

**USCIS Responses to CISO Recommendations
CIS Ombudsman Annual Report 2007
January 2008**

CISO Recommendation AR 2007 – 01
<p>The Ombudsman recommends that the Transformation Program Office:</p> <p>(1) Publish transformation timelines, goals, and regular updates on the public USCIS website. The Ombudsman is concerned that transformation is proceeding largely without input from customers, Congress, and the public. The lack of transparency enables USCIS to modify deadlines and goals without producing meaningful results.</p> <p>(2) Establish transparency as a goal for USCIS processing and services. The agency provides minimal information to customers who often have long pending applications and petitions. The agency could make its processes more transparent, which would reduce inquiries to the National Customer Service Center (NCSC) and the need for INFOPASS appointments, as well as make available USCIS resources for adjudicative functions.</p>
USICS Response
<p>The USCIS Transformation Program Office (TPO) has conducted and will continue to conduct significant outreach to its customers, the public at large, the vendor community, Congress, the Office of Management and Budget (OMB), Department of Homeland Security (DHS) leadership, and staff from across all USCIS components. Through these meetings, the TPO receives input that helps USCIS refine the TPO's goals and the strategies for meeting them. The TPO has published the Transformation Concept of Operations (CONOPS), which describes the end-state of a transformed USCIS, and has made this document available to the public via the USCIS website.</p> <p>The TPO is currently in the acquisition process for the Solutions Architect and Program Management Office support. As such, it cannot publish material that is procurement sensitive. Once the acquisitions are completed in the winter of 2007, the TPO will begin making details and timelines available to the public.</p> <p>Providing accurate and timely information to its customers continues to be a long-standing goal of USCIS. Current processes and systems were not designed to provide the types of information customers need. In the new transformed environment, however, customers will be better able to understand the process and more easily monitor the status of their cases. There are a number of foundational technologies and business processes that need to be developed or modified to provide information that is more current. Developing and implementing these technologies and processes will take significant time and effort, but USCIS is confident that achieving this type of transparency will improve customer service and operational efficiency.</p>

CISO Recommendation AR 2007 – 02

The Ombudsman has observed that newer cases are processed more quickly while cases more than 6 months old are increasingly backlogged. The Ombudsman supports the USCIS drive to maximize case completions, but attention needs to be directed at clearing older cases.

The Ombudsman recommends that USCIS provide a clearer picture of the current backlog by providing information on the number of pending cases by form type with receipts that are: (1) less than 90 days; (2) less than 180 days; (3) less than 1 year; (4) less than 2 years; (5) less than 3 years; (6) less than 4 years; and (7) greater than 4 years.

USICS Response

USCIS began using “aging reports” during the backlog elimination period and continues to rely on aging reports for work prioritization and work distribution. Currently, aging reports are helping to identify and prioritize abeyance cases and to schedule interviews as needed. These aging reports are an integral part of the adjudication process.

USCIS agrees that it would be useful to track and report cases based on the actual processing age of each case rather than on statistical averages, and that continues to be a goal of the new case processing system being developed as part of the agency’s Transformation Initiative.

CISO Recommendation AR 2007 – 03

Currently, USCIS provides processing times based on agency goals, rather than actual processing time as it previously provided. In addition to the agency’s responsibility to be transparent, green card applicants in particular should know if applications will be processed within 90 days, rather than the 180-day target time, to avoid applying unnecessarily for interim benefits. The Ombudsman recommends that USCIS return to providing the public with actual processing times for each field office.

CIS Response

USCIS understands CISO’s concern with the posted processing times. However, USCIS is committed to setting appropriate expectations for its customers. Occasionally processing times for some applications in some offices may be faster than the agency goal. Unless these shorter processing times remain constant for a period of time, it would be inappropriate for USCIS to report those times. If a particular office shows a consistently shorter processing time over several months, and believes it can sustain it, then USCIS will take this recommendation into consideration and post the revised processing time.

