



U.S. Citizenship
and Immigration
Services

USCIS TRANSFORMATION PROGRAM

CONCEPT OF OPERATIONS

March 28, 2007

Version 1.5

EXECUTIVE SUMMARY

Introduction

The challenge of fulfilling the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) mission is derived from a workload that is both large and diverse. As the agency through which foreign nationals are processed towards immigration benefits in the United States, USCIS should serve as a model of transparent, fair, efficient and secure processing.

More than 7.5 million applications and petitions are received per year, comprised of over 50 types of immigration benefits. USCIS recognizes, furthermore, that its dependence on paper files makes it difficult to efficiently process immigration benefits, verify identity of applicants, and provide other government agencies the information required to quickly identify criminals and possible terrorists.

The purpose of this Concept of Operations is to describe both the current business environment and the future processes that will serve as the foundation for the way USCIS manages customer information and adjudicates benefits requests. This document should be used as a window through which to view how business, information and technology solutions will interact with, support, and enhance USCIS's mission. As such, it is a tool for creating a common agency vision of its future operational environment.

USCIS Transformation Program

USCIS is embarking on an enterprise-wide Transformation Program that will transition the agency from a fragmented, paper-based, operational environment to a centralized and consolidated environment, utilizing state of the art case management tools and a paperless adjudication process. The Program is a large-scale, complex undertaking that will form the foundation of USCIS-wide business processes and Information Technology (IT) enabled re-engineering. The new operational environment will employ the types of online customer accounts used in the private sector in order to facilitate transactions, track activities, and reduce identity fraud. The revised processes will also help the agency to meet customer expectations for on-demand information and immediate real-time electronic service over the Internet.

The Transformation Program Office (TPO) is charged with the development of a flexible and efficient organization supported by an integrated technical environment for both its customers and employees. The TPO will provide a centralized management structure to oversee all transformation activities within USCIS, including the coordination of several initiatives converting the current mix of legacy infrastructure and paper-based business processes to electronic-based business processes.

The objectives and long term benefits of the Transformation are:

- *National Security and Integrity*: USCIS will ensure the integrity of the immigration system and help to safeguard the country by effectively collecting, analyzing and sharing information used to verify identity, eligibility, and status of individuals seeking to become citizens of the U.S. or study, live, or work in this country. A responsible and transparent approach toward the handling of such



personal information will protect the rights of individuals and organizations interacting with USCIS and thereby foster their trust and cooperation with the agency.

- *Customer Service*: USCIS will deliver world-class customer service by adjudicating requests for benefits accurately and within acceptable timeframes, by providing timely and accurate information about immigration benefits and the status of customer requests, and by promoting civic values
- *Operational Efficiency*: USCIS will be an innovative, flexible, and accountable organization that invests in its people and infrastructure to ensure cost-effective and consistent results.

Proposed Operational Concept

The proposed operational concept will transform the USCIS business approach to a “person-centric” model based on customer accounts. The approach will enable applicants and petitioners and others interacting with USCIS to become “account holders,” engaging in transactions with the agency, rather than merely submitting applications and petitions.¹ To improve customer identification, the proposed operational concept is proposing to use biometrics for applicants, petitioners, and household members over the age of 14. All information related to an individual, including a history of all transactions with the agency, will be linked in a single account and available through the system, thereby creating the transformed end-to-end adjudicative process.

USCIS plans to streamline all adjudication related activities into an integrated operational concept. This operational concept should standardize processes across USCIS operations in relation to case intake, biometrics, background checks, adjudication, scheduling, and notifications. The Transformation Program will affect most aspects of USCIS operations and technology. USCIS operations will be transformed from a paper based process to an electronic environment,² making it possible to incorporate more effective processing of low risk applicants and better identification of higher risk individuals. The successful implementation of the proposed operational concept will improve customer service, enhance national security, and assist USCIS in achieving operational excellence.

¹ In discussing the proposed operational model, this document uses the term transaction to refer to the interaction between customers who seek benefits and USCIS. The term transactions can also refer to actions on accounts involving other U.S. immigration agencies, such as visa applications to consulates, port entries with CBP, and enforcement actions by ICE.

² All account and transaction data are subject to verification by USCIS prior to processing, in accordance with regulatory requirements.



APPROVAL PAGE

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REVISION HISTORY

Version	Date	Author	Summary of Changes
0.1	07/14/06	Transformation Program Office	Initial Draft
0.2	08/02/06	Transformation Program Office	Revisions based internal comments
0.3	09/14/06	Transformation Program Office	Revisions based on comments from USCIS Management and DHS:ITAC
1.0	09/29/06	Transformation Program Office	Revisions based on comments from USCIS Field Offices
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1.3	12/14/06	Transformation Program Office	Updates based on feedback from TLT, and reflection of October, 2006, USCIS Reorganization
1.4	01/08/07	Transformation Program Office	Updates reflect staffing changes in TPO.
1.5	03/28/07	Transformation Program Office	Updates to reflect results of Transformation Program Business Process Alternatives Analysis.

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1 INTRODUCTION

The challenge of fulfilling the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) mission is derived from a workload that is both large and diverse. As the agency through which foreign nationals are processed toward immigration benefits in the United States, USCIS should serve as a model of transparent fair, efficient, and secure processing.

More than 7.5 million applications are received per year, comprised of over 50 types of immigration benefits. USCIS recognizes that its dependence on paper files makes it difficult to efficiently process immigration benefits, verify identity of applicants, and provide other government agencies the information required to quickly identify criminals and possible terrorists.

To address these concerns, USCIS is embarking on an enterprise-wide Transformation Program that will transition the agency from a fragmented, paper-based filing operational environment to a centralized, consolidated environment, utilizing state of the art case management tools and paperless adjudication process. The Program is a large-scale, complex undertaking that will form the foundation of USCIS-wide business processes and Information Technology (IT) enabled re-engineering. The new operational environment will employ the types of online accounts used in the private sector to facilitate customer friendly transactions, track activities, and reduce identity fraud.

Changes to immigration policy and practices occur frequently, whether through congressional addition or modification of visa categories, through new background checks or biometric technologies, through substituted or alternative services such as enrollment processing, through data sharing opportunities with sister and law enforcement agencies, or through administrative performance improvement goals. As a result, new USCIS processes will require inherent flexibility. New opportunities to partner with the private sector and to share data and services with other federal agencies will be designed to accommodate additional and alternative means of service delivery. Additionally, USCIS systems should also be able to access available government and private databases to verify information related to eligibility for an immigration benefit.

1.1 Purpose of this Document

The purpose of this Concept of Operations (ConOps) is to describe both the current business environment and the future processes that will serve as the foundation for the way USCIS manages customer information and adjudicates benefits requests. This document should be used as a window by which to view how business, information, and technology solutions will interact with, support, and enhance USCIS's mission. As such, it is a tool for creating a common agency vision of its future operational environment.

1.2 Recommendations for Change

While USCIS has long recognized the need to significantly improve the management of customer data, the DHS "Second Stage Review" highlighted the agency's requirement to expeditiously continue its efforts to ensure that national security and customer service



vulnerabilities are fully addressed. The Government Accountability Office (GAO) has expressed similar concerns, such as the processing of customer benefits and the agency's ability to report on processing time or quality assurance around adjudicative decisions.³ Listed below are USCIS's solutions to these concerns:

- Establish a person-centric, account-based, biometrically supported process that provides a higher level of service to all applicants, presents all data regarding a person's immigration status and history within a single system; ensures that security checks are completed before any benefits request is adjudicated; and shares data and operations with other agencies.
- Use modern, web-based tools to create a comprehensive paperless filing and adjudication system that integrates information used for adjudication and analysis and thereby improves decision integrity and provides enhanced datasharing capabilities with other federal agencies.
- Develop a performance measurement system (define, evaluate, and select appropriate indicators) that identifies the relevant outcomes and other performance criteria to be addressed.
- Upgrade the current hardware, business application, and desktop infrastructure at a reasonable cost.

Such changes have also been advocated by the DHS Office of the Ombudsman.⁴ In several reports to Congress, the Ombudsman has advocated for a more "person centric" process, standardized form packages, more comprehensive e-filing, and the elimination of geographic boundaries which restrict the ability of the applicant to seek the most efficient service.⁵

³ See, GAO Report 00-185, 01-488, 03-883, 04-309R, 05-813, 06-20, 06-100, 06-133.

⁴ The function of this office is to: 1) to assist individuals and employers in resolving problems with USCIS; 2) identify areas in which individuals and employers have problems in dealing with USCIS; and 3) to the extent possible, propose changes in the administrative practices of USCIS to mitigate problems identified under paragraph (2). [Homeland Security Act - Section 452 - Citizenship and Immigration Services Ombudsman]

⁵ See, Citizenship and Immigration Services Ombudsman Annual Report 2004 - 2006.
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2 USCIS TRANSFORMATION PROGRAM

USCIS recognizes that its reliance on a paper intensive, forms-centric way of doing business makes it difficult to efficiently process immigration benefits, combat identity fraud, and provide other government agencies the information required to quickly identify criminals and possible terrorists. To address these concerns, USCIS has created a Transformation Program Office (TPO) to modernize the way it does business. The TPO is part of a broader USCIS Transformation effort that is being led by the agency's senior management (see Figure 2-1).



Figure 2-1: Transforming USCIS

This document is limited to a discussion of the transformation of the USCIS business operations.

The TPO is charged with the development of a flexible and efficient organization supported by an integrated technical environment for both its customers and employees. The TPO will provide a centralized management structure to oversee all transformation initiatives within USCIS including the coordination of several initiatives around converting the current mix of legacy infrastructure and paper-based business processes to electronic-based business processes. Technologies employed will increase capabilities, streamline processes, and support the collection of customer generated service fees.



2.1 Transformation Mission

The Mission of the USCIS Transformation is to “deliver a new business identity, fresh tools and dependable information to enable the agency’s representatives as confident and proud stewards of America’s promise.”⁶ As illustrated below (see Figure 2-2), the USCIS goals for the Transformation program address three major, partially overlapping functional areas:

- *National Security and Integrity* –
 - USCIS will create an immigration benefits system that is efficient, consistent, accurate and trusted and will help to safeguard the nation by ensuring that ineligible individuals are not granted immigration or citizenship benefits. The responsible and transparent approach toward the handling of personal information will protect the rights of individuals and organizations interacting with USCIS and thereby foster their trust and cooperation with the agency.
- *Customer Service* –
 - USCIS will deliver world-class customer service by adjudicating requests for benefits accurately and within acceptable timeframes, by providing timely and accurate information about citizenship and immigration benefits and the status of customer requests, and by promoting civic values.
- *Operational Efficiency* –
 - USCIS will be an innovative, flexible, and accountable organization that invests in its people and infrastructure to ensure cost-effective and consistent results.



Figure 2-2: USCIS Transformation Goals

Transformation will affect most aspects of USCIS operations and technical systems. USCIS operations will be transformed from a paper based process to an electronic environment, making it possible to incorporate more effective processing of low risk

⁶ USCIS Transformation Program Strategic Plan – Business Vision, September 2006, p. 5, Draft. USCIS Transformation Program ConOps, Version 1.5 March 28, 2007



applicants and better identification of higher risk individuals. Transformation will ensure an applicant's unique identity is known through use of DHS biometrics and enumeration strategies which will "lock in" a person's identity. Ensuring the validation of applicant identity will enhance national security, help to reduce fraud, and reduce the collection of duplicative information. Other benefits of the USCIS Transformation include the ability to:

- create customer accounts to provide the foundation of a person-centric view of information;
- ensure a complete and easily accessible set of records;
- provide customers with on-demand information and the ability to update their records;
- access customer data through a single and extensible technology base used across the agency;
- make informed and timely benefits decisions based on a person-centric view of information;
- improve the efficiency of analysis, decision making, and reporting,
- communicate effectively within USCIS and to the agency's customers;
- potentially reduce Freedom of Information Act (FOIA) requests for agency documents;
- collect and share reliable data across federal agencies;
- enhance the ability to formulate sound policy recommendations; and
- prevent future backlogs through efficient case management and workload tracking.

2.2 Assumptions and Constraints

The TPO is responsible for defining the mission, business, security, and functional requirements for the system and the system design, development, and deployment respectively. The Assumptions and Constraints listed below, to some degree affect the ability of the TPO to implement the proposed operational concept. In the event that the assumptions cannot be met, the proposed operational concept may need to be revised.

2.2.1 Assumptions

Assumptions are defined as future situations beyond the control of the TPO, whose outcomes affect the development and operation of the new or modified system. The TPO has identified the following assumptions:

- A. Congress will continue to support the agency in its transformation efforts.
- B. Temporary Worker Program (TWP) legislation will pass within two years. The system is being designed to accommodate a TWP as another product line whose functions will be in keeping with the components of other processes.



- C. Statutory, regulatory, and procedural changes will continually be made to immigration benefits, such as changes being made for orphans, religious workers, and naturalization applicants, and new categories for trafficking victims.
- D. DHS will impose standards for enumeration and support for biometric verification under the Unique Identity Initiative.
- E. USCIS will have the network capacity and technology infrastructure to deploy a publicly accessible web-centric environment.
- F. USCIS will complete a web portal project, including a module by which an online customer can be directed to the appropriate customer transaction type. Once the customer has selected a transaction type, the Transformation web tools will take the customer through the remaining process.
- G. Private entities are willing to make a business of facilitating USCIS customer account set-up and application intake, including the capture of customer electronic data, images and payment for upload to agency systems using publicized USCIS standards.
- H. Services for the capture of biometrics, for the background checks, and for production and delivery of secure identity documents will be provided by components of USCIS, whether directly, through contract, or through privatized arrangements. The new operational concept must accommodate existing and expanded privatized delivery systems for such services and must ensure that background checks and biometric enrollment are secure through validation and government involvement.
- I. Partner agencies will be able to access USCIS customer account data using web enabled tools as needed.

