impact small businesses or other small entities.

6. *What are consequences if this collection is not done?*

If the information is not collected, there will be a significant impact on the U.S. Department of State's interpreting and translating capabilities. The form is the primary means by which the Office of Language Services (OLS) identifies potential interpreting and translating contractors. If the information is not collected, eventually the roster of contract interpreters and translators in all of the languages for which OLS provides services would not contain any qualified contractors.

7. *Are there any special collection circumstances?*

There are no special collection circumstances.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department published a notice in the Federal Register on April 30, 2019 (84 FR 18332) soliciting public comments. The Department did not receive any comments.

9. *Are payments or gifts given to the respondents?*

No payments or gifts will be given to respondents.

10. *Describe assurances of privacy/confidentiality*

Other than protections provided by relevant statutes, such as the Privacy Act, the Department makes no promises of confidentiality.

11. *Are any questions of a sensitive nature asked?*

The form does not ask questions of a sensitive nature.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

The Department estimates that 1000 respondents will complete the DS-7651 in 30 minutes, annually. This determines the annual time burden to be 500 hours (1000 x 0.50). Based on the median annual wage for interpreters and translators obtained from the Bureau of Labor and Statistics website (www.bls.gov)¹, for "Interpreters and Translators" working in the government industry, the weighted estimated hourly wage is \$59.82 (\$39.88 average wage x 1.5). Therefore, the estimated annual burden hour costs to respondents "Interpreters and Translators" is 500 annual burden hours times \$59.82 which yields a monetized time burden of \$29,910.00.

13. *Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.*

There are no monetary burdens to respondents to complete this collection.

14. *Describe the cost incurred by the Federal Government to complete this collection .*

¹ Source: <https://www.bls.gov/oes/current/oes273091.htm#nat>

The estimated burden to the Federal Government is \$39,070.00. The Federal Government estimate is based on the number of expected responses (1000) and the average hourly processing times (1.00) and the average hourly salary of a GS-12² employee who processes and reviews applications. Costs were computed using an estimated workload of sixty minutes per form, multiplied by 1000 estimated responses, multiplied by the average hourly rate of \$39.07. The total is \$39,070. The Department of State pays the individual reviewing the applications their salary and there are no overhead costs.

15. *Explain any changes/adjustments to this collection since the previous submission*

OMB approved Form DS-7651 in 2016 and then extended its approval to July 2019. At the time, the Office of Language Services was implementing system changes. Initially, the design of the LSMX system was to allow the public to access the DS-7651. However, management control issues became apparent and at the end of FY17 and forced the office to divert our application toward a program budget interface. Coincidentally, a key submit matter expert in the area of linguist contract testing experienced an extended illness that prevented the guarantee of available testing candidates. Based on guidance from the IT person who prepared the 2016 collection, the PDF version was approved and useable. Therefore, OLS requested that the IT specialist link the approved PDF version of the application form to the offices website.

Using the web version of the form, Gerry Grondin made the following changes:

- In the title, (LS) was added between Services and Contractor
- In the Translating Section, the beginning text was changed to: Please upload/submit your sample(s) with the application form. We can only accept PDF/Word versions of your sample(s).
- Entire Translating Section regarding applications not being accepted was deleted
- Translating section where text begins Candidates must be..., a coma was added behind unedited
- Translating section where text begins Candidates must be... and after excerpt of a, the text was changed to newspaper article, diplomatic document or political speech). Samples must contain approximately 250-300 words
- In the Typical Translation assignments section, a hyphen was inserted between high and quality
- In the submission instructions, first sentence was changed to: Please upload/submit your samples with your application packet by one of the following methods:
- Second page, under education, “provide” was changed to “indicate”
- Under references and resume, “.” was deleted from behind the numbers
- Under references and resume, “\email” was inserted behind “telephone”
- Under Prior experience, “If applying as ...” was changed to If applying as a translator, summarize your major projects and areas of expertise as a professional translator.

² Source: Office of Personnel Management, “2018 General Schedule (GS) Locality Pay Tables,” <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>.

Include any experience with special translation software such as CAT tools or other software.

- On page 3 of 3, Translation sample was changed from (150-200 words only to (250-300 words only).
- On page 3 of 3, ...insert source text (150-200...) was changed to (250-300 words only)
- On page 3 of 3, ...insert target text (150-200...) was changed to (250-300 words only)
- In the education section, created a dynamic drop down
- Changed the date requirements from MM-DD-YYY to MM-YYYY in the Education and Foreign Residence section.

This collection represents an increase in the number of respondents as a result of the form being deployed to the cloud and integrated directly into the OLS management system.

16. *Specify if the data gathered by this collection will be published.*

The information collected will not be published.

17. *If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.*

The Department will display the OMB expiration date.

18. *Explain any exceptions to the OMB certification statement below.*

The Department is not seeking exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.