CISO Recommendation AR 2007 -- 04

The Ombudsman recommends that USCIS adopt the frequently asked questions format used by Customs and Border Protection (CBP), incorporating a dynamic search feature on the website, rather than a static FAQ list. In addition, USCIS should provide a service on the website whereby customers can email a question and receive an answer within a short period of time.

USCIS Response

USCIS's website currently offers a search capability. In addition, the USCIS National Customer Service Center (NCSC) offers a sophisticated 1-800 phone inquiry system with two tiers of live assistance to accept questions and to provide response from customers.

USCIS Information and Customer Service will work closely with the Transformation Program Office and the USCIS Office of Communications to collaborate on enhancing the availability of information through the USCIS website, including improvements in the search function for the wide array of information now available.

CISO Recommendation AR 2007 -- 05

The Ombudsman further recommends that USCIS adopt a national process similar to that in the San Diego Field Office wherein an applicant who has not received a decision after an interview can contact the District Adjudications Officer (DAO) via email. If the DAO fails to respond within a set period of time, the applicant should be able to contact the supervisor. If there is still no response, the applicant should be able to contact the District Director.

USCIS Response

The National Customer Service Center currently provides an avenue for applicant follow-up via individual phone inquiry and the Service Request Management Tool (SRMT). Specifically, for phone inquiries involving case status that cannot be answered by Tier 2 database reviews, the Immigration Information Officers (IIOs) at Tier 2 will create a service request in SRMT. The service request will be forwarded to the appropriate adjudicating office for action and/or direct response to the customer.

USCIS plans to expand e-mail inquiries on a limited basis as an interim solution, and the Information and Customer Service (ICS) Division is working to create an e-mail mechanism for applicant follow-up after completion of an interview.

As a long-term solution, the agency is continuing work on an ICS initiative to permit online referrals from customers using the SRMT. This tool will employ appropriate screening to distinguish the types of referrals that are suitable for the online handling from those referrals that require live operator intervention.

CISO Recommendation AR 2007 -- 06

In addition to the Ombudsman's recommendation in the 2006 Annual Report, AR 2006 -04, the Ombudsman recommends that USCIS: (1) evaluate the value of the name check in its current format and establish a risk-based approach to screening for national security concerns; (2) work with the FBI to provide the necessary resources to perform name checks in a timely manner; and (3) provide greater transparency to customers by publishing monthly the number of long-pending FBI name check cases.

USCIS Response

USCIS recognizes the impact of the current name check process. While the agency will not approve a case unless all appropriate background checks are favorably resolved, USCIS understands the need to make improvements in this process. The Department of Homeland Security and the Department of Justice are engaged at the highest levels in examining the National Name Check Program (NNCP) to improve both the effectiveness and efficiency of the process. In June 2007, USCIS and the FBI undertook a pilot project to test a variety of approaches to improve the quality of information developed through the name-check process for use in the adjudications process. On October 5, 2007, DHS, USCIS, and the FBI signed a memorandum of agreement that sharpens the focus of the name-check process on the most productive FBI files, while encouraging fuller interaction between the two agencies in the NNCP and other venues.

USCIS and the FBI have both dedicated substantial funding to the FBI in FY07 and FY08 for additional contract staff who are being dedicated full time to the USCIS pending name-check caseload. The FBI has initiated a new study of its name-check process by an outside contractor to identify additional opportunities for efficiency gains. USCIS and FBI staff are in continuing dialogue on additional measures to improve the efficiency and effectiveness of the name-check process. These steps include placement of USCIS officers at NNCP facilities to work with FBI analysts to furnish information pertinent to USCIS adjudication.

Through revisions to the name-check search criteria introduced via the MOA, both the FBI and USCIS anticipate significant reductions in the pending caseload and a sustained, sharper focus in the name-check process resulting in fewer long-term, pending cases. USCIS has briefed the CISO on several occasions regarding the full scope of FBI-USCIS cooperation under the MOA.

The third recommendation (providing monthly totals of long-pending name-check cases) has been implemented. Pertinent data is being shared and discussed with concerned agencies.