2.2.2 Constraints

Constraints are defined as impositions on the future operational concept, because of conditions beyond the control of the Transformation Program. The TPO has identified the following constraints:

- A. Government regulations relating to the submission of information, Systems of Records Notice, Privacy Act, and Paperwork Reduction Act.
- B. Funding levels to support incremental development and deployment.
- C. Implementation of IT infrastructure upgrade and enhancements within USCIS.
- D. The volume of potential beneficiaries under the TWP may require new channels of enrollment ranging from expansion of Application Support Centers, to the addition of privatized enrollment options or some combination.
- E. The solution must be able to interface with both internal and external systems.



- USCIS legacy systems, including⁷:
 - Computer Linked Application Information Management System 3 (CLAIMS 3)
 - Computer Linked Application Information Management System 4 (CLAIMS 4)
 - Central Index System (CIS)
 - Reengineered Naturalization Application Casework System (RNACS)
 - Service Request Management Tool (SRMT)
 - Fraud Detection National Security (FDNS)
 - Marriage Fraud Amendment System (MFAS)
 - Refugee Asylum Patrol System (RAPS)
 - Deportable Alien Control System (DACs)
 - Freedom of Information Processing System (FIPS)
 - Verification Information System (VIS)

- DHS systems, including:
 - Treasury Enforcement Computer System (TECS)
 - Interagency Border Inspection System (IBIS)
 - Student and Exchange Visitor Information System (SEVIS)
 - Treasury Enforcement Computer System (TECS)

- Partner Agency systems (DOJ, DOS, DOL, etc.)

⁷ As part of the Modernization Program, some of the USCIS systems identified are scheduled for decommissioning and data in these systems may be accessed through other means.
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3 OVERVIEW OF USCIS

3.1 USCIS Benefits and Workload

The DHS USCIS,⁸ implements U.S. immigration policy through the processing and adjudication of immigrant and non-immigrant benefits, including:

- *Family-based petitions* - facilitating the process for close relatives to immigrate, gain permanent residency, work, etc.;
- *Employment-based petitions* - facilitating the process for current and prospective employees to immigrate or stay in the U.S. temporarily;
- *Asylum and Refugee applications* - adjudicating asylum and the processing of refugees;
- *Naturalization* - approving citizenship of eligible persons who wish to become U.S. citizens;
- *Special status programs* - adjudicating eligibility for U.S. immigration status as a form of humanitarian aid to foreign nationals; and,
- *Document issuance and renewal* - including verifying eligibility, producing and issuing immigration documents.

USCIS consists of approximately 15,000 employees and contractor personnel located in over 250 offices worldwide, including three international District Offices overseeing 28 Field-Offices around the globe. Domestically, USCIS is comprised of four Service Centers, a National Benefits Center (NBC)⁹, a National Records Center (NRC), four Regional Offices, located in Burlington, VT (Northeast Region), Dallas, TX (Central Region), Laguna Niguel, CA (Western Region), and Orlando, FL (Southeast Region), and 73 Field Offices organized in 26 Districts, and 8 Asylum Offices, reporting directly to USCIS Headquarters.¹⁰ Additionally, there are 115 contractor operated Application Support Centers (ASC), and the National Customer Service Call Center (NCSC).

⁸ USCIS was established within DHS on March 1, 2003.

⁹ The NBC has all the functions of a Service Center but reports to Field Operations. Based on functionality, the NBC has been referenced as a Service Center throughout the rest of the document.

¹⁰ In Fiscal Year (FY) 2005, USCIS completed approximately 7.5 million benefit applications and received 6.3 million more.

3.2 Service Centers

The four USCIS Service Centers oversee the initial intake of the majority of applications/petitions and for the adjudication of immigration applications/petitions that do not require face-to-face interviews. The Service Centers are located in Laguna Niguel, CA (CSC), Lincoln, NE (NSC), St. Albans, VT (VSC), and Dallas, TX (TSC), and report directly to the Service Center Operations Division at USCIS Headquarters.

The Service Centers are responsible for approximately 4.7 million adjudications per year. It is a common practice to divide the workload into “product lines” based upon the benefit type:

- non-immigrant status
- temporary employment
- family-based immigration petitions
- employment-based immigrant petitions, and
- benefits documentation (e.g., employment authorization documents, replacement cards, travel documents, etc.).

While Service Centers adjudicate the majority of applications and petitions, cases requiring interviews are forwarded to the responsible Field Office, while all Asylum applications are forwarded to an Asylum office.

3.3 Lockboxes

While the majority of applications are submitted to a Service Center, over 3 million applications are processed at a lockbox annually and over 250 million dollars collected each year.¹¹

The lockbox process provides a mechanism to electronically capture information (e.g., creating images from paper applications, collecting data from petitions and supporting documents), while systematically running a set of business rules against the applications to determine if they are filled out properly and the correct fees submitted. Additionally, some

¹¹ Lockboxes are operated by the U.S. Department of Treasury and are located in Chicago and Los Angeles. Applications/benefits fees receipted at the lockbox are: Application to Replace Alien Registration Card, Application for, Replacement/Initial Nonimmigrant Arrival/Departure Record, Petition for Alien Fiancé (e), Petition for Alien Relative, Application for Travel Document, and Application for Permission to Reapply for Admission into the U.S. After Deportation or Removal, Notice of Appeal to the Administrative Appeals Unit (AAU), Petition for Amerasian, Widow(er), or Special Immigrant, Application to Register Permanent Residence or to Adjust Status, Supplement A to Form I-485, Application to Register Permanent Residence, Application To Extend/Change Nonimmigrant Status, and supplement, Application for Waiver of Grounds of Excludability, Application for Waiver of the Foreign Residence Requirement, Application for Status as a Temporary Resident, Application for Waiver of Excludability, Medical Examination of Aliens Seeking Adjustment of Status, Application for Employment Authorization, Application for Family Unity Benefits, Application for Temporary Protective Status, Application for Action on an Approved Application or Petition, Affidavit of Support, Sponsor's Notice of Change of Address, Motion to Reopen Before the Commissioner, Multi Beneficiary, Notice of Entry of Appearance as Attorney or Representative, and Notice of Appeal to BIA of Decision of District Director.



applications are also electronically filed, in which case the data is transmitted directly to a Service Center.¹²

Application packages received at the lockbox are fully scanned, including any supporting documentation, and bar codes, receipt notices and rejection notices for applicants are generated, and any fees deposited to USCIS via the Treasury.¹³ The lockbox then forwards the data captured during scanning to the USCIS CLAIMS 3 database system for use at a Service Center, which also receives the paperwork itself.¹⁴

Cases that are filed prematurely are prepared for manual rejection at receipt.¹⁵ At the Service Center, cases lacking proper signature or those without the correct fee are also identified for rejection. Both properly filed cases and cases marked for rejection are forwarded for data entry, at which point information is entered into the USCIS computer system and fees are forwarded to a U.S. Department of Treasury designated bank for deposit into the Treasury General Account, or in some cases forwarded to a Treasury designated lockbox facility operated by a commercial bank.

3.4 Field Offices

While the majority of adjudications can be completed in the Service Centers, the 73 USCIS Field Offices are responsible for the adjudication particularly of those applications requiring face-to-face interviews, such as requests citizenship (approximately 750,000 per year). They also process some applications and petitions, such as international adoptions and permanent residency, that do not require interviews. However, these applicants may also be interviewed, at the discretion of the adjudicating officer.

3.5 Application Service Centers

While the adjudication of benefit applications is performed at the USCIS Service Centers and Field Offices, applicants for the majority of benefits are required to provide fingerprints for the performance of security checks. The capture of applicant biometrics is performed at one of the 115 Application Support Centers. In FY-05 the ASCs processed 2,254,508 10-prints and 1,472,928 photos, press-prints, signatures (I-89s or card collection data form). Many of the I-89 customers were also 10-print customers, in which approximately 2.6 million customers were processed.

¹² Applications/benefits e-filed directly to a lockbox are as follows: Application to Replace Alien Registration Card, Petition for a Non Immigrant Worker, includes supplements, Non Immigrant Petition based on a Blanket L Petition, Petition for Non Immigrant Worker filing fee exemption, Application for Travel Document, Immigrant Petition for Alien Worker, Application To Extend/Change Nonimmigrant Status, and supplement, Application for Employment Authorization, Application for Temporary Protective Status, Request for Premium Processing Service, Notice of Entry of Appearance as Attorney or Representative.

¹³ Currently, the images collected are being stored and may potentially be of use for future USCIS access in relation to electronic adjudications and/or other customer service purposes.

¹⁴ See section 4.2.4., for a more detailed explanation of this process.

¹⁵ Premature filings are those received before the applicant is eligible or meets the legal criteria to receive a benefit.



3.6 International Operations, Refugees, and Asylum

International District Offices accept certain applications and petitions, provide information and forms to the public, and work closely with the U.S. Department of State (DOS) in various aspects of the visa-issuing process. In addition, they maintain close liaison with agencies of the countries in which they are located, and provide assistance to domestic USCIS offices relating to foreign laws and documents. International Offices also have adjudicative, logistical, and managerial roles in the U.S. Refugee Resettlement Program. They typically adjudicate relative petitions, Refugee/Asylee derivative and relative petitions, military naturalization, immigrant and non-immigrant waivers, and orphan petitions.

USCIS is responsible for determining whether overseas refugee applicants are eligible for resettlement in the U.S.¹⁶ The agency has a dedicated corps of Refugee officers, who are located in Washington D.C. and travel to overseas locations to conduct interviews of applicants for resettlement to the U.S. While USCIS interviews applicants overseas, DOS is the responsible agent for overall coordination and processing of refugees applications.

The Asylum Division applies asylum laws to applicants already in the U.S. The process permits both legal and illegal immigrants in the U.S. who are not in immigration proceedings to apply for asylum if they are unable or unwilling to return to their country of origin due to past persecution or a well-founded fear of persecution. In addition to adjudicating petitions, Asylum officers also conduct credible and reasonable fear interviews, adjudicate applications for benefits under Section 203 of the Nicaraguan Adjustment and Central American Relief Act (NACARA) and assist in refugee processing overseas. Applicants who are not approved for asylum and are not in legal status are issued a Notice to Appear (NTA) before an immigration court judge for determination of final removal orders from the U.S.

3.7 Customer Service Division

The NCSC provides tier one assistance to USCIS customers. The NCSC consists of a combination of six government and contract operated call centers, that provide both automated and “in person” toll-free phone services. Using scripted information to answer questions and provide services, customer service representatives screen questions about case status and take “referrals” for field offices, who then research cases and respond directly to customer inquiries. Centers also take orders for immigration forms and schedule a limited range of appointments. In FY 2005 the NCSC received approximately 20 million calls, averaging roughly 385,000 per week.¹⁷

¹⁶ An annual refugee admissions ceiling is established by the President, in consultation with the Congress. For FY 2005, the Presidential Determination established an admissions ceiling of 70,000.

¹⁷ Additionally, there are approximately 1,000 information officers who are stationed at field offices throughout the United States.



4 Description of the Current Business Process

4.1 Overview

Depicted below (see Figure 4-1), the core USCIS business process involves the adjudication and processing of an immigrant and non-immigrant benefit.¹⁸ While USCIS offers a multitude of benefit types, and there is some variance in how each benefit is adjudicated, the process generally involves the following three major components:

- **Apply:** USCIS is the responsible agent, on behalf of the U.S. to: 1) ensure immigration benefit types are publicized to the general public, 2) provide mechanisms to apply for these benefits, and 3) receipt such applications.
- **Adjudicate:** USCIS is responsible for the adjudication of each benefit application. The majority of granted benefits and services do not require face to face interviews and are processed at USCIS Service Centers.
- **Issue:** USCIS is responsible for issuing a decision, granting immigration status, denying benefits or referring customers to other government entities (e.g., immigration court, etc.). The agency is also responsible for sending documents to customers, such as a denial letters, lawful permanent resident cards and certificates of citizenship.

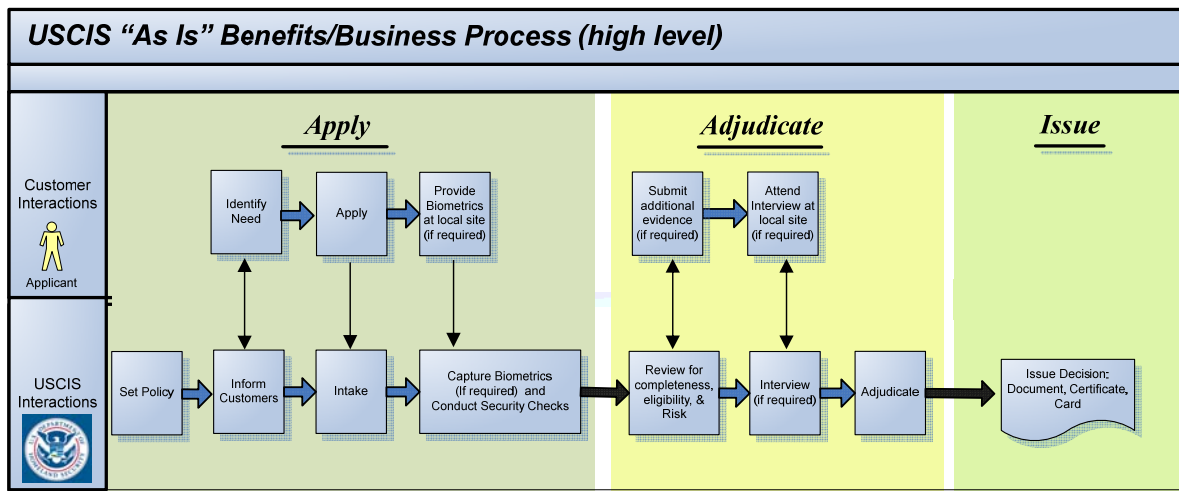


Figure 4-1: USCIS "As Is" Benefits/Business Process

The following descriptions apply to the prevalent agency practices for each of the process steps, with the understanding that there are some variations from office to office. Also,

¹⁸ This is a high level representation and does not include Appeals or Removal Processes.
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certain programs, such as asylum and refugee processing, follow substantially different procedures. Consequently, the descriptions in the following sections may not apply.

