

ata American Translators Association
The Voice of Interpreters and Translators

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The Honorable Juan P. Osuna
Director
US Department of Justice
Executive Office of Immigration Review
5107 Leesburg Pike
Falls Church, VA 22041

Ms. Deeana Jang
Head
US Department of Justice
Office of Civil Rights
Division of Federal Coordination and Compliance
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Dear Mr. Osuna and Ms. Jang:

On behalf of the American Translators Association and the undersigned organizations, we are writing to express our concern with the situation regarding the language services contract for the United States Executive Office of Immigration Review. To our understanding, the payment rates and working conditions for interpreters proposed under the new contract let by EOIR pose a significant threat to the orderly operations of the nation's immigration courts, and therefore to the civil rights of immigrants under EO 13166 appearing in these courts. This situation has received ample media coverage, such as <http://www.buzzfeed.com/davidnoriega/immigration-courts-could-lose-a-third-of-their-interpreters>

We are very concerned that vulnerable minorities will be underserved by unqualified and unprofessional interpreters as a result of the conditions in the contract let by the EIOR.

Other government agencies, including those within the Department of Justice as well as the Departments of State and Defense, among others, have recognized the importance of using professional interpreters, and pay accordingly, whether directly or through contract vehicles. The rates offered under the new contract undercut the current market significantly, as noted in the media reports. The additional overheads for recruiting, project management, and quality assurance make the current contract pricing even more unrealistic.

In addition, our organizations would like to suggest that one way the Department may consider ensuring quality language services is to avail itself of industry standards. In

accordance with the National Technology Transfer and Advancement Act (NTTAA) of 1996, government agencies are encouraged to use consensus industry standards. Therefore, the undersigned organizations urge US DOJ to conform to ASTM F2089-15 Standard Practice for Language Interpreting.

Interpreting is a demanding skill that requires not only mastery of both languages and specialized terminology, but also years of practical training in interpreting, and an understanding of the ethics around providing this service. A person who speaks another language, however well, may not necessarily be able to convey the information between two language speakers accurately or completely, absent professional training and experience as an interpreter.

It is easy to understand the importance of using professional interpreters, if one imagines being in court or in hospital in an area where you don't speak the language. Everyone would want to make sure that all of the critical information they provide is accurately conveyed to the relevant authorities. A person's life may depend on it. The situation is no different for those persons arriving in immigration court.

We hope that the EIOR will carefully weigh the risks inherent in the low rates and working conditions proposed under the new contract, and work to ameliorate this situation.

Respectfully submitted on behalf of the following organizations:

American Translators Association (www.atanet.org)

Association of Language Companies (www.alcus.org)

Globalization and Localization Association (www.gala-global.org)

International Medical Interpreters Association (www.imiaweb.org)

InterpretAmerica (www.interpretamerica.com)

Joint National Committee for Languages (www.languagepolicy.org)

National Association of Judiciary Interpreters and Translators (www.najit.org)

National Council on Interpreting in Health Care (www.ncihc.org)

Red-T (www.red-t.org)