CISO Recommendation AR 2007 -- 07

The Ombudsman recommends that USCIS conduct a thorough, transparent, and independent analysis of premium processing costs as compared with regular processing. The Ombudsman recommends that this process include a comparison for each stage of these processes for: (1) contractor costs; (2) federal employee costs; and (3) all other associated costs.

USCIS Response

USCIS will conduct the recommended review. In addition, we look forward to receiving from the Ombudsman any detailed qualitative and/or quantitative information relating to this recommendation.

CISO Recommendation AR 2007 -- 08
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The Ombudsman recommends that USCIS institute same-day fraud interviews in all field offices. Timely adjudication of applications will deny fraud perpetrators additional preparation time and timely decisions will prevent issuance of interim benefits.

USCIS Response

USCIS believes that same-day fraud interviews are beneficial, and while not a requirement, same-day fraud interviews are already taking place at many USCIS field offices. Improvements in pre-interview case analysis will allow the agency to focus on fraud issues during the interview. The majority of fraud found during the interview process relates to marriage-based petitions, which are the specific fraud interviews referenced in the Ombudsman's report. If the adjudicator suspects fraud during the course of an interview, the adjudicator can separate the petitioner and beneficiary and conduct separate individual in-depth interviews. Predicting how many cases per day will require more extensive interviews is difficult and scheduling long interviews for all cases unnecessarily decreases productivity. USCIS has found that rescheduling an interview where fraud is suspected to allow USCIS to conduct a site visit can also detect and prevent fraud.
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CISO Recommendation AR 2007 -- 09
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The Ombudsman recommends that USCIS produce an Aging Report on pending fraud investigations by officer and district. There should be a reasonable limit to the time allotted for investigation by the fraud unit.
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USCIS Response

USCIS agrees that managing this workload requires a certain level of inventory control, production reports, and associated analysis of operations. USCIS does not support placing limits on the time allotted for investigations. Every fraud investigation is unique and can involve hundreds, if not thousands, of petitions or applications. Many investigations require close coordination with multiple agencies (including overseas components), extensive interviews, and in-depth database and file reviews. Furthermore, cases accepted for criminal investigation are under the control of other organizations. USCIS is committed to managing its fraud investigation workload in a way that ensures it is operating in an efficient and effective manner.

CISO Recommendation AR 2007 -- 10

The Ombudsman strongly endorses a plan whereby employees responsible for quality assurance at the local level receive uniform and comprehensive training in QA procedures.

USCIS Response

The current quality assurance training curriculum is focused on the Quality Assurance Handbook, Naturalization Quality Procedures (NQP), policy memoranda, local standard operating procedures, and several self-study courses available through the Training and Career Development Division website, "EDvantage."

The Quality Management Branch has been tasked with implementing an improved quality program. An integral part of the enhanced program will be the formation of a Quality Advisory Group, which will be responsible for revising existing quality assurance reviews, developing new reviews, and assisting in the management of the Quality Management Program.

USCIS recognizes that a more standardized training approach is needed for Quality Analysts in the field. A priority for the Quality Advisory Group is to develop an enhanced uniform training program that will provide classroom training, additional e-learning opportunities, and standard operating procedures to all quality assurance reviewers.

CISO Recommendation AR 2007 -- 11

For the Chicago Lockbox, the Ombudsman recommends that USCIS:

- (1) Implement a procedure so the Lockbox will not accept a new filing if a case already has been denied and a Notice to Appear (NTA) issued;**
- (2) Institute a process to notify a field office when an application is rejected; and**
- (3) Implement quality review measures to ensure that errors do not occur in mailings to applicants.**

USCIS Response

USCIS will work with the Executive Office for Immigration Review (EOIR) to establish appropriate procedures for filings where an NTA has been filed.

Case information including reason for rejection is uploaded into CLAIMS 3, which can be accessed by USCIS offices. In addition, USCIS offices may contact the Lockbox through established procedures if there is a need to examine more specific reasons why a particular application was rejected.