4.2 Apply

4.2.1 Set Policy

USCIS is responsible for the preparation of regulations and policy directives to ensure that the agency uniformly and consistently interprets and applies legislation as it relates to the adjudication of applications/petitions for immigration benefits. The agency must ensure that other government entities, stakeholders, and customers receive timely and accurate information regarding its regulations and policy decisions. USCIS communicates regulations and policy directives internally through memorandums posted in daily emails and posted to the USCIS internal website. Externally, policy changes are published through the Federal Register, media notices, and postings to the USCIS public website.

USCIS is the primary producer of information on immigration to the U.S. and through external Federal interagency sources enhances data collection and information sharing to develop reliable and valid data on which to formulate policy analyses and subsequently policy development.

4.2.2 Inform Customer

USCIS provides information through its website, the national call center, district offices, press releases, and outreach activities.¹⁹ Information provided relates to application status, eligibility for immigration benefits, immigration law, policies, and local policies and procedures.

The USCIS website contains extensive information relating to immigration law, policy and procedures, forms, and local office information. It also has a portal to the USCIS InfoPass system where customers can self-schedule appointments to see an Immigration Information Officer at a field office. The website also offers limited case status information on applications filed at Service Centers.

For other inquiries or more detailed explanations, customers are advised to call the NCSC. Case related inquiries received outside of normal processing times are manually entered into the Service Request Management Tool (SRMT), a stand-alone system that routes the requested information to a field office or a Service Center where an information officer can draw down inquiries for resolution.

¹⁹ <http://www.uscis.gov/>
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Additionally, information officers are assigned to Field Offices and Service Centers to assist customers with immigration benefit or case status inquiries. These officers also assist customers with “emergency” issues relating to employment and travel authorization.²⁰

Failure to manage changes to a customer’s address represents at least 10 percent of USCIS case inquiries. Lacking a unique account for each customer to capture information, USCIS must require customers to notify the agency of an address change separately for each pending case.²¹ Historically, address change correspondence has not always been successfully routed to corresponding case files. To help address this problem, SRMT is also being used to input customer changes of address that need to be placed into individual case files or other systems. In the naturalization system, which is a centralized database, address changes are taken by phone and manually keyed into the case management system.²² Aliens, including lawful permanent residents, are required to notify DHS of changes to their address within 10 days of relocating. This is done through a change of address form, from which data is entered into a stand alone database that must be queried whenever a customer mailing is returned as undeliverable.²³

Inquiries on problem cases come to agency’s attention through a multitude of avenues. USCIS’s inability to digitize the majority of customer applications and supporting documentation, as well as the lack of national access to a central database, greatly impede employees from responding efficiently to such inquires. Frustrated with the agency’s response to a case, some customers attempt to resolve their concern through congressional offices, attorneys, ombudsman liaisons, and the media. This can result in duplicative resources dedicated to the same inquiry.

4.2.3 Intake

Applications for immigration benefits start with the customer. Customers identify information related to a particular benefit by accessing information on the USCIS website, appearing in person at district offices, or by contacting outside attorneys or accredited representatives. Currently, USCIS customers apply for benefits using paper forms that can be downloaded from the agency website or ordered from USCIS by telephone or mail.

²⁰ At times, USCIS is unable to quickly resolve customer issues since pertinent information is located in a paper file which is not immediately accessible or because certain applications and petitions are not tracked electronically to facilitate same day resolution.

²¹ For example, if a customer has a pending asylum application, adjustment application, work card application, and travel document application and moves, he/she must send a separate notification of change of address to each office (or even separate notifications to the same office) handling each application, separate of each case. In practice this information should be inputted into an agency system - CLAIMS3 or, if it’s in the local office, the letter indicating an address change should be placed into the customer file so that any new mailings to the client are received at the most current address. Because of the lack of consistency in the availability of systems across the agency, updates are handled in different ways depending on location.

²² USCIS is preparing an online change of address system which will feed into the same inquiry system fed by call centers.

²³ The upcoming online change of address system will allow customers to complete the change of address form (form AR-11) online.



Applications are considered filed when accompanied by the required fee and signed by the appropriate person.

Outside of a limited number of benefits which can be e-filed to USCIS, the majority of immigration applications and petitions are paper based and typically mailed to a Service Center or lockbox.²⁴ Because e-filed data is not integrated into the rest of the adjudication process, and because supporting paper documents must be submitted separately and matched up with printed e-filed data, USCIS is not able to deliver better service to e-filing customers. Furthermore, USCIS still prints out a hard copy of all electronically filed applications, resulting in additional processing costs for paper, ink, printers, etc. Thus even e-filed applications result in hard copy records which have to be matched to the respective receipt or Administrative file (A-File).

For the overwhelming majority of filings, which are made by paper, USCIS uses several intake methods that are determined by the type of application and the “jurisdiction” in which an applicant resides.²⁵ It is the responsibility of the customer to ascertain whether an application should be filed by mail to a particular field office, service center, or lockbox.²⁶ Applications submitted to incorrect locations are either forwarded to the appropriate office or rejected and returned to the customer with instructions on where to resubmit the paperwork. In general, submitted paperwork consists of both the government supplied application form and a variety of supporting documents, such as a birth certificate.

Additionally, significant variation exists among USCIS field sites regarding the submission of application fees. While electronic filings currently require credit card payment or the electronic transfer of funds from a checking or savings accounts, USCIS offices and the lockbox also accept checks and money orders. Field offices do not have an electronic system to record fees and therefore issue “cash register” style receipts. In contrast, applications filed electronically to Service Centers through the lockbox are linked to an automated system that generates receipts and tracking numbers.

Limited data is entered into USCIS systems about a case, and data entry errors can be frequent and difficult to identify and correct. While a small percentage of cases are subject to imaging by a lockbox, those images are not generally viewable by Adjudications Officers for lack of a document management repository and engine for display. Thus, all cases are managed through the movement of paper files within and between USCIS facilities.

²⁴ For a list of applications and petitions that can be e-filed, see the U.S. Citizen and Immigration Services Website, *Introduction to E-filing* (<http://www.uscis.gov/e-filing>). Additionally, some applications such as petitioning for advance processing of an orphan (I-600A) can be submitted directly to a local field office.

²⁵ A “jurisdiction” is typically determined by an applicant’s home residence.

²⁶ The majority of applications and petitions are mailed by customers to a Service Center. Currently, the Treasury lockboxes receive over 3 million applications annually, electronically scans the entire applicant package (including supporting documentation) and forwards the paper application to the NBC.

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4.2.4 Biometrics, Fees, and Background Checks

USCIS only requires full biometrics (i.e., fingerprints, photograph and signature) for certain types of applications.²⁷ When required by the agency, applicants submit fingerprints at a local ASC. Although ASCs fingerprint over 2 million applicants per year, USCIS does not have the capability to retrieve or store biometrics outside of the specific instance in which an applicant applied for a benefit. As a result, fingerprints can not be automatically cross-checked electronically against future applications filed. Fingerprint data submitted by an individual are stored by US-VISIT; USCIS currently has no means to retrieve that data systematically for future use.²⁸

In order to schedule appointments for biometric data capture and interviews, information is extracted from CLAIMS and sent to the Scheduling Notification for Applicant Processing System (SNAP), a fingerprint scheduling program. Additionally, an appointment is automatically scheduled for fingerprinting at a local ASC and an appointment notice created and sent to the applicant.

Biometric data received from the ASCs are also used to generate the Federal Bureau of Investigations (FBI) fingerprint check. The results of the fingerprint check are placed in the file with the corresponding application. In cases where the fingerprint results in an “Ident”, the encounter history (including any rap sheet information) is printed directly from the Benefits Biometric Support System (BBSS).²⁹

A combination of automated and manual methods is used by USCIS to conduct background checks on applicants. These checks include name checks conducted by the Interagency Border Information System (IBIS),³⁰ as well as fingerprint and name checks conducted by

²⁷ While all applications require a signature, in general only applications for permanent residency, naturalization, asylum and adoption of orphans require full biometrics. More recently, the agency has also begun to verify customer identity using biometrics for the renewal of lawful permanent resident cards. Since April 2003 USCIS has been collecting and storing electronic images of 10-prints. The 10-prints are on tapes and shared with US-VISIT. In the Image Storage and Retrieval System (ISRS), legacy INS kept press-prints, photos, and signatures that were used to make Permanent Resident Cards and Employment Authorization Documents at ICPS (and previously at the Texas card facility) since 1978. USCIS has been developing a Biometrics Storage System (BSS) designed to facilitate retrieval and re-use of such biometrics.

²⁸ The images for these biometrics, including previous stores of electronically acquired biometrics, are being loaded into the biometrics data stores of US-VISIT IDENT, where they are being compared at the time of loading with images already in IDENT.

²⁹ BBSS is a USCIS System that stores fingerprint images and biographic data, and can submit fingerprint check requests to the FBI.

³⁰ IBIS is managed by CBP and is a database of name-based lookouts, wants, warrants, arrests, and convictions consolidated from over 20 agencies. A complete IBIS query also includes a concurrent check of selected files in the FBI Criminal Justice Information Services (CJIS) Division Integrated Automated Fingerprint Identification System (IAFIS). USCIS began conducting automated, name-based queries of IBIS for all USCIS applications in 2002. With an average of 3.7 names per application to check, USCIS conducted over 27 million IBIS checks in FY 2004. Source: Office of Inspector General (Nov, 2005), *A Review of U.S. Citizenship and Immigration Services Alien Security Checks* (DHS-OIG Report No. 06-06).



the FBI.³¹ Additionally, the Asylum program uses an automated fingerprint identification system, the Automated Biometric Identification System (IDENT), for all asylum applicants.³²

Prior to conducting the background checks, USCIS collects the applicable fees. Service Centers and lockboxes are responsible for collecting such fees, and entering receipts and other data into automated systems for a majority of applications and petitions. When an application is received, the information is keyed into CLAIMS 4, if it refers to naturalization or CLAIMS 3 for all other applications.³³ Once the information is entered into either system, the FBI name check is conducted through a separate transmission of the information to the FBI.

Once the information is entered into either system, an IBIS check is automatically conducted through an interface with a different database. Field offices do not have access to this database and therefore run IBIS checks manually, using the Treasury Enforcement Computer System (TECS).³⁴ Background check results are readily visible within either system when the Adjudications Officer is processing the case. While the system automatically returns IBIS security check information, it does not notify USCIS when the check is completed.

Although the results of these checks are automatically retrieved through the system, the FBI checks require Adjudications Officers to retrieve the data from a separate database. However, name checks which result in negative information on the applicant or beneficiary (commonly referred to as a “positive hit”) do have a notification vehicle and are immediately referred to specialized teams for further investigation or action.

When the application is transferred from one USCIS facility to another, FBI fingerprint Rap sheets are sometimes not received before shipment. If a fingerprint check expires before USCIS completes the adjudication, the applicant must have another set of fingerprints taken

³¹ The FBI’s IAFIS matches criminal history records from federal, military, and most state apprehensions. USCIS collects and electronically submits applicants’ fingerprints for selected benefits (i.e., naturalization, permanent residence, and asylum). IAFIS has been in place since 1999. Before that time, the Immigration and Naturalization Service (INS) manually submitted fingerprint cards for criminal history records checks. USCIS submitted 1.9 million fingerprints at a cost of \$31.9 million in FY 2004. The FBI Name Check is partially automated and searches over 86 million files documenting people who are the main subject or referenced in an FBI investigation. The legacy INS queried the main files since 1985 but added reference files to security checks in 2002.

³² IDENT enables agencies to screen fingerprints against several different database repositories. USCIS enrolls aliens applying for asylum in the IDENT-Asylum database, screening them against previously enrolled asylum applicants, the immigration lookout database of criminal aliens, and the immigration recidivist database of repeat immigration offenders. Asylum offices completed approximately 146,000 applications receiving this three part check in FY 2004. Asylum offices have used this system since 1998. Source: Office of Inspector General (Nov, 2005), *A Review of U.S. Citizenship and Immigration Services Alien Security Checks* (DHS-OIG Report No. 06-06).

³³ The CLAIMS 3 and 4 systems enable the Service Centers to provide automated support to process applications and/or petitions for benefits, determine the status of pending applications and petitions for benefits, and account for and control the receipt and disposition of any fees collected.

³⁴ Formerly known as the Treasury Enforcement Communications System, TECS is operated by CBP.



unless they have already been identified as an “Ident” case by the FBI. Since the FBI maintains these records, another criminal history can be generated and faxed to USCIS.³⁵

All records related to an IBIS check are printed and attached to the file and require a USCIS employee to stamp every hardcopy page of the TECS record to signify the nature of the information. However, some offices also use watermarks to eliminate the requirement to stamp each page. Since IBIS checks are valid for 180 days, USCIS district offices must manually track whether time has expired on a case. Positive information related to IBIS checks is documented on paper and the resolution is attached to the application.

FBI indices popular or “name checks” are initiated after USCIS inputs the data electronically and forwards it to the FBI. The request is associated with the application filed, rather than a unique identifier for the applicant, and USCIS is not automatically notified of name check results. USCIS must generate an inquiry to determine the status of a submitted name. Final results are printed and placed in the applicant’s file. In cases where the name check results in a “positive record,” USCIS must at times wait protracted periods for further information in order to resolve the hit.

