



Office of Inspector General  
United States Department of State

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Office of Audits

June 2020

# **Management Assistance Report: Quarterly Reporting on Afghan Special Immigrant Visa Program Needs Improvement**

MANAGEMENT ASSISTANCE REPORT

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## Summary of Review

In 2009, Congress established a special immigrant visa (SIV) program to resettle Afghans who worked on behalf of the United States and experienced an ongoing and serious threat as a result of their employment with the U.S. Government. The Afghan Allies Protection Act of 2009 establishes a program to provide SIVs to Afghan nationals who were or are employed by, or on behalf of, the U.S. Government in Afghanistan.<sup>1</sup> The FY 2020 National Defense Authorization Act (NDAA) directed the Department of State (Department), Office of Inspector General (OIG), to review and issue a report that evaluates obstacles to effective protection of Afghan allies.<sup>2</sup>

During the course of this mandated review of the Afghan SIV Program, which is currently underway, OIG found that the method for collecting, verifying, and reporting on applicant “wait times” is inconsistent and potentially flawed. The FY 2014 NDAA requires the Secretaries of Homeland Security and State to publish quarterly reports that describe the average wait times for an applicant for four stages: 1) receiving approval from the Chief of Mission, 2) completing the adjudication of Form I-360, 3) conducting a visa interview, and 4) issuing the visa to an eligible applicant.<sup>3</sup> The FY 2014 NDAA also states that these quarterly reports should describe efficiency improvements and provide the reasons for the failure to process any applications that have been pending for more than 9 months.

OIG found that the entities responsible for reporting applicant wait times at each of the four stages of the Afghan SIV process are using differing methodologies to perform their calculations. For example, the Department’s National Visa Center and the Afghan Special Immigrant Visa Unit (ASIV Unit) use the total number of applicant packages processed as the basis of calculations but the Department of Homeland Security’s U.S. Citizenship and Immigration Services uses the total number of applicant packages it received as the basis of its calculations. In addition, some entities do not capture all applicant wait times. OIG also found that none of the 23 quarterly reports published by the Department between April 2014 and October 2019 included descriptions of the efficiency improvements, as required by Congress.

The differing methodologies used and the incomplete quarterly reports occurred because the Department, having assumed the lead role in preparing and publishing the quarterly reports regarding the Afghan SIV program, has not developed guidance that ensures that each entity involved with the Afghan SIV process is using a uniform and consistent method to calculate and report the average wait times. Similarly, the Department has not put in place internal controls that ensure that information in the quarterly reports is complete and fulfills the

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<sup>1</sup> Afghan Allies Protection Act of 2009, Pub. L. 111 8, March 11, 2009, § 602(b).

<sup>2</sup> FY 2020 National Defense Authorization Act, Section 1215, “Special Immigrant Visa Program Reporting Requirement,” 435.

<sup>3</sup> FY 2014 NDAA, Section 1219, Improvement of the Afghan Special Immigrant Visa Program, (12) Report on Improvements, (B) Contents, (13) Public Quarterly Reports, 245.

requirements set forth by Congress. Until these deficiencies are corrected, the quarterly reports may not be providing information responsive to Congress's requirements.

OIG made three recommendations to the Assistant Secretary for Consular Affairs to prompt actions to address the identified deficiencies. The Assistant Secretary for Consular Affairs agreed with all three recommendations. On the basis of his response to a draft of this report, OIG considers all three recommendations resolved, pending further action. A synopsis of the comments regarding the recommendations offered and OIG's reply follow each recommendation in the Results section of this report. The Assistant Secretary's response to a draft of this report is reprinted in its entirety in Appendix A. In addition, U.S. Embassy Kabul, Afghanistan, agreed with the recommendations offered and provided written comments. Those comments are reprinted in Appendix B.