USCIS Lockbox operations will continue its ongoing quality assurance process with respect to outgoing mailings to ensure that errors do not occur in mailings to applicants.

CISO Recommendation AR 2007 -- 12

USCIS currently uses substantial resources to issue and review RFEs for information that already was submitted or was unclear in the original application instructions. While the agency in its 2006 Annual Report Response (at p. 17) indicates that it continues to work to improve the clarity of form instructions, the Ombudsman recommends that USCIS develop:

- (1) Clearer application instructions so that applicants provide the required documentation at the outset;**
- (2) Transparent and easily understandable rejection criteria; and**
- (3) RFEs written in simple, more direct language with less legalese and personalized to the recipient for the limited instances in which RFEs would be issued.**

USCIS Response

USCIS Information and Customer Service (ICS) Division has restructured and focused its Content Team to include reviews of all form instructions and other public documents available through the USCIS web site to improve consistency and clarity. The ICS Content Team will work closely with the other components of Domestic Operations, which share the responsibility for benefit forms development and adjudication instructions, to collaboratively develop more consistent, plain-English instructions.

CISO Recommendation AR 2007 -- 13

The Ombudsman recommends that the USCIS budget for each headquarters element include sufficient funds for detailed visits with field office and service center line and supervisory staff to enable headquarters to better understand the needs of these offices.

USCIS Response

The USCIS Office of the Chief Financial Officer, Budget Division, has established a formalized process for determining the allocation of financial resources to support the successful achievement of agency's goals and priorities. This process involves the development of an integrated Annual Operating Plan (AOP) in concert with an Annual Performance Plan. As part of the AOP process, USCIS Headquarters and field offices are allocated certain amounts of discretionary operation expense funding to support operational activities such as business travel, employee training, and purchase of supplies and materials. The Budget Division seeks to develop the AOP in a manner that maximizes the utility of all available resources by ensuring that resource allocations are targeted to the areas of highest priority and strategic value. Moreover, the AOP process ensures that a reasonable amount of flexibility is provided to HQ program offices to allow staff officers ample opportunity to visit field offices and learn of issues and concerns that may exist in the field.

CISO Recommendation AR 2007 -- 14

The Ombudsman recommends that USCIS define a program to ensure proper handling and monitoring of its records. The program should be assigned to a USCIS headquarters office element.

USCIS Response

The USCIS Headquarters Office of Records Services (ORS) within the National Security and Records Verification Directorate is responsible for providing timely access to paper and electronic records for its customers in the benefit and enforcement communities. The ORS's Electronic Records Branch maintains the National File Tracking System (NFTS), which is deployed at most USCIS domestic and foreign sites and is responsible for identifying the location and movement of USCIS Alien Files. Additionally, ORS is responsible for the maintenance and usage of USCIS microfilm, microfiche, and digitized files, and develops USCIS records management policy for the monitoring, movement, and handling of these records.

With regard to file movement among DHS components, ORS has a proactive policy to improve communication and Alien File accountability with ICE and CBP. ORS has designated a liaison who meets regularly with ICE and CBP counterparts and arranges for training ICE and CBP personnel on ORS policies and procedures. ORS is also working with ICE and CBP to have these agencies' offices become official files control offices (responsible for A-Files in their possession) with full access to the NFTS. In a recent effort to obtain feedback from ICE and CBP personnel on records practices, ORS worked with the DHS Records Officer and developed an NFTS survey that was broadcast to all ICE, CBP and USCIS personnel. ORS is currently in the process of analyzing the results from that survey. ORS is also working with DOS to grant that agency access to NFTS and USCIS in support of our data share initiative. ORS is currently engaged with its customers in a major effort to digitize A-Files as a means of ensuring quick, broad, concurrent access to users, while reducing the inefficiencies of handling paper. As part of this effort, ORS is working with ICE and CBP to develop and implement a "scan-on-demand" program. It will focus initially on responding to ICE and CBP file requests by providing digitized A-Files to the requester's desktop, rather than shipping the paper file."