4.3 Adjudicate

4.3.1 Review for Completeness, Eligibility, and Risk

USCIS conducts an initial review for completeness at the time of filing or just before an adjudication to ensure that documents required by statute or regulation have been sent to the agency. If all required initial documents are not submitted, a request for those documents is mailed to the applicant. Also, the adjudication officer may request additional evidence throughout the adjudication process.³⁶

During the adjudication process, the file will be reviewed to ensure that all background checks are completed, current, and resolved according to USCIS operating procedures. Adjudications Officers will then examine the evidence received to determine if the applicant is eligible for the benefit. While “risk” is formally assessed with some types of applications, a standard risk-based assessment does not currently exist for most adjudications. Identification of fraud, for example, relies heavily on the skills of the individual Adjudications Officer rather than a systematic, definable approach. When potential fraud or security issues are identified, cases are referred to a special fraud detection unit for additional analysis and subsequent referral to the U.S. Immigration and Customs Enforcement (ICE), if appropriate.

³⁵ By USCIS policy, FBI fingerprint checks are valid for 15 months.

³⁶ For numerous reasons, including the volume of such requests, mailed requests and returning documentation has sometimes been lost or not properly associated with the original application. In some instances, this has led to criticism of the agency or the issuance of a denial that must later be vacated and reopened in favor of a new decision based on discovered documentation.



4.3.2 Interview

USCIS schedules and conducts interviews as required by statute and policy. The purpose of these interviews is to obtain accurate and complete information from the applicant in order to determine the credibility of an individual's claim for a benefit.

The in-person interviews with customers are conducted at the USCIS field offices, requiring appointment scheduling across a vast array of offices within the United States. The Service Centers receive the majority of applications and schedule initial interviews for local offices, while field offices are responsible for the interview scheduling for applications that are received at the office and those that require rescheduling. As a result, numerous scheduling processes have developed within local offices, which use both manual and electronic means to create and notify customers for appointments at field offices and ASCs.³⁷ Appointments with local information officers are self-scheduled by customers using the web-based InfoPass system. InfoPass is a scheduling system that is accessed directly by the customer through the USCIS website. Customers can schedule appointments at field offices for various services provided by Information Officers, such as emergency filings, general information, and case status inquiries.

Given the reliance of USCIS on hard copy files to adjudicate cases, and that only limited data is manually entered in a system, A-Files must be delivered to the field offices prior to the scheduled interview. This has been problematic since some customers appear for interviews before the field office receives their paperwork. This occurs with enough frequency that offices have instituted local processes to verify that A-Files are on hand prior to scheduling an appointment.

4.3.3 Adjudicate

Adjudication is the process by which a USCI Adjudications Officer determines if a person is eligible for benefits under the Immigration and Nationality Act (INA). Adjudications are completed by a review of paper documentation submitted in support of an application or petition in coordination with the completion of security checks, and in some cases, an interview of the applicant.

USCIS Adjudications Officers must repeatedly and "manually" access numerous systems to determine the status of, or reinstate, various background checks in order to adjudicate a case. Not all case types have national Standard Operating Procedures (SOP) manuals, though many offices have established their own SOPs. While the Service Centers issue standard receipts, those are quite limited in function and flexibility, and national procedures or templates for the assembly of critical documents by Adjudications Officers (such as requests for evidence, notice of intent to deny, and notice of denial) are either not consistent or do not exist. The current systems do not use templates that can be merged with case data to produce

³⁷Initial interviews for permanent residence are typically scheduled through CLAIMS4. Additionally, face-to-face interviews also occur at Asylum offices, but the number of these facilities is significantly smaller and business processes tend to be more centralized.



documents. As a result, some offices have created “stand alone” correspondence systems to manage the use of local templates. While Field Operations is beginning to develop national templates, particularly as the number of Service Centers adjudicating certain types of cases are being narrowed from four to two, many officers continue to use locally developed templates.

4.4 Issue

4.4.1 Document, Certificate, Card

USCIS is responsible for the issuance of documents identifying status of persons within the U.S. While the majority of document production has been centralized through the Integrated Card Production System (ICPS),³⁸ some documents are still generated at district offices (e.g., travel documents and certificates of naturalization and citizenship). Data related to applicants is manually typed to Certificates of Citizenship. Both Certificates of Citizenship and Certificates of Naturalization require the manual attachment of photographs and placement of the DHS seal to overlay the photograph on the certificate. Lost photographs are not uncommon. When this occurs, candidates for citizenship are required to obtain new photographs.

As a result of the inconsistent issuance processes, numerous versions of authorization cards and travel documents are being issued across the country, regularly causing difficulties for customers when seeking employment, state government identification documents, or verification of identity at reentry into the U.S. Additionally, the antiquated technology utilized to produce USCIS identity documents presents an increased security risk because it is not tamper proof, and documents are easy to alter or reproduce fraudulently. Nor does USCIS have an “activation and deactivation” capability to provide document security, which is particularly problematic since lawful permanent resident cards and employment authorization cards are typically mailed through USPS regular mail from the card production facility to the alien’s last known address. No “in-person” interaction with a government agency or intermediary is required to receive the card, nor a process to verify receipt of the card.³⁹ Also, if an alien becomes ineligible to keep the card,⁴⁰ system entries to invalidate the status are not made in ways clearly designed to interrupt verified use of the card for employment or government benefits.

³⁸ ICPS can only be accessed through a CLAIMS3 interface. Until recently, district offices did not have access to CLAIMS3 and were required to submit all cases to services centers for update and card production. Today, district offices are allowed limited access to CLAIMS3 to facilitate card production, but their ability to connect CLAIMS3 has proven sporadic.

³⁹ Many businesses within the private sector business, such as those issuing credit cards, require a home phone verification of receipt of the card, etc.

⁴⁰ Examples of such ineligibility is when a permanent resident is ordered removed, an employment authorized adjustment applicant is sent a denial notice for the underlying adjustment application thus invalidating the employment, or an employer withdraws a nonimmigrant petition for an alien who has used it to enter on a visa and received an I-94 card permitting employment.



4.5 Cross-Functional Activities

4.5.1 Notifications

USCIS issues notifications to acknowledge receipt of applications and petitions, request information, to provide information related to adjudication, and to notify the customer of the decision rendered by the agency. It also issues Notices to Appear before the Executive Office for Immigration Review (EOIR).

USCIS currently has standard receipt notices that are generated through CLAIMS 3 and CLAIMS 4 and are used to acknowledge receipt of applications and petitions filed through lockboxes and Service Centers. However, because of the antiquated programming features of the system, USCIS has difficulty changing the notices if information contained in the templates becomes outdated. USCIS has been widely criticized regarding the confusing language in the standard notifications that are issued from CLAIMS 4. As a result, many districts favor locally developed notifications.

USCIS has a range of notifications from standardized electronically generated receipt notices to locally developed notification templates. Each field office and service center has created local templates for issuance of denial notices, requests for evidence, Notices to Appear, and approval notices. These locally developed notices have sometimes resulted in inconsistent and/or inaccurate decisions that have eventually led to legal action against USCIS.

4.5.2 USCIS Records

An A-File is the set of records USCIS maintains on individuals to document their immigration status and citizenship. These files exist as a paper set of documents. An A-File can contain anywhere from one page to hundreds of pages of documents and forms, such as benefits applications and petitions, supporting documents, photographs, notifications, memorandums of investigation, record of proceedings before administrative review boards, and third-party information related to violation of law. A-Files are typically used to:

- grant or deny immigration-related benefits,
- prosecute individuals who violate immigration law,
- provide immigrant statistics,
- collect information for use in USCIS research and policy analysis,
- control and account for records in compliance with the code of federal regulations,
- document chain of custody for enforcement, and
- certify the existence or nonexistence of records.

USCIS estimates that the agency has more than 55 million of these paper-based files, each of which constitutes a permanent record under NARA regulations. The agency spends approximately \$13 million each year transporting A-Files within USCIS and to other bureaus and agencies.

Today, USCIS manages applications both manually and electronically. The majority of cases are associated with a tracking number, and if needed they are accessible for the duration of



the established retention period.⁴¹ A few types of applications filed at local offices and do not have tracking numbers. Such files are stored by month of filing for a specified period, as defined by records operating procedures. Most applications have an associated A-File number or application tracking number. File location is currently maintained through two systems – the National File Tracking System (NFTS) and Receipt Alien File Accountability and Control System (RAFACS).⁴²

In some instances, files are not entered into these systems upon receipt or upon relocation. As a result, files cannot be located for significant periods of time or are categorized as “lost.” While temporary files are created when necessary, this new information is sometimes not consolidated when original files are relocated. Although the existing case management systems are designed to update file tracking systems whenever an Adjudications Officer transfers a file, sometimes these updates do not occur properly. If an applicant’s file cannot be located, the customer must resubmit an application and supporting documentation.

Additionally, when the application is for a non-immigrant benefit or the alien is outside the U.S., USCIS maintains paper records in files that are not maintained as “A-Files.” These records are not maintained in the immigration Central Index System (CIS) and as a result are not readily accessible. The files are coded according to the service center where the application was filed. In other instances, applications are stored according to date of filing without any electronic tracking mechanism for future reference.

4.5.3 Reporting

USCIS has been criticized for inadequate reporting, in part because the agency relies on a combination of automated and manual methods to generate statistical reports. USCIS does not have an automated system to track case decisions and associate them with a specific Adjudications Officer. Nor does USCIS have the capability to track and report on cases that are transferred from one location to another. Required reports are generated through “home grown” systems within field offices throughout the country. Beyond that, USCIS is utilizing NFTS and RAFACS to track and monitor cases by pending category (e.g., name check, rap sheet, visa regress). Individual production tracking is dependent upon manual input, frequently resulting in unreliable reporting figures.

4.5.4 Interfaces with other Agencies

USCIS is limited in its ability to electronically interface with other federal agencies. Data sharing arrangements occur through point-to-point interfaces, which require rebuilding whenever a participating system is modified.

Data sharing between federal agencies provides additional information on which USCIS can base adjudications and policy and information development. It also helps improve national

⁴¹ See USCIS Records Operations Handbook for retention periods.

⁴² RAFACS is in the process of being migrated into NFTS.



security by expanding access to critical terrorist watch lists. Systems currently available to USCIS are:

- Department of Labor (DOL): through the Labor Condition Application (LCA) database USCIS Adjudications Officers can view data related to companies hiring non-immigrants. However, data from the system is sometimes six months old. DOL also provides access to historical data for permanent workers hired by U.S. companies.
- DOS: through the Consular Consolidated Database (CCD) system, Adjudications Officers view visa application and issuance information collected through the Consular Affairs modernized systems.⁴³
- CBP: the Treasury Enforcement and Communications System (TECS) is the CBP master system that accesses several systems - IBIS, National Automated Immigration Lookout System (NAIIS) and the National Immigrant Information System (NIIS). TECS is used to check these systems via special queries and is accessible to Adjudications Officers via the USCIS Central Index System.
- ICE: the Deportable Alien Control System (DACCS) identifies those aliens who have been deported or are in proceeding; the system is accessible via the CIS.

⁴³ USCIS has agreed with DOS to share data from their respective case and file management systems, but the technological means for USCIS to provide that data remains limited since the most relevant information is currently stored within stove-piped mainframe systems.



5 DESCRIPTION OF THE NEW OPERATIONAL CONCEPT

5.1 Overview

The new USCIS operational concept will be based on a centralized, web-based solution designed to transform the USCIS business approach from a “transaction-centric” model to a “person-centric” model based on customer accounts. For individuals seeking benefits for themselves or derivatives and dependents, biometrics will be linked to an account to ensure unique identity.

5.1.1 Key Components

There are four components that represent the key features of the Transformation operational concept, supporting the operational capabilities identified in the USCIS Transformation Program Strategic Plan – Business Vision:

- Account-based Customer Management
- Paperless Adjudication
- Cohesive Analysis Environment
- Solid Performance Analytics

Account-based Customer Management represents the core technology, data tools, and processes required to create and present a single point of reference on specific customers. Under the proposed operational concept, USCIS will consolidate all information relating to individual customers under customer accounts supporting different types of interaction with the agency.⁴⁴ The use of accounts will enable Adjudications Officers to obtain a comprehensive view not only of information pertinent to a specific application or petition but of the entire history of the customer’s interaction with the agency, thereby facilitating and improving the decision making process.⁴⁵

The future operational concept makes provision for the management of the customer account environment to be performed by third party facilitators, able to support both account set up and subsequent transactions between USCIS and its customers in a manner that safeguards the privacy of customer records.

Paperless Adjudication is central to facilitating customer interaction with the agency, improving the agency work flow and improving the speed with which applications can be

⁴⁴ USCIS intends to leverage the DHS concept of unique identity and enumeration for the purpose of biometric verification. In those instances where the capture of biometrics is not an option, the agency is proposing to use another commonly accepted identifier (such as the FEIN) for the same purpose.

⁴⁵ Account based customer management draws on the Identify Customer, Apply for Benefits, Collect Fees, Assess Risk and Eligibility, Process and Adjudicate Requests and Applications, Communicate with Customers and Partner Agencies, and Manage Knowledge capabilities described in the USCIS Transformation Program Strategic Plan. Additionally, the common view facilitates appeals and error corrections processes.



adjudicated. The reengineering of the adjudications process will move the agency from a cumbersome, paper-based bureaucracy to a streamlined, paperless organization.⁴⁶

A **Cohesive Analysis Environment** links analytic resources and tools to enable coordinated and comprehensive assessments of individuals and agency operations.⁴⁷

Solid Performance Analytics make a unified approach to, and execution of both internal and customer facing capabilities possible by providing management with the foundation for ongoing process improvement and quality assurance.⁴⁸

As illustrated in Figure 5-1, USCIS plans to transform the currently fragmented environment into an integrated end-to-end adjudicative process providing a variety of benefits. Current processes will be transformed into an integrated set of services. All information related to an individual will be linked in a single account and available through a centrally managed secure information system thereby creating the transformed end-to-end adjudicative process.