## BACKGROUND

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The Afghan Allies Protection Act of 2009 authorized visas, also known as SIVs, to Afghans who were or are "employed by or on behalf of, the [U.S.] Government in Afghanistan . . . ; provided faithful and valuable service to [the U.S.] Government . . . ; and has experienced or is experiencing an ongoing serious threat as a consequence of [their] employment by the [U.S.] Government."<sup>4</sup> In 2013, Congress amended this act so that the Secretaries of State and Homeland Security shall "improve the efficiency by which applications for special immigrant visas . . . are processed . . . ." The FY 2014 NDAA reiterates the requirements in the Afghan Allies Protection Act of 2009 and prescribes guidance for the U.S. Government to improve the efficiency of the application process. In particular, the FY 2014 NDAA identifies four stages of the application process in which the U.S. Government could implement such improvements. Those stages are: 1) receiving approval from the Chief of Mission, 2) completing the adjudication of form I-360, 3) conducting a visa interview, and 4) issuing the visa to an eligible applicant.<sup>5</sup> As of September 30, 2019, the Department reported 8,664 pending applicants at any of the 4 stages in the Afghan SIV process.<sup>6</sup>

Several entities play significant roles in the four stages of the SIV application process. The Department's National Visa Center<sup>7</sup> reviews the applicant's package for completeness and

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<sup>4</sup> Afghan Allies Protection Act of 2009, Pub. L. 111 8, March 11, 2009, § 602(b). This program is distinct from another program authorizing SIVs for certain Iraqi and Afghan translators and interpreters who worked directly with the United States Armed Forces or under Chief of Mission authority, although some translators and interpreters may qualify under both programs. For information on that program, see [Special Immigrant Visas for Iraqi and Afghan Translators/Interpreters](#).

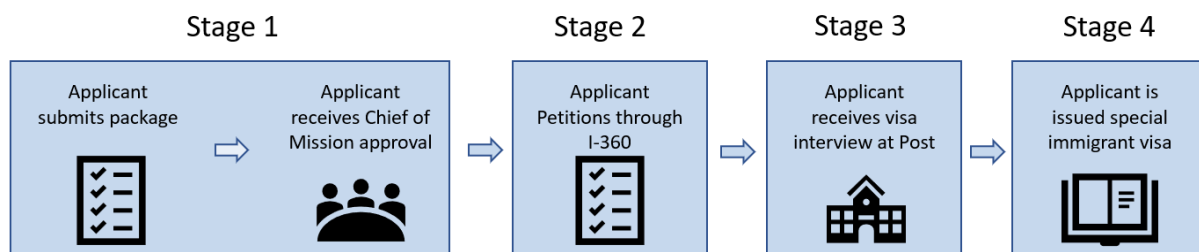
<sup>5</sup> FY 2014 NDAA, Section 1219, Improvement of the Afghan Special Immigrant Visa Program, (12) Report on Improvements, (B) Contents, (13) Public Quarterly Reports, 245.

<sup>6</sup> FY 2019 Quarter Four Report, Joint Department of State/Department of Homeland Security Report: Status of the Afghan Special Immigrant Visa Program, "Applications Pending at Each Stage of the SIV Application Process," <https://travel.state.gov/content/dam/visas/SIVs/Q4-Afghan-SIV-Report-October-2019.pdf>, 4.

<sup>7</sup> The National Visa Center, located in Portsmouth, NH, is within the Bureau of Consular Affairs, Visa Office, Domestic Operations.

submits the package to the ASIV Unit.<sup>8</sup> The ASIV Unit verifies the applicant's eligibility and makes a recommendation for approval or denial to the Chief of Mission Committee.<sup>9</sup> If approved, the ASIV Unit notifies the National Visa Center. The National Visa Center then notifies the applicant that he or she should complete form I-360<sup>10</sup> petitioning to the Department of Homeland Security's U.S. Citizenship and Immigration Services for a visa. U.S. Citizenship and Immigration Services then adjudicates the SIV applicant's petition for SIV eligibility. If the petition is approved, the National Visa Center notifies the applicant of eligibility and schedules an immigrant visa interview. A Consular Officer at Embassy Kabul, Afghanistan, conducts the interview and ultimately determines whether the applicant receives a visa through the Afghan SIV program. Figure 1 depicts the four stages of the Afghan SIV approval process.