CISO Recommendation AR 2007 – 15

The Ombudsman also recommends that USCIS:
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| <ul style="list-style-type: none">(1) Ensure that a computer refresh does not adversely impact local systems;(2) Make available to each local office software that is authorized to enable offices to continue to use previously created documents in those systems; and(3) Consider a long-term solution to the onsite support issue such as a central system. |
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USCIS Response

<p>(1) All USCIS national systems are developed in compliance with the Federal Information Security Management Act (FISMA), the Privacy Act, and current DHS management directives surrounding Information Technology (IT) security. These national systems are carefully evaluated and managed through all system upgrades or technology refreshes. However, a legacy of locally developed systems currently exists throughout USCIS offices, and it is these local systems that are sometimes affected by changes to the USCIS infrastructure in preparation for the Transformation effort or to correct IT security and privacy weaknesses. USCIS is managing a very careful balance between maintaining these locally developed systems upon which local business practices are based, and placing an aggressive and rapid emphasis on improving the IT security posture and safeguarding the privacy information of its customers.</p>

<p>(2) Documents or data that are created in systems that are in compliance with FISMA, the Privacy Act, and DHS IT management directives are normally provided with migration strategies when new technology is introduced into the USCIS IT infrastructure. Some locally developed systems that were created without adequate IT security or privacy safeguards are affected when necessary modifications to IT security are implemented. Despite their impact on local systems, these improvements to the USCIS infrastructure are essential to eliminate flaws in the IT security posture. A review of the cost of a dedicated systems development effort to correct the IT security flaws of the local system, the availability of funds for the locally developed system, and the potential for widespread implementation of the system are all considered when evaluating the value of the system. Systems that are developed in absence of due consideration for IT security are frequently cost-prohibitive for the local office to correct, and are so locally focused that agency-wide use and implementation of each system is also prohibitive.</p>
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<p>(3) USCIS agrees with this recommendation and notes that the enhanced funding from the recent fee increase provides for a viable central IT program to begin to provide responsive service and better IT controls around the type of systems and the viability of the IT security posture and privacy safeguards being implemented.</p>
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CISO Recommendation AR 2007 – 16

The Ombudsman recommends that the Chief Human Capital Officer have a rank position equal to the Chief Information Officer and Chief Financial Officer. USCIS should establish the role as a career reserved SES position.
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USCIS Response

USCIS leadership has made it a priority to increase SES staffing, and the agency will continue to work towards this goal. Should additional career SES positions become available for this purpose, USCIS will consider placing an SES position as the agency's Chief Human Capital Officer.

CISO Recommendation AR 2007 – 17

The Ombudsman recommends that USCIS ensure there is a comprehensive merger of core job career paths with necessary training requirements – mandatory, technical, and leadership – oriented to future needs and groups, as well as transparency from entry to executive levels.

USCIS Response

USCIS appointed an internal working group to conduct an intensive study of the duties and responsibilities relative to Domestic Operations field offices. As a result of the information and data collected through site visits, focus groups, interviews with managers and employees, as well as the review of existing position descriptions, duties, and responsibilities, USCIS developed a new series of positions that combined numerous positions at the various levels of responsibility from GS-5 through GS-13. Each career series includes an assistant role and three levels of ability which are directly tied to the responsibility at each level. The following three career paths are being proposed: Administration, Analysis, and Adjudications

These new series create a more flexible workforce that will allow USCIS to operate efficiently, be prepared to meet changes in workload demands, and provide for greater consistency in training and developing the work staff to perform the mission of the agency. Additionally, the blended series provides for a clear line of site from entry-level to full performance whereby high performers can map out career paths.

Equally important, USCIS has developed a new Immigration Officer Corps training program, BASIC, that expands the new officer training from 6 to 10 weeks and provides hands-on operational learning. In addition to enhancing the basic training program for new officers, a continual learning program is being expanded to provide for ongoing career growth of the current Officer Corps.