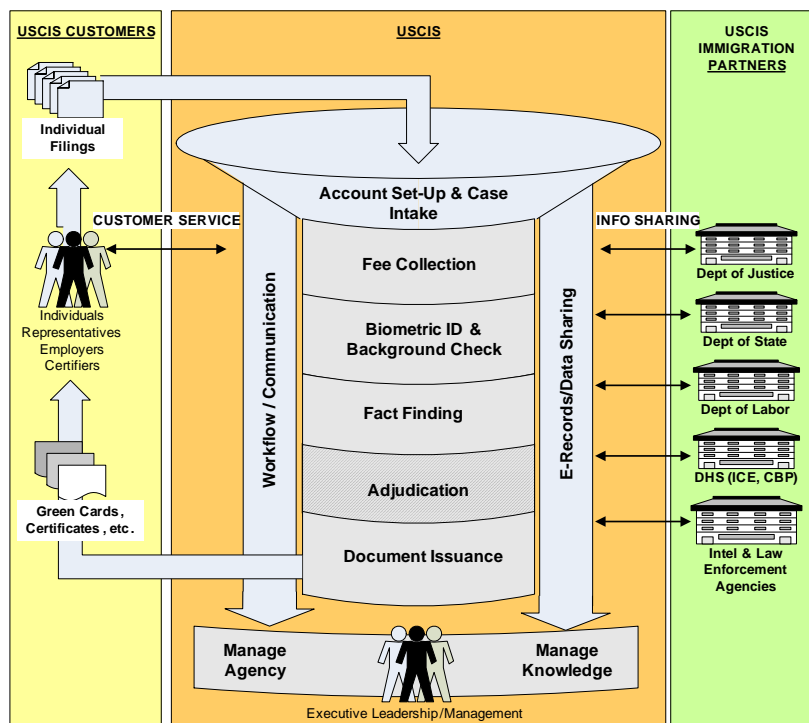


Figure 5-1: Proposed USCIS end-to-end Adjudicative Process

⁴⁶ Paperless adjudication incorporates the Apply for Benefits, Collect Fees, Assess Risk and Eligibility, Adjudicate Requests and Applications, Issue Documents, Communicate with Customers and Partner Agencies, and Manage Knowledge capabilities.

⁴⁷ The common view of specific and broad data combined with common risk models and understanding of data implications, provides a powerful toolset for the Manage Information, Knowledge and Intelligence, Assess Risk and Eligibility, Adjudicate Requests and Applications, and Manage Agency capabilities.

⁴⁸ In addition to supporting the Manage Agency capability, solid performance Analytics provide the basis for oversight confidence in the ability of the agency to meet its mission.



The Transformation Program will affect most aspects of USCIS operations and technology. USCIS operations will be transformed from a paper based process to an electronic environment, making it possible to incorporate more effective processing of low risk applicants and better identification of higher risk individuals.

The new operational concept will be designed around four major processes: 1) Account Set-up, 2) Case Intake, 3) Adjudication and 4) Document Issuance. The key characteristics of these processes include:

1. **Account Set-up:** To improve the management of information and communications between the customer and the agency, each customer will establish a customer account in the course of their first interaction with USCIS. This account will be referenced during all subsequent interactions.
2. **Case Intake:** USCIS will modernize and automate its intake process, including the collection of application data, fees, and supporting documentation. Web-enabled tools will allow customers to electronically submit all information pertaining to benefit requests. Payments will be electronically processed and linked to the customer's account.
3. **Adjudication:** USCIS will incorporate work flow, case management, and decision support tools to streamline adjudicative processes and improve the consistency of determinations.
4. **Document Issuance:** USCIS will improve the issuance of benefits documentation through the systemic retrieval of biometrics and enhanced document security features to mitigate fraud risks from forgery, document distribution, and lack of receipt verification.

5.1.2 Case Management

As indicated in Section 5.1.1, key to the new USCIS operational concept is an account based approach to customer interaction and processing of transactions.

Under the proposed operational concept, USCIS will consolidate and present to customers the transaction types that are available online, in light of the applicant's immigration status as identified by the inquirer or account holder. This leads to a set of services that are more quickly comprehensible to the customer, who needs to only consider the types of transactions appropriate for his or her immigration status. Similar to online banking or online reservations services, a customer will be able to review the different benefit types and then, after finding the desired benefit, will either log-in to an existing account or establish an initial account in pursuit of a particular benefit. Alternatively, the customer may log-in or establish an account and then select the benefit. Account holders will have the option of completing the transaction through a conversational-like dialogue or in a form field approach. In the online filing experience, the system will guide an account holder to provide the fields of information that are unique to the transaction and have not been previously provided and do not require updating.



Access to the solution will require a user name and password and will be determined by assigned roles and rights. An audit trail will provide a record for each user's interaction with the system, including user name, transaction date and time.

Additionally, the proposed operational concept accommodates the use of batch filing to complete customer transactions, using published standards. USCIS anticipates that batch filing will particularly attractive to employers and representatives.

All information and documentation submitted by customers is subject to verification by USCIS in accordance with applicable regulations.

5.1.2.1 Access to Information stored in other Systems

Depending on authorization, users will also be able to access information stored in other USCIS and DHS systems.

5.1.2.2 Security of Internal Use Only Transactions

Items that require a FOIA request for disclosure will be maintained in a manner that prevents such items (e.g., electronic notes and electronic/scanned documents identified as “for internal use only”) from being identified or accessed by the account holder. Scanned Adjudications Officer notes, marriage fraud video, and ICE Memorandums of Investigations are examples of information that would be maintained in such a manner, as well as notices from the Fraud Detection and National Security Division (FDNS) regarding the specific transaction or trends related to a transaction that require officer review.

5.1.2.3 Linking Legacy USCIS Transactions to Accounts

Legacy transactions, including digitized paper files, will be linked to accounts based on matches with customer provided data, such as A-Numbers and receipt numbers. Other legacy transactions will be linked to accounts based on matches with biographic data. Legacy transactions whose relation to the account is subject to question will need to be for data error or identity fraud.

5.1.2.4 Information Sharing with other Agencies

Subject to policy, the solution will be able to share information with systems belonging to other agencies to automatically provide data from those systems to the USCIS. For example, the solution should be able to pull from DOS’s CCD system⁴⁹ biometric and

⁴⁹ CCD stores all visa application and issuance information collected through the Consular Affairs modernized systems at approximately two hundred and thirty sites (or posts) worldwide. Information entered in the system at all posts is replicated to the CCD within five minutes of data entry. Consular Consolidated Database Interagency Web Portal (CCDI) provides access from a web browser through the Open Sources Information System (OSIS) network to a subset of the data in the CCD. The CCD has been in use for a small number of users from other agencies for the past few months.



biographic information arising from a visa application made by an account holder and to compare it to other biometrics and biographic data in the USCIS account. Other source agencies include US-VISIT, CBP, and ICE.

Subject to policy, the solution will automatically share USCIS account and transaction information with other agencies/entities. For example, USCIS information about a benefits application should be made available to DOS for issuance of a nonimmigrant visa. ICE should be able to access USCIS data for NTA issuance or other enforcement activity. CBP inspectors should have access to account and relevant transaction data concerning applicants for admission. Eventually, subject to policy, the solution will provide for an active information exchange, enabling, ICE and CBP officers and DOJ Immigration Judges, and DOS consulates to update USCIS customer accounts as appropriate and to upload documentation. The system should also exchange information with partner agency systems, such as the DOL's Employer Electronic Verification System (EEVS) and DOS's Immigrant Visa Allocation Management System (IVAMS).

5.1.3 Customer Accounts

Under the future operational concept, USCIS will establish customer accounts not only for individuals seeking to apply or petition for benefits but for anyone seeking to do business with the agency, including employers, representatives, and certifiers. The rights associated with accounts for customers who seek benefits compared to the rights of accounts for those providing support (such as certifiers and representatives) are 'role based;' and any implementation will be determined by the selected technical solution. However, from a conceptual point of view, it is helpful to discuss these differences in terms of customer-specific account types.

5.1.3.1 Accounts for Individuals

The individual account is the centerpiece of the new operational concept, replacing the current paper "A-File" record and the CIS record tied to each "A-Number." The essence of this account will be the combination of core biographic information and biometrics taken during account setup and tied to the customer's account.

All persons requesting benefits from USCIS will be required to establish an individual account. This will include United States citizens, lawful permanent residents, immigrants, non-immigrants, and other benefit-seekers. Individual accounts will also be established for other persons engaging in business with USCIS, e.g., persons acting on behalf of representatives or certifiers. For these persons, the use of biometrics has not been determined.

In the case of individuals seeking immigration benefits, the completion of an individual account requires identity and security-related information and linking the account to biometric identifiers. If required, an individual establishing an account within the U.S. will be given the opportunity to schedule a biometrics appointment. While the account holder may file a transaction or become the subject of a petition before the account is finalized, no transaction will be processed until the account is finalized. Although aliens abroad can



initiate account setup and may be the subject of approved petitions without biometrics, the system will note that the account is missing biometrics and that adjudication cannot be completed prior to biometric data capture, background check, and enumeration.⁵⁰

Additional information will be added to the individual account as transactions are filed, to ensure that the account holder is not overburdened by requests for repetitive information. Examples of such information are family relationships, residence history, work history, and educational history. The account holder will be notified when information from a transaction is being attached to the account. Data that is unique to the transaction, such as the job duties and terms of a sponsoring employer's offer of employment, will be maintained in the transaction record.

Family relationships among individual account holders will need to be established and updated for purposes of family sponsorship and derivation of immigration benefits.

Cornerstones of the individual account are the following:

1. **Identity:** information will be collected and maintained to establish the identity of persons and organizations seeking to do business with USCIS.

While not all customers will be required to submit biometrics, a key feature of the new operational model will be the use of biometrics to establish the unique identity of customers and thereby reduce the risk of fraud. Accordingly, the agency will use a combination of the individual's core information, supporting documentation and the person's biometrics to establish identity, tracked through an enumerator. The enumerator will be assigned once the person has been uniquely identified based on biometrics (finger prints), and will become the primary system key for all personal data.⁵¹ Additionally, because it is tied to the individual's biometrics, the use of the enumerator will enable transactions within other immigrant systems to be automatically linked and therefore provide the Government with the ability to obtain a person-centric view of that individual's interactions with USCIS and its partner agencies.⁵² As other federal agencies implement similar technologies, interoperability will be established so data can be shared between systems.

2. **Security:** information will be collected and maintained that will assist USCIS in conducting background checks on persons requesting immigration benefits. The agency will also use information that has been identified by the USCIS Fraud Detection and National Security Unit, ICE, CBP, FBI, and other federal law enforcement entities. Examples of this would be fingerprints and aliases used.

⁵⁰ At some point in the future, enumeration will take place based on the first time biometrics are captured by any of the immigration partner agencies. However, in the near future, individuals will be only enumerated based on the biometrics captured by USCIS.

⁵¹ In future, USCIS may employ additional biometrics, such as "iris scans," if they become standardized in DHS.

⁵² Ultimately, the use of the enumerator may also be adopted by other federal agencies, including CBP, ICE, DOS, and DOJ.



3. **Efficiency:** additional information will be collected and maintained, as opposed to being stored in records of transactions, to avoid duplicative requests for information and to prevent changes to personal information without explanation or justification. Once information is stored in the account, it will automatically be available for adjudicating future applications. Some types of information will not be collected, however, until it is required for a particular transaction. The account holder will be notified when information is added to an existing account and will be requested to verify its accuracy. USCIS will maintain a history of updates, such as employment history or educational background, provided by the account holder.
4. **Tracking and Interoperability:** records of immigration transactions about an individual, such as consular or USCIS petitions and applications, entries, exits, revocations, or enforcement encounters, will be linked to the account and be viewable by USCIS and other authorized government agencies involved in the immigration process. As a result, it will be possible to track, for example, an individual's association with a particular employer. Information in a customer's legacy A-File will not be formally linked to a new account unless an authorized officer confirms that the person is the same individual. However, transactions that occur before the ConOps is implemented will be retrievable based on a biometric match, A-Number identity, biographic parameter matching, and other criteria.

5.1.3.2 Accounts for Employers

Designed to complement the individual account, the accounts established for employers provide a consolidated record of any employer sponsoring foreign workers.⁵³ Employer accounts will be designed to accommodate different types of required information based on employer type (i.e., for-profit, non-profit, educational, and government entities). All persons and/or business entities acting as employers will be required to establish an account,⁵⁴

Employer accounts will require account management by an in order to ensure responsibility for overall account information and transactions. Such individuals will be assigned an individual customer account with role-specific rights. Account managers will be able to authorize additional agents to conduct transactions and will be notified by the system about each transaction.

Cornerstones of the employer account are the following:

1. **Identity:** information will be collected and maintained to establish the identity of the entity requesting immigration benefits with USCIS and of the managers and agents interacting with the agency on the employer's behalf. USCIS will use a combination of the Federal Employer Identification Number (assigned by the Internal Revenue

⁵³ Since an employer should be able to establish one account for purposes of sponsoring alien workers and for general employment verification, interoperability with the USCIS's Employer Verification System will also be explored prior to implementation of the system.

⁵⁴ This generally includes individuals, sole proprietorships, corporations, educational institutions, non-profit organizations, and religious organizations.



- Service and required for any petitioning employer),⁵⁵ core employer information and supporting documentation to establish identity upon initial contact with USCIS.
2. **Security:** information will be collected and maintained that will assist USCIS in detecting and deterring fraud related to employment within the United States. USCIS will use information that has been identified by FDNS, ICE, CBP, FBI and other federal law enforcement entities. To the extent allowed by law and participating agencies, the proposed operational concept anticipates a direct interface with DOS, the Internal Revenue Service (IRS), the Social Security Administration (SSA), DOL, DHS and other federal, state, or local law enforcement entities for the identification and prosecution of possible violations of the law. Examples of this would be wage information, Federal Employers Identification Number (FEIN), and W-4 information used to confirm that a company actually exists, does business, and employs other workers as represented in petitions to USCIS. Interfaces with private databases for information confirmation may also be used.
 3. **Administrative efficiency:** additional information will be collected and maintained to avoid duplicative requests for information. Once stored, it will be available in the adjudication of future transaction requests by an employer. Information will not be collected until it is required for a specific transaction, and the account holder will be notified that the information is being added into the account. The account holder will be requested to verify that the information is accurate, enabling the holder to make updates as appropriate. USCIS will maintain a history of updates provided by the account holder. Examples of this would be information about foreign ownership or foreign company affiliation that is repeatedly relevant to requests for investors or intra-company transferees.
 4. **Tracking:** all transactions by a particular employer will be viewable by Adjudications Officers to facilitate fraud analysis, compliance verification, and customer service. Associations with particular sponsored alien workers will be tracked and employers will be required to give notice of withdrawal of a petition or other filing when an alien's employment is terminated.