**Figure 1: The Four Stages of the Afghan SIV Approval Process**



**Source:** OIG generated from information obtained from the FY 2014 NDAA and the Department.

## Reporting Requirements to Congress

The FY 2014 NDAA requires the Secretaries of Homeland Security and State to publish quarterly reports on the Department's website, which describes "the average wait times for an applicant" for four stages: 1) receiving approval from the Chief of Mission, 2) completing the adjudication of form I-360, 3) conducting a visa interview, and 4) issuing the visa to an eligible applicant.<sup>11</sup> The FY 2014 NDAA also states that these quarterly reports should describe "the efficiency improvements made in the process by which applications for [SIVs] . . . are processed . . ." and include information related to "the reasons for the failure to process any applications that have been pending for more than 9 months." Although the Secretary of State and the Secretary of Homeland Security are required to publish joint quarterly reports, the Department's Immigration and Employment Division leads the effort in collecting the data and preparing the

<sup>8</sup> The Afghan Special Immigrant Visa Unit is an office within the Executive Office of the Bureau of Near Eastern Affairs and South and Central Asian Affairs.

<sup>9</sup> The Chief of Mission Committee makes a recommendation to approve or deny the applicant. Once a recommendation is made, the Assistant Chief of Mission, delegated by the Chief of Mission, makes the final decision.

<sup>10</sup> I-360, Petition for Amerasian, Widow(er), or Special Immigrant.

<sup>11</sup> FY 2014 NDAA, Section 1219, Improvement of the Afghan Special Immigrant Visa Program, (12) Report on Improvements, (B) Contents, (13) Public Quarterly Reports, 245.

reports to meet statutory requirements.<sup>12</sup> Once a quarterly report is prepared, the Immigration and Employment Division shares it with the Department of Homeland Security and the Department of Defense. Once these agencies review and approve the report, the Department posts the report on its public website in accordance with the FY 2014 NDAA.<sup>13</sup>

## **Purpose of the Ongoing Review and This Management Assistance Report**

This Management Assistance Report is intended to provide early communication of deficiencies OIG identified during its ongoing review to evaluate the obstacles to effective protection of Afghan allies through the special immigrant visa program and provide suggestions for improvements in future programs. The FY 2020 NDAA required OIG to evaluate and offer improvements to eight identified obstacles to effective protection of Afghan and Iraqi allies through the special immigrant visa program.<sup>14</sup> Congress requested that the report address the following areas:

- The hiring of locally employed staff and contractors.
- Documenting the identity and employment of locally employed staff and contractors, including the possibility of establishing a central database of employees and contractors.
- The protection and safety of locally employed staff and contractors.
- The means of expediting all stages of the process for applicants, including consideration of reducing required forms.
- Appropriate staffing levels for expedited processing domestically and abroad.
- The effect of uncertainty of visa availability on visa processing.
- The cost and availability of medical examinations.
- The means to reduce delays in interagency processing and security checks.

OIG is reporting the deficiencies identified in this report in accordance with the Quality Standards for Inspection and Evaluation, issued by the Council of the Inspectors General on Integrity and Efficiency in 2012. This report relates to the overseas contingency operation Operation Freedom's Sentinel and was completed in accordance with OIG's oversight responsibilities as described in Section 8L of the Inspector General Act of 1978, as amended.

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<sup>12</sup> The Immigration and Employment Division is an office within the Bureau of Consular Affairs, Visa Office, Field Operations.

<sup>13</sup> Specifically, the quarterly reports are posted online by the Outreach and Inquiries Division, which is a different office within the Bureau of Consular Affairs, Visa Office, Field Operations.

<sup>14</sup> FY 2020 NDAA, Section 1215, "Special Immigrant Visa Program Reporting Requirement," 435.

## RESULTS

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OIG found that the entities responsible for reporting applicant wait times at each of the four stages of the Afghan SIV process are using differing methodologies to perform their calculations. OIG also found that none of the 23 quarterly reports published by the Department between April 2014 and October 2019 included descriptions of the efficiency improvements required by Congress. Differing methodologies were used and incomplete quarterly reports were issued because the Department has not developed guidance that ensures that each entity is using a uniform and consistent method to calculate and report the average wait times. The Department has not implemented internal controls that ensure that information in the quarterly reports is complete and fulfills the requirements set forth by Congress. Until these deficiencies are corrected, the quarterly reports may not provide information responsive to Congress's requirements.