USCIS has implemented a number of leadership programs that are open to all personnel, including the Officer Corps and support staff. This includes a number of highly acclaimed executive development programs, as well as a variety of graduate school and agency-sponsored leadership development programs. USCIS has also acquired an increase in allocations at the Federal Executive Institute (FEI) to prepare high performing individuals to take on leadership positions in the future. As part of the FEI experience, participants are required to participate in a rotational assignment that, upon completion, qualifies as a managerial rotational program in association with the requirements set forth in the Homeland Security Act of 2002.

CISO Recommendation AR 2007 – 18

<p>The Ombudsman recommends that USCIS' blended approach to training continue and expand. USCIS should establish, regulate, and evaluate core training needs throughout its operations in the same manner for its review of the Basic Officer Training Course for adjudicators.</p>
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<p>Moreover, the quality of the curriculum, teaching methodology, and instructors needs to be assured. USCIS should establish a certification process for both federal and contracted instructors.</p>

USCIS Response

<p>USCIS believes that training should involve a variety of approaches and methods. The newly revised officer training program, BASIC (which was implemented in September 2007), blends many different learning techniques in a variety of settings, including formal classroom lectures, interactive discussions and exercises, and hands-on practical training.</p>

<p>USCIS is committed to developing and maintaining a consistent and high-quality training program. The Federal Law Enforcement Training Center (FLETC), where USCIS officers currently are trained, has an instructor certification program, and the agency is looking into its quality and efficiency for wider use among the regular and adjunct instructors.</p>
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CISO Recommendation AR 2007 – 19

<p>To reduce USCIS's dependency on temporary employees and assignments, the agency should establish a table of standard staffing levels and office organization to provide the requisite staff at any particular office.</p>

USCIS Response

<p>USCIS established full-time permanent (FTP) staffing levels for every USCIS HQ and Field Office at the beginning of FY2006. This officially established an approved table of organization staffing profiles for every office, which helped ensure that appropriate internal controls were in place to prevent individual offices from hiring more employees than the budget could support. In addition, USCIS accounts for and controls its authorized positions, both permanent and temporary, through the Table of Organization Position System (TOPS) that is owned and maintained by Immigration and Customs Enforcement (ICE). USCIS accesses this system and provides financial resources to support its use through a service-level agreement (SLA) with ICE.</p>

<p>In addition to establishing a formal table of organization and managing all positions through the TOPS system, the Operations Planning Division within the Domestic Operations Directorate has developed a staffing allocation model (SAM) to identify the required number of permanent and temporary positions that are needed to timely and accurately process pending and incoming workload within the published processing time standards.</p>

CISO Recommendation AR 2007 – 20

The Ombudsman recommends that USCIS expand the opportunities for vertical and horizontal communication among offices by supporting conferences focused on specific work issues and providing funds for travel of working level staff to share best practices.
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USCIS Response

USCIS is committed to sharing best practices among various offices through the use of live conferences and promoting fiscal responsibility through greater use of web-based video conferencing.

USCIS recently hosted in-person conferences and meetings of subject-matter experts to share ideas and best practices to create training modules for the newly revised basic officer training program. This has provided an excellent opportunity for USCIS employees at the working level to take part in creating a shared vision that will be used to train and develop our newest officers throughout the agency.
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CISO Recommendation AR 2007 – 21

The Human Capital and Training Office in collaboration with field offices and service centers, should determine the skills and knowledge sets required for supervisors to be effective in their daily managing of people and resources. Specific resources or training programs should be identified on diversity requirements, discipline issues, handling problem employees, evaluating workflows, and budget management. Headquarters funds should be provided to field offices for employees to attend these sessions.

USCIS Response

The new fee rule funding will provide enhanced resources for USCIS training. The new training budget includes funding for these types of supervisory training and development programs that equip USCIS supervisors to be more effective managers. The training program is also working to improve the curriculum for the supervisory training courses.