Relationships among companies will be tracked indirectly through FEINs, disclosed affiliations, managers and agents shared, employees sponsored, and representatives used. USCIS may explore the feasibility of allowing large companies to establish subsidiary accounts to be used by different divisions that prefer to manage their employment sponsorship separately.

5.1.3.3 Accounts for Representatives

The purpose of this type of account is to enable attorneys and representatives accredited by the Board of Immigration Appeals to conduct business with USCIS on behalf of customers

⁵⁵ A FEIN is a nine-digit number assigned to sole proprietors, corporations, partnerships, estates, trusts, and other entities for tax filing and reporting purposes.



seeking to obtain immigration benefits. Representative accounts will be based on individual representatives and not on institutional affiliation.⁵⁶ It is anticipated that representatives will generally interact with USCIS in an online environment. Consequently, the sections pertaining to representation are written with that perspective.

A representative whose client-authorized representation has been established will receive notifications about action on the relevant account (i.e., account update) or transaction (i.e., receipt, request for evidence, decision), including any change of representation. A representative will be able to give notice of his or her involvement by adding the representative account number to the transaction at the time of submission on behalf of individuals and employers. Represented parties will receive their own notices about account changes and transaction events, including addition, withdrawal or substitution of a representative. In addition, customers can add or remove representatives directly. Notification to account holders and their ability to make changes, rather than independent verification by USCIS, will be the means to ensure that representations are correct in the system. Other methods of routine verification would impose unnecessary burdens on customers and limit the flexibility that web-based interaction will afford.

5.1.3.4 Accounts for Certifiers

The certifier account will enable agencies and entities certifying information to USCIS in support of customer transactions, or as required by law. Examples of certifier account holders are civil surgeons who prepare medical reports, individual or entities licensed to prepare and submit home studies for orphan adoption cases, entities authorized to certify the substantive qualifications of health care workers, and medical providers confirming disabilities of applicants for naturalization examination waivers. Certifiers will establish their accounts online, or through application to USCIS, and will maintain these accounts online. They will submit their certifications directly to USCIS by reference to the account of the individual on whose behalf they are providing the certification account numbers rather than through the individuals needing a certification. Customers will receive automatic account notification of the receipt of a certification relating to them. As in the case of the employer account, the ability to conduct business and perform account management functions will be restricted based on user roles and assigned to holders of an individual customer account.

5.2 Account Setup and Management

Account setup, is a critical service that allows customers to establish an account with USCIS during their first interaction with the agency and includes the submission of an account setup fee. Under the new operational concept all customers conducting business with USCIS will be required to establish an account, including applicants, petitioners, employers, representatives, and certifiers.

⁵⁶ While others who assist an applicant in applying online, such as a notary, teacher, minister, friend etc, are required to identify themselves, they are not “representatives.”



Users will be able to open accounts, to maintain their accounts, and to submit and query transactions for benefits via the web, mail, or in person, in a manner that is user-friendly and easy to understand. Customers managing their accounts via the web will be provided simple instructions, definitions, and other useful sources of information throughout the process.

Accounts will be established based on the personal or business information and supporting documentation necessary for USCIS to identify and contact the account holders.⁵⁷ Customers will be asked to provide additional account information as it becomes relevant to transactions and will be able to update that information in the account, as opposed to providing it repeatedly to USCIS in separate transactions.

Upon completion of account set up, any existing records on the account holder will be retrieved and electronically linked to the account.⁵⁸ A record of any changes made in the account will be maintained for audit trail purposes.

Customers will be able easily to update contact information, such as changes of address. Since future transactions (such as a request for benefit) will be automatically linked to the existing account, there will be no need to re-enter contact information. Information previously placed in the account will be permanently stored and reused. The Government will benefit from both a 360° view of a customer's transaction and the ability to hold customers to one identity. Fraud and national security analysts will also be able to map relationships and patterns within the data to help detect and investigate matters of concern.

Certain features of customer accounts will be particularly useful for customers interacting with USCIS in an online environment. Account holders will be provided with user friendly access (such as through a Message Center) to notifications from USCIS arising from the account itself and from all transactions involving the account holder;⁵⁹ and account holders will be provided with a user friendly manner to send a message to, e.g. by selecting message types from a drop down menu of topics or a list of pending transactions.⁶⁰ Notifications from USCIS to the account holder will be clearly separated from messages by the account holder to USCIS. Examples of other types of interactive communications tools include a News Center in which USCIS can inform account holders of legislative, regulatory, or procedural changes related to the account, which may include a link to more complete information. The

⁵⁷ Customers working in a web environment will establish their accounts electronically. During account set-up, customers will be able to print out the questions for further review, even if answers were already submitted, and go back to edit previous responses. Customers will also be able to load images of supporting evidence for account information, such as identity documents, corporate charters and stock certificates.

⁵⁸ Upon transition from a paper based operating environment to a paperless operating environment, the role of records management will significantly change.

⁵⁹ Notifications to account holders (including to their representatives) should also be sent to the account holder's email address shown in the account record and sent by mail in predetermined situations as described in the section on Notifications. The account holder should be easily able to identify and distinguish between 1) all notifications sent, 2) the methods by which they were sent, and if appropriate 3) the representatives to whom they were also sent.

⁶⁰ In the event of email delivery failure, USCIS will rely on alternative contact information provided by the account holder. The account will be annotated to ensure that all communications failures are properly identified and tracked.



information posted to the account may be determined by the apparent status of the account holder.

Certain changes to the account and certain transactions will prompt the account holder to attach supporting documentation to the account or transaction record. Changes to the account based on a decision by USCIS, such as a link to a previous Alien Number, will be updated automatically and the account holder will be notified through a standard notification process.

Account holders will be able to review online all transactions submitted by or for them in a user friendly manner. The account holder will be able to “drill in” to a particular transaction in order to view more complete information and to conduct activity on the transaction such as uploading or downloading information or images, checking online case status, submitting inquiries, changing representatives, etc. The transaction status (e.g., received, pending receipt of payment or fee waiver decision, pending receipt of biometrics, assigned to Adjudications Officer, pending response to request for evidence or notice of intent to deny, pending background checks, pending interview, approved, denied) will be available for review online.⁶¹ The account holder will also be able to download or print attachments submitted to the account or to transactions.

5.2.1 Biometric Identification

After the account set-up is completed, account holders required to submit biometrics will be allowed to schedule a biometrics appointment at an ASC or other enroller. The enroller will verify the identity of the account holder, obtain biometrics, and link the biometrics and supporting biographic information to the account. Upon verification of the submitted biometrics against all other biometrics captured by DHS, the individual will be enumerated and assigned an Enumerator.

As other immigration agencies, particularly DOS and CBP, move to the 10 fingerprint standard and establish biometrics and enumeration interoperability with USCIS, the enrollment process conducted by those agencies should suffice for USCIS. At that point, full enrollment, including enumeration, will only be required once for all agencies with immigration and border management responsibilities, and subsequent biometrics checks, such as two finger scan, will be performed for identity confirmation, such as at USCIS interviews.

Subsequent to the capture of biometrics, authorized users will be able to:

- A. Validate identity against biometrics associated with the account.
- B. Access all FBI fingerprint results concerning the person account holder (including accessible legacy transactions clearly involving that person).

⁶¹ Authorized officers will have the capability to override certain transaction status notifications, such as not disclosing that background checks are pending.



- C. Resubmit fingerprint data to the FBI.
- D. Transmit the necessary data to card production systems when card production is required.
- E. Compare biometrics to other databases, including IDENT/US-VISIT, as available.⁶²
- F. Compare biographics associated with transactions involving comparable biographics with each other to confirm the same person.
- G. Obtain, store, retrieve, and share biometric data obtained through USCIS, CBP, ICE, and DOS databases, as well as other federal, state, and local databases (i.e., privatized enrollment services, state departments of motor vehicles).

Policy will dictate which categories of applicants may be exempt from fingerprinting.

5.2.2 Background Checks

Under the new operational concept, any background/security checks specified by USCIS may be initiated both manually and automatically (e.g., IBIS and FBI name and fingerprint checks), including any additional checks that may be established (such as nonproliferation screening performed by DOS within the Visa Mantis program).⁶³

When all the security checks have cleared, the system will automatically update the account, or otherwise release the account and/or its transactions for adjudication. While account holders may be advised that a transaction is pending completion of these background checks, account holders will not be allowed to view specific information.

When a security check indicates that potentially derogatory information exists, the transaction will be forwarded to a specialized unit, such as FDNS, for appropriate action. Upon resolution of the information, the results will be annotated in account and the case returned for completion.

5.3 Case Intake

For customers filing online, USCIS will consolidate and present to customers the transaction types that are available, in light of the applicant's immigration status as identified by the inquirer or account holder. This leads to a set of services that are more quickly

⁶² Similar to DOS and CBP, USCIS has stored its electronic fingerprints in US-VISIT and will need increasing ability to access that data for comparison with new enrollees, confirmation of identity of interviewees, and resubmission to the FBI. B2

⁶³ It is expected that IBIS checks will be conducted on every i-Account holder, and FBI fingerprint checks and FBI name checks on smaller subsets of applicant types as determined by USCIS. USCIS should be able to initiate checks both "manually" and automatically within set parameters. Examples of such automatic checks may be when biometrics are collected, 60 days after i-Account establishment when no biometrics are scheduled, 60 days after a biometrics appointment to which the applicant does not appear, upon filing of a case type for which biometrics are not required, and/or every 180 days after the previous check until decision. B2



comprehensible to the customer, who needs to only consider the types of transactions appropriate for his or her immigration status. Similar to online banking, a customer will be able to first review the available benefit options and then after finding the most appropriate benefit, the customer will either log in to an existing account or establish an initial account in pursuit of a particular benefit. Alternatively, the customer may log in or establish an account and then select the appropriate benefit. Account holders will have the option of completing the transaction through a conversational-like dialogue or in a form field approach. Additionally, customers will be able to batch file transactions with USCIS using published standards.

The account holder will also be able to attach supporting documentation to the account or to transactions in the form of digital images in formats identified by USCIS in compliance with National Archives and Records Administration (NARA) standards for electronic records (e.g., PDF with 300 dpi). Non-compliant transmissions will be automatically detected and rejected. The account holder will be able to submit new or updated information at any time prior to the adjudication. Upon receipt of updated information, the transaction will be automatically updated so that the Adjudications Officer can review the new information. All documentation submitted is subject to authentication in accordance with regulatory requirements.

Customers without access to the necessary automated tools will be able to submit applications, supporting documentation and fees in person or via mail, in which case the intake facility will convert the submitted information for use in the paperless adjudication environment and process fees on behalf of USCIS.

5.3.1 Representation during Transactions

Normally a representative will establish his or her representation of an individual or employer retaining the entity's services by self-identifying when submitting a transaction on behalf of the represented party. Additionally, representatives may subsequently add themselves to a transaction or substitute themselves for another representative (declaring that they have the client's permission to do so). Representatives may also withdraw from an account or transaction, in which case the represented customer and all other affected customers will be automatically notified and can make corrections. Similarly, represented customers will also be able to withdraw representatives from their accounts and transactions.

After the account relationship has been established, the representative will be notified of every action taken in relation to a represented account, to the same extent as the represented party is notified. Representatives will be able to upload documentation and download information and documentation relating to any account or transaction in which their representation has been entered. All transactions submitted by representatives are subject to verification in accordance with regulatory requirements to ensure that the account holder is authorized to represent the the customer identified in the transaction. The history of representation will be automatically tracked by transaction.



5.3.2 Fee Collection for Online Transactions

In the case of customers filing online, the required filing fee will be automatically calculated upon completion of a transaction. If the account holder is not ready to pay, the transaction can be saved for a predefined period as a draft transaction. Failure to pay within the predefined period will trigger a warning notification and then cancellation and deletion of the transaction. When account holders verify they are ready to pay, the user will be provided with the ability to pay online in a secure environment. After fee intake, the transaction will be automatically flagged to indicate that the required payment was received, and any discrepancies noted. The satisfactory remittance of the fee completes the filing of the transaction.

If account holders do not agree with the assessed fees, inquiries can be submitted to the agency.

5.3.3 Fee Waivers

Account holders will be able to request the waiver of applicable fees on any transaction. However, USCIS may designate some fees as not susceptible to waiver, such as the account set-up and biometric fees. Waivers will be granted subject to the submission by the account holder of supporting documentation to substantiate the waiver request. If the fee waiver is granted, the account holder will be notified and the transaction will proceed, including scheduling. If the fee waiver is denied, the account holder must submit the transaction with fee within a predefined period, with a warning notification built in, or the transaction will be canceled and deleted, with notice to the account holder.

5.4 Case Management

All account and transaction data are subject to verification by USCIS prior to processing, in accordance with regulatory requirements.

The account holder will be automatically notified when attachments to the transactions are required, whether for the account(s) or for the transaction itself, and provided with assistance in uploading these attachments. The account holder will have the option to submit the attachment(s) during the filing of the transaction or to submit the attachment(s) within a predefined period after submitting the transaction.