### **Department's Method for Collecting, Verifying, and Reporting on Applicant Wait Times Is Inconsistent and Potentially Flawed**

The Department's Immigration and Employment Division is responsible for collecting and reporting the overall wait times for an Afghan SIV applicant to receive a visa. According to the FY 2014 NDAA, the overall wait time is the time between the date on which the applicant submits all required materials to the date the visa is received.

As previously described, the visa issuance process is divided into four stages. Those stages are further divided into 14 steps. The Immigration and Employment Division obtains the average wait times for each of those steps from the responsible entity. It then adds the numbers together to determine an applicant's overall average wait time in the Afghan SIV process. Table 1 provides details about the stages and steps of the Afghan SIV application process, along with the responsible entity involved.

**Table 1: Stages and Steps of the Afghan Special Immigrant Visa Process**

Stage	Step	Description	Responsible Entity
<b>Chief of Mission Application</b>	1	Applicant submits Chief of Mission application package to the National Visa Center.	Applicant
	2	National Visa Center reviews documents for completeness.	National Visa Center
	3	National Visa Center sends completed package to the ASIV Unit for Chief of Mission decision.	National Visa Center
	4	ASIV Unit reviews applicant packages and sends to Chief of Mission for approval or denial.	ASIV Unit
	5	National Visa Center receives the applicant's Chief of Mission decision. If approved, the National Visa Center sends an approval letter to the applicant. If denied, the applicant can appeal the decision or reapply as a new applicant.	National Visa Center
<b>Form I-360 Adjudication</b>	6	Applicant petitions U.S. Citizenship and Immigration Services using form I-360.	Applicant
	7	U.S. Citizenship and Immigration Services adjudicates the petition and sends the completed applicant package to National Visa Center, if approved.	U.S. Citizenship and Immigration Services
<b>Visa Interview, Including Pre- and Post-Interview</b>	8	National Visa Center instructs the applicant to provide documentation for an immigrant visa.	National Visa Center
	9	Applicant submits requested documentation to the National Visa Center.	Applicant
	10	National Visa Center reviews documents for completeness.	National Visa Center
	11	National Visa Center schedules an interview with the applicant to take place at the embassy.	National Visa Center
	12	A Consular Officer interviews the applicant; administrative processing is initiated following the interview.	Embassy Kabul
	13	The applicant's case undergoes administrative processing.	Interagency partners <sup>a</sup>
<b>Visa Issuance</b>	14	When administrative processing is complete, the applicant is instructed to obtain a medical examination. The visa is issued if the applicant is eligible.	Applicant

<sup>a</sup> The Bureau of Consular Affairs, Office of Screening, Analysis, and Coordination, coordinates with interagency partners and provides weekly statistics for the Immigration and Employment Division to compile.

**Source:** OIG generated from information obtained from the Department's quarterly reports and interviews with U.S. Government officials.

### ***Average Wait Times Calculated Differently Among the Entities***

The National Visa Center, the ASIV Unit, Embassy Kabul, and U.S. Citizenship and Immigration Services are using differing methodologies when calculating average wait times. For example, the National Visa Center and the ASIV Unit (responsible for step 4) calculate average wait times

by using the total number of applicant packages *processed* as the basis of their calculations.<sup>15</sup> In contrast, U.S. Citizenship and Immigration Services (responsible for step 7) told OIG that it calculates the average wait time by using the total number of applicant packages it *received* in conjunction with the total number of applicant packages it *processed*.

Separately, OIG also found that the ASIV Unit uses a sampling methodology to determine the average wait times for its processing of the SIV applicant package. Specifically, it performs its calculations by selecting a random sample of 100 applicant packages out of the total number of applicant packages that it processed and sent to Embassy Kabul for a Chief of Mission decision. In contrast, the National Visa Center calculated the average wait times considering *all* (or 100 percent) the applicant packages it processed. In another example, the U.S. Citizenship and Immigration Services excluded certain application packages from its population when calculating average wait times.<sup>16</sup>

In addition to the inconsistent methods used to calculate the average wait times, some entities do not capture all applicant wait times. In one example, the ASIV Unit excludes from its total wait time what it called “pauses” during the process. Specifically, when the ASIV Unit verifies the applicant’s former employment (part of step 4), it does not include the time it waits to receive a confirmation from the applicant’s employer. ASIV Unit officials told OIG that they do not have control over the time it takes for the employer to respond and therefore inserts a “pause” on the clock.