CISO Recommendation AR 2007 – 22

The agency should establish actionable multi-year milestones that lead to fulfilling the objectives of the Strategic Workforce Plan and ensure a systemic and sustained effort to recruit and develop its personnel. Responsibility to implement the plan should be included as a specific job requirement for the Chief Human Capital Officer and in the job requirements statements of the senior officers in the Office of Human Capital and Training.
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USCIS Response

Following a contracted study of the current status and future requirements of the USCIS workforce and training programs, the Office of Human Capital, Training and Career Development recently received a report outlining a potential strategic framework for multiple human capital initiatives. USCIS is currently examining the research and findings of the report in more detail. It will give careful thought to the ideas presented and strategically implement selected recommendations in coordination with operational needs.

CISO Recommendation AR 2007 – 23

The Ombudsman recommends that USCIS:

- (1) Consider amending job requirements to include basic knowledge of certain commercially available computer programs used in the offices; and**
- (2) Provide all interviewing officers with Interviewing Techniques Training. Adjudicators who received this training indicated it helped them conduct better interviews.**

USCIS Response

USCIS has found that most employees come to their respective positions with a basic working knowledge of relevant commercially available computer programs. However, local training is also offered as needed on those commercially available programs that pertain to each employee’s specific job duties, particularly to those who require a more advanced level of program knowledge.

Instruction on interviewing methods and techniques has always been an integral part of basic officer training, but this topic now receives significantly more emphasis and attention in the recently implemented BASIC training program, which began in September 2007. BASIC training includes an additional practical training section, which provides all student officers with an opportunity to conduct live interviews under the guidance and supervision of an experienced officer.

CISO Recommendation AR 2007 – 24

The Ombudsman recommends that USCIS end the now three-year old DORA pilot. USCIS should evaluate the different up-front processing programs to determine the comparative value of each program and whether they should be expanded. The USCIS findings and empirical data should be made available to the public. The agency should either implement a version of DORA nationwide or another program which will achieve the same objectives with equal or better results.

USCIS Response

The District Office Rapid Adjudication (DORA) pilot program initiative was instituted on the recommendation of the USCIS Ombudsman. The initiative was designed to increase USCIS customer service, processing efficiency, and national security. USCIS reviewed the pilot program. Based on this analysis, USCIS decided to allow the DORA pilot to end on the previously announced pilot cessation date of September 21, 2007. USCIS did incorporate some of the efficiencies noted during the DORA pilot into the intake procedures at the National Benefit Center such as, the prescreening of applications and initiating biometrics checks before scheduling interviews.

CISO Recommendation AR 2007 – 25

<p>The Ombudsman recommends that USCIS redraft Form I-589, the asylum application, so that it is less complicated and more understandable by the intended audience – persons who have been persecuted based on race, religion, nationality, membership in a particular social group, or political opinion.</p>

USCIS Response

<p>On June 29, 2007, USCIS published a notice in the Federal Register requesting input from the public on making the Application for Asylum and for Withholding of Removal (Form I-589) and its instructions more user-friendly. USCIS did not receive any comments during this 60-day period.</p>
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<p>To enhance comprehension and better assist applicants with completion of the form, however, the USCIS Asylum Division has been working to translate Form I-589 and its instructions into many of the most common languages used by asylum applicants including Spanish, Creole, Chinese, Russian, Indonesian, Arabic, Amharic, French, Armenian, Nepalese, and Albanian. These translated documents are scheduled for publication before the end of calendar year 2007.</p>
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<p>In addition, USCIS and the Department of Justice Executive Office for Immigration Review (EOIR) are currently finalizing new guidelines regarding filing locations for inclusion in the form instructions, an addition made necessary due to the removal of such guidelines previously outlined in USCIS regulations. USCIS will publish this modification and the I-589 renewal in a 30-day Federal Register notice prior to the expiration of the I-589 at the end of December 2007.</p>

<p>Finally, USCIS and EOIR will continue to coordinate and discuss possible changes to simplify the I-589 application and instructions during the annual revision process.</p>
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