If the account holder chooses to submit the attachment(s) later, the account holder will be notified automatically that the transaction may be denied if attachments are not received within a predefined period. Any pending transaction will also be denied if the account holder fails to submit biometrics within a predefined period.

5.4.1 Acknowledging Transactions and Follow-up

Upon submitting the transaction, each account holder to whom the transaction applies will receive a notice containing relevant transaction and follow-up information.



5.4.2 Rejecting Transactions

In certain predetermined circumstances, transactions will be automatically rejected. For example:

- Filing a cap-subject H1B petition after the cap has been met;
- Untimely filing of an adjustment request; or
- An M-1 student filing for a change of status.

When a transaction is rejected, the account holder will be automatically notified with an explanation. In the case of individuals filing online, the account holder will be provided with the capability to override the rejection with an “insist on filing” feature, allowing the account holder to explain why the filing should not be rejected. If account holders file a transaction after using the override, they will be required to verify that they understand that they may not be eligible for the benefit sought and that the fee will not be refunded even if the benefit is denied. Transactions filed through the override feature will be immediately forwarded for review and action which may include denial, acceptance for further processing, or adjudication. All rejections and the reason for the rejection will be attached to the account for reference by both the account holder and USCIS personnel.

5.4.3 Counting Transactions

For management and oversight accountability purposes, all transactions will be automatically counted and sorted, distinguishing between various classifications and sub-classifications, including H-1B and H-2B.⁶⁴

5.4.4 Transaction Archive and Reactivation

Transactions will be stored for a predefined period under the account. As subsequent transactions are granted, previously closed transactions will be archived. Both USCIS and the account holder will be able to access and view an archived transaction. When an account has been inactive for a predetermined period, the account will be archived. Both USCIS and the account holder will be able to access and view the archived account. The account holder can submit an additional transaction, reactivating the account.

5.4.5 Workload Management

Individual field offices will have the capability to set the Adjudications Officer’s daily case assignments. Supervisors will be automatically alerted when an officer has a pending workload that is above authorized levels in order to enable the work to be redistributed as appropriate. Additionally, managers may electronically reassign cases among different officers and to accommodate schedule changes or role reassignments.

When a case has cleared intake, biometrics, background checks, and relevant scheduling services, it will be placed into a queue for assignment to an Adjudications Officer who will

⁶⁴ In some visa classifications, Congress has set numerical limitations or "caps" on how many visas can be issued during a fiscal year. The system should be able to track and monitor the caps by visa classification. USCIS Transformation Program ConOps, Version 1.5
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be able to draw down cases for adjudication. Transactions requiring interview, including cases later found to require an interview, will be directed to an appropriate field officer for interview. The system will set the interview at an appropriate and available time and place, and send a notice to the customer. Customers who did not schedule the interview at the time of case filing will be given a limited opportunity to schedule/reschedule an interview at the most convenient location.

5.4.6 Scheduling

The proposed operational model includes an integrated scheduling process to replace numerous scheduling processes used within USCIS. The scheduling process will accommodate at least five types of events:

1. Information Officer appointments at local offices, not necessarily related to a pending transaction;
2. Biometrics appointments at ASCs or other authorized enrollment services;
3. Adjustment of status interviews;
4. Naturalization interviews and oath ceremonies; and
5. Miscellaneous transaction interviews based on individualized referrals from Service Centers or other offices.

Events may be scheduled in three ways – automatic scheduling, self scheduling, and Adjudications Officer scheduling.

- A. Automatic scheduling or self-scheduling: Account holders will be able to choose automatic scheduling or to self-schedule appointments through a status request feature. Self-schedules can be initiated at the time of filing, within a predetermined period after filing, or within a predetermined period after USCIS sends notice of a required appointment. Self-schedules may be performed online, via phone, or in person. Additionally, an account holder may request that family members be scheduled together. Account holders may also cancel and reschedule an appointment.

All automatically scheduled appointments will be posted to the account(s) and a notice e-mailed and/or sent via mail.

- B. Adjudications Officer scheduling: Officers may schedule an account holder to appear for a personal interview at a field office or to submit biometrics at an ASC or other enrollment facility. Such schedule notifications will be provided to the customer electronically and/or via mail.

5.4.7 Performance Reporting

Under the future operating model, all performance reporting tools will be managed in an integrated manner, enabling management to access “real time” production data.



Management will be able to utilize a performance measurement system that identifies the relevant outcomes and other performance criteria to be addressed through the identification and selection of appropriate system features.

Reports will be a critical feature of the system. Since every transaction will be tracked, users will have access to a daily log of their activities. All statistical data will be captured and headquarters reporting requirements will supported.

The reporting capabilities provided by the solution will enable the generation of standard and ad hoc reports on any data element or combination of data elements across a given date range. Sample types of reports include:

- Number of transactions by type filed over any given date range by zip code, office jurisdiction, region, and nation-wide.
- Decisions by type made over any given date range by officer, unit, office, region and nation.
- Number of transactions in any category over a given date range, officer, office, region, and nation.
- Cases that are beyond predetermined timeframes by form type, officer, and office.
- Fee waivers, reason, and equivalent revenue.
- Computer time spent on transaction by USCIS from start to finish.
- Average national percentages on decision types, time per decision, and comparison to officer, unit, office.
- Number of visas issued by category.
- Unauthorized access attempts by USCIS personnel and the public.
- Number of status documents issued by type and category
- Number of status documents whose receipt has been verified
- Number of status documents returned to USCIS as 'not-delivered'

5.5 Adjudication

The Adjudication process begins with verification of information provided by the applicant related either to the benefit being requested or to basic qualifications under the Immigration and Nationality Act. The Adjudications Officer must ensure that the applicant meets all eligibility requirements and that certain statutory and security-related requirements are documented in the record. Upon making a decision, the officer must annotate the decision and issue the required documentation in support of the decision. For example, when an application is approved, the officer will issue an approval notice. When an application is denied, the officer must issue a denial notice that includes the appropriate appeal information.



5.5.1 Eligibility and Status Verification

Whenever possible, Adjudications Officers will be able to access other government systems to verify adjudicative information or evidence. As information technology platforms are developed within other agencies and organizations, the USCIS solution will be able to gather and/or verify such information as:

- DOL case numbers to verify Labor Certification Applications and Labor Condition Applications directly;
- Nonimmigrant visa information, including confirmation of biometrics, directly from the DOS CCD;
- Birth certificate number and biographic data to verify the account holder's birth certificate authenticity from vital records databases;
- FEIN to confirm that the employer has filed income tax returns with adjusted gross income, and wage withholding statements and payments, in keeping with representations to USCIS about the company;
- Educational data, such as a graduation date, diploma type, and biographic data from a school's database.

5.5.2 Paperless Adjudication

Under the proposed ConOps the current paper adjudication process will be replaced by a paperless adjudications process.

The Adjudications Officer will have access to transactions, all related accounts, and all associated documents, and be able to view the most relevant sets of account and transaction information on the same screen. The current manual adjudications process will be enhanced through the use of decision support tools with business rules to assist in the analysis of customer's profile and case history and partner agency data in order to flag potential fraud and high risk cases. The information will be displayed in a manner that facilitates the adjudication process (e.g., screen layout, tabs). In addition to account, transaction, and attached document tabs, the solution will also provide Adjudications Officers with direct links to:

- Associated Accounts: allowing the Adjudications Officer to review all associated accounts that relate to the account holder, such as the account of the petitioning spouse, derivative beneficiaries (i.e., spouse and children), employer, or representative.
- Associated Transactions: allowing the Adjudications Officer to review all transactions filed by the account holder, both pending and previously filed. A separate function will provide access to legacy system records and transactions that



- appear to relate to the account holder based on biometrics, alien number, or biographic matches.⁶⁵
- Internal Only Information: allowing the Adjudications Officer to review sensitive information, including Adjudications Officer notes and other information related to the account or transaction and not available to the public.
 - Background Checks: allowing the Adjudications Officer to review the results of background checks related to a transaction. The background checks tool will also alert the officer if there is classified information related to the account and if the adjudication can proceed or if special action is required. Classified information will only be available to employees with appropriate clearance.

The paperless adjudication process will match or exceed the current paper process in memorializing decisions. Upon review of the transaction, the Adjudications Officer can:

- A. Continue: The officer will have the ability to “continue” a case through a request to the account holder for additional information, complete additional review, or conduct additional background checks.⁶⁶ In this case, officer will issue the continuation notification (i.e., request for evidence or notice of intent to deny) and a due date for receiving the requested information. Depending on the mode of communication selected by the customer, the notification will either be posted electronically to the account or mailed. If the requested information is not attached to the transaction after a predetermined timeframe, the transaction will be automatically routed back to the officer. If additional information is received, the transaction will be automatically routed back to the officer for adjudication
- B. Refer: The Adjudications Officer may refer (reassign) the transaction to a supervisor, another officer, or a designated organizational entity such as FDNS, or to another agency such as DOS, for review and resolution of articulated suspicions or other security concerns. Similar to background checks, cases will be returned to the Adjudications Officer after resolution.
- C. Approve: The Adjudications Officer can approve the transaction. If the transaction is approved, an approval notification will be automatically created and posted to the account after review and edit by the officer. A typical approval notification template includes:
 1. Key account details;
 2. Transaction type;
 3. Approval date;
 4. Validity period;
 5. Other conditions and information related to the approved transaction; and

⁶⁵ Criteria for matching types of transactions, and other criteria for display of legacy records, will need to be developed.

⁶⁶ When a case can not be immediately adjudicated and for various reasons, such as requiring more supporting evidence or documentation from the customer, the case is held in abeyance and referred to as “continued.”



6. Subsequent action(s) required by USCIS or by the account holder (account holder's appearance at a local office, USCIS card production and mailing, etc.).

If the approval would result in the issuance of a document, an order will be automatically placed with the document production service. USCIS may choose to have the approval notice and card delivered together from the card production facility. Approvals may be set, by category, by random selection of a portion of cases decided by each Adjudications Officer, by request of the officer, or otherwise, for review by a supervisor or quality assurance analyst. When a transaction is identified for review, notifications and documents will not be issued until the supervisor or quality assurance analyst has completed the review and electronically annotated the transaction.

- D. Deny: The Adjudications Officer can deny the transaction. If the transaction is denied, a draft notification will be automatically generated for Adjudications Officer revision. A typical denial notification template would include:

1. Key account details;
2. Transaction type;
3. Date of denial;
4. Summary of the facts;
5. Applicable law and regulations;
6. Legal basis for the denial;
7. Discretionary basis for denial;
8. Appeal/motion rights available to the account holder; and
9. Subsequent action(s) to be taken by USCIS or by the account holder.

Denials may be subject to review by a supervisor or quality assurance analyst as determined by management. When a transaction is identified for denial review, notifications and documents will not be issued until the supervisor or quality assurance analyst has completed the review and electronically annotated the transaction.

- E. Reopen: The officer or supervisor can reopen a transaction and assign it to an officer to consider as a service motion or for revocation, rescission, approval or other action.

5.5.2.1 Notifications

Notifications will be built on standard templates, and all notices will bear the transaction number and the account number of the alien. Notices will be posted to the account and emailed and/or sent via mail or served in person, as appropriate. In cases where the customer is acting through a representative, the representative will be instructed to communicate with the represented party as required. Delivery failures will be annotated on the account and USCIS will attempt to contact the account holders using alternative the contact information provided by the customer. The Adjudicating Officer will be automatically notified when an



inquiry or response is submitted related to a notification. The issuance of a final notification or status document will end a transaction.

5.5.2.2 Electronic Resource Center

The solution will provide access to an electronic resource center for officers that will include links to authorities such as the following:

- INA, as amended;
- Title 8, 20 & 22 Code of Federal Regulations;
- Precedent and Administrative Decisions and Adopted Decisions (BIA and AAO);
- Federal Register notices and rules;
- Foreign Affairs Manual;
- Federal Court Decisions;
- Adjudicator's Field Manual; and
- USCIS policy memorandums.

The electronic resource center will provide context-specific access by transaction type as well as through an open query function.

5.6 Document Issuance

Upon approval of a transaction, Adjudications Officers will automatically issue a production order to the document production service to initiate production of the document. If documents also require biometrics, these will automatically be delivered to the card production service with the production request. At this time, temporary and permanent status identification documents include:⁶⁷

1. Employment Authorization Document;
2. Advance Parole Document;
3. Refugee Travel Document;
4. Reentry Permit;
5. Conditional Resident Card;
6. Permanent Resident Card;
7. Replacement I-94 Card;
8. Certificate of Naturalization; and
9. Certificate of Citizenship

⁶⁷ USCIS may make changes to the current array of documents. For instance, advance parole, currently printed on paper with photo imbedded, may instead become a card and in some cases (such adjustment of status) be combined with the employment card. Certificates of Naturalization and of Citizenship may become more ceremonial in nature and be complemented by a Citizenship Card that will serve for identity and travel purposes under the People Access Security Service (PASS) system as envisioned by the Western Hemisphere Travel Initiative (WHTI). USCIS may even transition to the issuance of one identity card good for the life cycle of an customer subject to the requirements of the INA.



5.6.1 Document Production

Upon issuance, a copy of the biometrics and data provided on the document will be maintained for the purpose of status and/or employment verification.

When there is a significant delay in document production, or if a document has been returned as undeliverable, the document production center will post communications to the account and notify the account holder, using alternative contact information as appropriate.

5.7 Operational Policies and Constraints

USCIS determines eligibility for immigration benefits under the INA, as amended. It is not expected that the implementation of the operational concept will require statutory changes. The future operational model will conform to existing law, regulations, policy, and procedure. Operational policies related to the future operational model will be identified for each section below. The policies identified do not necessarily exist in current regulation, policy, or procedure. Some of the policies identified may require revision or additions to existing regulation, policy, and procedure. USCIS expects to use public notice and comment for promulgation of a comprehensive set of new forms and some additional regulations to implement the new system.

5.7.1 Operational Policies

Implementation of the proposed operational concept is based on the uniform implementation of the policies identified in the following sections.