OIG notes that the different approaches to calculating wait times do, in fact, make a difference in the reported outcomes. For example, in the FY 2019 Third Quarter report, the report stated that the average wait time for applicants who received a Chief of Mission decision (step 4) was 415 days. However, OIG analyzed the same data without including “pauses” and determined that the average wait times between the ASIV Unit submitting the application package to receiving a Chief of Mission decision was 480 days.<sup>17</sup> In this instance, the ASIV Unit arguably understated the average wait times for step 4 by 65 days because of the “pauses” it inserted.

In another example, when the National Visa Center schedules an interview with the applicant (part of step 11), neither it nor Embassy Kabul accounted for the time between the scheduling of an interview and when the interview took place (step 12). Specifically, the National Visa Center told OIG that it schedules applicant interviews at least 30 days in advance, but it does

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<sup>15</sup> The National Visa Center considers the SIV application “processed” at the point when all applicant supporting documentation has been reviewed and determined to be complete. In contrast, the ASIV Unit considers the SIV application “processed” at the point when all applicant supporting documentation received from the National Visa Center (step 3) has been verified and application has been sent to the Chief of Mission for approval or denial.

<sup>16</sup> U.S. Citizenship and Immigration Services officials told OIG that, when they require additional documentation from the applicant, they remove those applications from the total population when calculating average wait times because they consider the time elapsed while awaiting a response from the applicant to be outside of their control.

<sup>17</sup> OIG analyzed the data on the basis of the same 100 randomly selected cases that the ASIV Unit used in its original reporting. The actual average wait time calculation would likely be different if the ASIV Unit included all the applicant packages it processed rather than a random sample.

not count the 30 days as part of the wait time in the Afghan SIV process. In addition, OIG found that Embassy Kabul reported its average wait time in business days rather than in calendar days. The quarterly reports themselves, though, state that wait times are calculated by calendar days.<sup>18</sup>

***Quarterly Reports Do Not Include Description of Process Improvements or Explanations for Extended Wait Times***

OIG reviewed the 23 reports published by the Immigration and Employment Division between April 2014 and October 2019 and found that none of them included required descriptions of efficiency improvements, although this information is mandated by the FY 2014 NDAA. In these reports, the only mention of efficiency improvements was a sentence that states to some extent that “process improvements have resulted in improved efficiencies.” There was no further elaboration regarding the nature of these efficiencies.

OIG also found that five of the reports did not sufficiently describe the “reasons for failure to process any applications that have been pending for longer than 9 months” also required by the FY 2014 NDAA. For example, under the section titled “Applications Pending Longer than Nine Months,” these reports state to some extent that “applications may be pending longer than 9 months for completion of administrative processing (step 13).”<sup>19</sup> However, OIG found that some preceding steps also had average wait times that exceeded the 9-month metric.<sup>20</sup> In other words, identifying step 13 as the single cause for delays does not fully explain the reasons why the visas were not issued within 9 months.

***The Department Has Not Developed Guidance for Calculating Wait Times or Established Internal Controls To Validate and Verify Completeness of Reports***

The various entities relied on differing methodologies because the Immigration and Employment Division has not developed guidance that ensures that each entity involved in the Afghan SIV process is using a uniform and consistent method to calculate and report the average wait times. Officials from the National Visa Center, the ASIV Unit, Embassy Kabul, and U.S. Citizenship and Immigration Services all told OIG that they have not received guidance from the Immigration and Employment Division on how to calculate applicant wait times and therefore developed their own methodologies for the calculation. Immigration and Employment Division officials, however, told OIG that they do not have the authority to provide

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<sup>18</sup> See FY 2019 Fourth Quarter Report, “Joint Department of State/Department of Homeland Security Report: Status of the Afghan Special Immigrant Visa Program,” <https://travel.state.gov/content/dam/visas/SIVs/Q4-Afghan-SIV-Report-October-2019.pdf>. Reports issued prior to FY 2016 Third Quarter Reports are reported in business days.

<sup>19</sup> Specific to the quarterly reports, administrative processing (required as part of step 13) is primarily the period when the applicant receives additional security vetting through interagency partners. That vetting is coordinated through the Bureau of Consular Affairs, Office of Screening, Analysis, and Coordination.

<sup>20</sup> For example, the FY 2019 Third Quarter Report states that step 4 took an average of 415 days (or nearly 14 months). See <https://travel.state.gov/content/dam/visas/SIVs/Q3-Afghan-SIV-Report-July-2019.pdf>. This information was not discussed as a reason for delays beyond the 9-month metric.

overarching direction to offices that are in different Department bureaus or in a different Federal agency and that their authority extends only to collecting information and publishing the quarterly reports.

The Immigration and Employment Division also has not implemented internal management controls to verify and validate that the information it collects to include in the quarterly reports is complete. To collect other information to include in the quarterly reports, it either provides the previous quarterly report template or sends an email request for data to the National Visa Center, the ASIV Unit, Embassy Kabul, and U.S. Citizenship and Immigration Services and requests that each entity provide its own information. Once received, the Immigration and Employment Division accepts those submissions without verifying for accuracy or completeness. Immigration and Employment Division officials told OIG that when the report is reviewed by senior leaders at the Department, the Department of Homeland Security, and the Department of Defense, no concerns about data accuracy or completeness have been raised.

The differing methods used among the entities involved with the Afghan SIV program to calculate wait times and lack of internal controls to ensure that the quarterly reports are complete result in submission of information that does not clearly reflect the state of the Afghan SIV program and the time it takes to process visas. Until these deficiencies are corrected, the quarterly reports may not provide information responsive to Congress's requirements. Correcting the deficiencies OIG identified would allow the quarterly reports to be more transparent and provides Congress with the information it needs for decision making.

**Recommendation 1:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement guidance for the entities involved with the processing of Afghan special immigrant visas that establishes a uniform method to be used for calculating and reporting average wait times.

**Management Response:** The Assistant Secretary for Consular Affairs agreed with the recommendation, stating that the Immigration and Employment Division, the National Visa Center, the Afghan Special Immigrant Visa Unit, and Embassy Kabul will "meet to discuss coordinating the method of averaging processing times for the quarterly reports." He stated, "Once a method of averaging is agreed upon, all Department of State . . . partners will implement the chosen method in future quarterly reports. The target date for implementation is the 4th Quarterly Report for FY 2020, which will include a statement explaining the change in methodology." Lastly, he stated that the Immigration and Employment Division will inform U.S. Citizenship and Immigration Services of the change to Department calculations when requesting data.

**OIG Reply:** On the basis of the Assistant Secretary for Consular Affairs' concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that the Bureau of Consular Affairs has implemented guidance for the entities involved with the processing of Afghan special immigrant visas and has established a uniform method for calculating and reporting average wait times.

**Recommendation 2:** OIG recommends that the Assistant Secretary for Consular Affairs direct the Immigration and Employment Division to comply with the reporting requirements outlined in the Afghan Allies Protection Act of 2009, as amended, including providing detailed explanations for the failure to process any applications that have been pending for longer than 9 months, consistent with the requirements established in the FY 2014 National Defense Authorization Act, Section 1219, Paragraph 12, Reports on Improvements.

**Management Response:** The Assistant Secretary for Consular Affairs agreed with the recommendation, stating that, “The Department [of State] will provide reports consistent with the requirements in Section 1219, Paragraph 13, of the FY 2014 National Defense Authorization [Act].”

**OIG Reply:** On the basis of the Assistant Secretary for Consular Affairs’ concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. Section 1219, Paragraph 13, Public Quarterly Reports in the FY 2014 National Defense Authorization Act requires reporting information outlined in Section 1219, Paragraph 12, Reports on Improvements. This recommendation will be closed when OIG receives and accepts documentation demonstrating that the Bureau of Consular Affairs has complied with the reporting requirements outlined in the Afghan Allies Protection Act of 2009, as amended, including providing detailed explanations for the failure to process any applications that have been pending for more than 9 months.

**Recommendation 3:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement internal management controls to verify and validate the accuracy and completeness of the information obtained from the entities involved with the processing of Afghan special immigrant visas, and require that identified efficiency improvements are reported quarterly, in accordance with the Afghan Allies Protection Act of 2009, as amended.