5.7.1.1 Policies for Account Setup and Case Intake

- A. All individuals and parties conducting business with USCIS will be required to open an account.
- B. Every USCIS customer will be issued an account number.
- C. Petitioners, applicants, dependents and derivatives will provide biometrics to USCIS before the completion of a transaction, unless not required for the type of transaction or exempt by law or policy.
- D. Account holders will be responsible for transmitting data and submitting documentation required for the account and transactions.
- E. There will be a fee required to establish an account.
- F. There will be one account per individual, employer or representative.
- G. Account holders will be able to submit transactions through batch mode.
- H. Account holders will be allowed to update account information.
- I. No account information or transaction can be deleted.



- J. Account holders can view, print, and retrieve account and transaction information and documentation that have been submitted on their behalf.

5.7.1.2 Policies for Paperless Adjudication

- A. The officer will electronically authenticate decisions through an electronic signature.
- B. Whenever possible, the electronic verification of information will replace the need for submitted documentation.

5.7.1.3 Policies for Notifications

- A. Electronic notifications will supplement or replace paper mailings, when appropriate.
- B. Decisions on benefits will be posted to the account.
- C. Accounts will reflect current status (or potentially even statuses) and authorizations of the account holder.

5.7.1.4 Policies for Legacy Systems Interfaces and Inter-agency Data Sharing

- A. The solution will provide “view only” access to legacy systems.
- B. The solution will enable other federal, state, and local government agencies and account holders to share or exchange information relating to accounts and transactions, including verification of information and provision of visa numbers.

5.7.2 Policy Constraints

Policy constraints are defined as policy limitations or dependencies that USCIS needs to address in order to fully implement the system. Policy constraints should not limit the development of future capabilities. Potential policy constraints have been identified as:

1. Agreements with other federal and state agencies have not been reached to facilitate the manner and type of information exchange.
2. Agreements with other federal agencies have not been reached relating to joint use forms and the discontinuation of the alien registration number and the use of paper based processes.



6 SUMMARY OF IMPACTS AND ORGANIZATIONAL GAINS

In order to meet USCIS objectives relating to national security, customer service, and administrative efficiency, USCIS plans to streamline all adjudication related activities into a single automated solution. This solution will ensure consistency across USCIS operations in relation to case intake, biometric (collection, storage, and retrieval), background checks, electronic adjudication, scheduling, and notifications.

6.1 Comparison of Current and Future States

Table 6-1 below provides a summary comparison of the changes to USCIS operations resulting from the implementation of this ConOps.

CURRENT STATE	FUTURE STATE
<ul style="list-style-type: none"> Applications, petitions and supporting documents are submitted by mail or electronically depending on where a customer lives and what a person is filing. 	<ul style="list-style-type: none"> Account set-up and case intake will be completed via mail, electronic submission (including batch filing) or in person.
<ul style="list-style-type: none"> Some applications are not tracked and monitored electronically. 	<ul style="list-style-type: none"> All transactions will be tracked and monitored through the system.
<ul style="list-style-type: none"> Applications and petitions are not always maintained in the paper file of the person. 	<ul style="list-style-type: none"> All transactions will be associated account of the customer and/or representative involved.
<ul style="list-style-type: none"> Applications, petitions, and A-Files are lost. 	<ul style="list-style-type: none"> All transaction and core personal information will be maintained electronically in one virtual location and backed up in accordance with DHS security requirements.
<ul style="list-style-type: none"> Support staff and contractors input data into USCIS systems. 	<ul style="list-style-type: none"> Data not submitted by the customer in electronic format will be entered at an application intake facility.
<ul style="list-style-type: none"> Scheduling is generated through various electronic and manual scheduling systems. 	<ul style="list-style-type: none"> All scheduling will occur using an integrated scheduling service.
<ul style="list-style-type: none"> Biometric information is associated with a specific application or petition. Customers have to submit biometrics multiple times. 	<ul style="list-style-type: none"> Biometric information will be associated with the account holder through a unique identifier. Account holders will only need to submit full biometrics one time and will provide limited biometrics in future encounters to confirm identity.
<ul style="list-style-type: none"> FBI fingerprint checks are not conducted on all persons filing for benefits. 	<ul style="list-style-type: none"> FBI fingerprint checks will be conducted on all non-exempt persons filing for benefits. Biometrics collected by CBP and DOS will be leveraged as soon as they can be linked to accounts.
<ul style="list-style-type: none"> USCIS must identify persons by information contained in file. 	<ul style="list-style-type: none"> USCIS will identify customers through account numbers.



CURRENT STATE	FUTURE STATE
<ul style="list-style-type: none"> • USCIS personnel must proactively check for background security clearances and must resolve the same “hit” each time a benefit is adjudicated. 	<ul style="list-style-type: none"> • The completed background checks will be automatically attached to the account, and “hit” resolution remain available for subsequent adjudications.
<ul style="list-style-type: none"> • Customers must rely on USCIS to update their personal information. 	<ul style="list-style-type: none"> • Account holders will be allowed to update personal information directly through their account.
<ul style="list-style-type: none"> • All official communication is through the mail. 	<ul style="list-style-type: none"> • USCIS can choose to use account postings and optional email as exclusive means of communication or as complement to paper notices.
<ul style="list-style-type: none"> • Reports are manually generated. 	<ul style="list-style-type: none"> • The solution will automatically generate certain reports and will facilitate additional reports.
<ul style="list-style-type: none"> • USCIS has limited electronic interfaces with other agencies to share data. 	<ul style="list-style-type: none"> • USCIS will have robust interfaces with partner agencies to share data while protecting security and privacy.
<ul style="list-style-type: none"> • Files have to be shipped several times in the course of adjudication. 	<ul style="list-style-type: none"> • All information related to transactions will be immediately available to all authorized users.
<ul style="list-style-type: none"> • USCIS fails to provide proper notification to attorneys and representatives. 	<ul style="list-style-type: none"> • Representatives will maintain accounts with contact information, and representation will be captured electronically and associated to each transaction, ensuring proper notification.
<ul style="list-style-type: none"> • Individual USCIS offices use different decision templates maintained by individual Adjudications Officers and across District Offices and Service Centers. 	<ul style="list-style-type: none"> • All USCIS components and Adjudications Officers will use standard decision templates.
<ul style="list-style-type: none"> • Information shared with other agencies is sometimes difficult to obtain, incomplete or not current. 	<ul style="list-style-type: none"> • Information shared will be timely, complete and accurate.

Table 6-1: Comparison of Current and Future State

6.2 Resource and Production Impacts

USCIS recognizes that it does not have adequate tracking and reporting mechanisms. As a result, the agency has not always been successful at forecasting resources, required fees, and holding employees accountable for minimum production standards. Given the unreliability of workforce and production data, forecasting the impact of the proposed operational concept on USCIS is difficult. Nonetheless, TPO should track and evaluate the following over a period of 3-5 years:

- Increased need for training of officers and support staff in the use of automation and automated tools.
- Incremental decrease in the need for data entry, mailroom, scheduling, and file maintenance personnel and associated renegotiation of contracts.



- Transition of records personnel from paper to electronic records management.
- Incremental shutdown of antiquated legacy systems such as RNACS, 3, and CLAIMS 4.
- Increased capability to utilize personnel at their duty station to meet workload fluctuations, regardless of location.
- Reduction in shipping/postage costs.
- Reduced processing times for transactions.
- Failures to appear/failures to respond to requests.
- Number of filed Motions to Reopen.
- Real time production tracking and reporting capability.
- Reduction of inquiries to the National Customer Service Center and district offices.
- Quality of adjudications

6.3 Organizational Gains

USCIS will experience significant organizational gains through the successful implementation of the proposed operational concept, which will result in enhanced national security, improved customer service, and operational efficiency.

6.3.1 National Security

Implementation of the proposed operational concept will enhance national security by:

- Establishing identity through a combination of verified information, biometrics, and an assigned enumerator in the i-Account.
- Completing required background checks before any benefit is adjudicated.
- Providing the capability to share information with other federal law enforcement and government entities quickly and efficiently.
- Implementing procedures to verify information in lieu of accepting submitted documentation.
- Providing the capability to store and retrieve biometric information.
- Providing a background check process that will automatically initiate and track background checks as required.
- Providing the capability to track and monitor every transaction associated with account holders for use in information and intelligence gathering.
- Providing the ability to capture and update information in real time to assist with law enforcement efforts.
- Providing the capability to ensure that information on prior visa status and occupations for employment-based permanent resident applicants and other employment-related visa holders is consistently entered into a tracking system, and will interface with other immigration tracking systems.
- Streamlining the process of issuing a NTA against aliens found ineligible within the U.S. and deportable.



6.3.2 Improved Customer Service

USCIS is committed to becoming a customer-focused innovator of benefits processing and an accurate source of immigration benefits related information to our customers and the American public. The proposed operational concept will improve customer service by:

- Establishing accounts through which account holders can electronically submit transactions, update information, view case status online, and submit inquiries to USCIS.
- Electronically tracking and monitoring every transaction filed.
- Eliminating lost paperwork.
- Providing for instantaneous updates to accounts and transactions.
- Eliminating redundant requests for information and documentation.
- Eliminating the need to make multiple trips to USCIS offices for information.
- Providing account holders with the ability to self-schedule, cancel, and reschedule certain appointments to fit their needs.
- Providing account holders with the flexibility to choose the USCIS location to fit their schedules.
- Communicating electronically with account holders regarding requests for information and decisions made on transactions.
- Providing the capability to share information with other benefit providing agencies.

6.3.3 Operational Efficiency

USCIS recognizes the need to accurately forecast the demand for our services, prevent future backlogs, and improve our fee revenue and resource allocation planning. The proposed operational concept will enable USCIS to reach operational efficiency by:

- Providing a solution that will electronically track and monitor revenue and transactions.
- Providing a solution that will ensure regulatory compliance in the management of fees.
- Providing and implementing the capability to produce management reports that are timely and accurate.
- Providing the capability to assess productivity and the subsequent effect on preventing future backlogs in relation to case intake, scheduling, and standardized notification.



- Providing the capability to assess the effects of technology improvements on staffing allocation plans, as USCIS identifies a decrease in the need for mailroom, data entry, and records management services.
- Enforcing standard electronic quality assurance.
- Providing the capability to assess feasibility and costs of USCIS operations by transaction type.
- Providing options to improve timeliness for implementing fee updates.
- Providing a resource center for employees to utilize while making decisions on benefits.
- Providing standard notifications.
- Providing a standardized review process for decisions.
- Demonstrating the benefits relating to digital storage of fingerprints, including the time and cost savings to the account holders.
- Providing a national performance measurement system for USCIS operations.
- Providing information that is readily accessible and useful for high-level policy development.
- Providing information that can be used for research and analysis to support program and policy analysis and evaluation and high-level policy development.

ACRONYMS

Acronym	Definition
A-File	Administrative file
AAO	Administrative Appeals Office
ASC	Application Support Center
B-Number	Biometric Number (Enumerator)
BBSS	Benefits Biometric Support System
BCS	Background Check Service
BIA	Board of Immigration Appeals
BSS	Biometric Storage System
CBP	Customs & Border Protection
CCD	Consular Consolidated Database
CCDI	Consular Consolidated Database Interagency Web Portal
CIS	Central Index System
CLAIMS	Computer Linked Application Information Management System
ConOps	Concept of Operations
CSC	California Service Center
DACS	Deportable Alien Control System
DHS	Department of Homeland Security
DO	District Office
DOJ	Department of Justice
DOL	Department of Labor
DOS	Department of State
Dpi	Dots per Inch
EA	Enterprise Architecture
EEVS	Employer Electronic Verification System
EOIR	Executive Office for Immigration Review
FBI	Federal Bureau of Investigation
FDNS	Fraud Detection National Security
FEIN	Federal Employers Identification Number
FIPS	Freedom of Information Processing System
FOIA	Freedom of Information Act
FY	Fiscal Year
GAO	General Accounting Office
I-485	Application to register permanent residence or adjust status
IAFIS	Integrated Automated Fingerprint Identification System
IBIS	Interagency Border Inspection System
ICE	Immigration and Customs Enforcement
ICPS	Integrated Card Production System
IDENT	Automated Biometric Identification System
INA	Immigration and Naturalization Act



Acronym	Definition
INS	Immigration and Naturalization Service
IRS	Internal Revenue Service
ISD	Immigration Services Division
IT	Information Technology
IVAMS	Immigrant Visa Allocation Management System
LCA	Labor Condition Application
MFAS	Marriage Fraud Amendment System
NACARA	Nicaraguan Adjustment and Central American Relief Act
NAILS	National Automated Immigration Lookout System
NARA	National Archives and Records Administration
NBC	National Benefits Center
NCSC	National Customer Service Center
NFTS	National File Tracking System
NIIS	Non-immigrant Information System
NRC	National Records Center
NSC	Nebraska Service Center
NTA	Notice to Appear
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OSIS	Open Sources Information System
PASS	People Access Security Service
PDF	Portable Document Format, a standard file format for mixed-mode image and text data invented by ADOBE
RAFACS	Receipt Alien File Accountability and Control System
RAPS	Refugee Asylum Processing System
RNACS	Reengineered Naturalization Application Casework System
SEVIS	Student and Exchange Visitor Information System
SEVP	Student and Exchange Visitor Program
SNAP	Scheduling Notification for Applicant Processing System
SOP	Standard Operating Procedure
SRTM	Service Request Management Tool
SSA	Social Security Administration
TECS	Treasury Enforcement Computer System
TPO	Transformation Program Office
TSC	Texas Service Center
TWP	Temporary Worker Program
U.S.	United States of America
USCIS	United States Citizenship and Immigration Services



Acronym	Definition
VIS	Verification Information System
VSC	Vermont Service Center
WHTI	Western Hemisphere Travel Initiative
XML	Extensible Markup Language, a standard for exchanging text data between database systems