**Management Response:** The Assistant Secretary for Consular Affairs agreed with the recommendation, stating initially that “[t]he Under Secretary for Management (currently Brian Bulatao) was designated as the Senior Coordinating Official for the Afghan and Iraqi [Special Immigrant Visa] programs by Secretary Pompeo on March 15, 2020, and these managerial responsibilities, which involve bureaus beyond [the Bureau of Consular Affairs] fall under the purview of the [Department of State’s] Senior Coordinating Official rather than the Assistant Secretary for Consular Affairs.” The Assistant Secretary for Consular Affairs further stated that he will “ensure each of the offices within [the Bureau of Consular Affairs] is complying with the data pull standards agreed to from Recommendation 1 and that the information reflected in the report from [the Bureau of Consular Affairs] is cleared by the appropriate offices with direct oversight and access to the raw data to ensure its accuracy.”

**OIG Reply:** On the basis of the Assistant Secretary for Consular Affairs’ concurrence with the recommendation and actions planned as well as the information regarding the designation of the Senior Coordinating Official, OIG considers the recommendation resolved, pending

further action. OIG received the Secretary's designation of the Under Secretary for Management as the Senior Coordinating Official for the Afghan SIV program. Although the Assistant Secretary for Consular Affairs will retain responsibility for implementation of this recommendation, OIG agrees that the Senior Coordinating Official is best positioned to develop and implement internal controls involving bureaus other than the Bureau of Consular Affairs. Accordingly, this recommendation will be closed when OIG receives and accepts documentation demonstrating that the Senior Coordinating Official for the Afghan SIV program and the Bureau of Consular Affairs have implemented internal management controls to verify and validate the accuracy and completeness of the information obtained from the entities involved with the processing of Afghan special immigrant visas as well as require that identified efficiency improvements are reported quarterly, in accordance with the Afghan Allies Protection Act of 2009, as amended.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement guidance for the entities involved with the processing of Afghan special immigrant visas that establishes a uniform method to be used for calculating and reporting average wait times.

**Recommendation 2:** OIG recommends that the Assistant Secretary for Consular Affairs direct the Immigration and Employment Division to comply with the reporting requirements outlined in the Afghan Allies Protection Act of 2009, as amended, including providing detailed explanations for the failure to process any applications that have been pending for longer than 9 months, consistent with the requirements established in the FY 2014 National Defense Authorization Act, Section 1219, Paragraph 12, Reports on Improvements.

**Recommendation 3:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement internal management controls to verify and validate the accuracy and completeness of the information obtained from the entities involved with the processing of Afghan special immigrant visas, and require that identified efficiency improvements are reported quarterly, in accordance with the Afghan Allies Protection Act of 2009, as amended.

## APPENDIX A: BUREAU OF CONSULAR AFFAIRS RESPONSE

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United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

May 28, 2020

### MEMORANDUM

TO: OIG/AUD – Norman P. Brown

FROM: CA – Carl C. Risch *CCR*

SUBJECT: CA Response to Draft Report – *Management Assistance Report: Quarterly Reporting on the Afghan Special Immigrant Visa Program Needs Improvement*

The Bureau of Consular Affairs (“CA”) appreciates the OIG Audit team’s review of the Quarterly Reporting on the Afghan Special Immigrant Visa (SIV) program. The review provides actionable insights into the program and CA welcomes the opportunity to comment on the draft report.

**OIG Recommendation 1:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement guidance for the entities involved with the processing of Afghan Special Immigrant Visas that establishes a uniform method to be used for calculating and reporting average wait times.

**CA Response:** Agree

The Immigration and Employment Division, the National Visa Center (“NVC”), Afghan Special Immigrant Visa Unit (“ASIV”), and Embassy Kabul will meet to discuss coordinating the method of averaging processing times for the quarterly reports. Once a method of averaging is agreed upon, all Department of State (“Department”) partners will implement the chosen method in future quarterly reports. The target date for implementation is the 4th Quarterly Report for FY 2020, which will include a statement explaining the change in methodology. The Immigration and Employment Division will inform USCIS of this change to Department calculations when requesting data for the 4th Quarterly Report for FY 2020.

**OIG Recommendation 2:** OIG recommends that the Assistant Secretary for Consular Affairs direct the Immigration and Employment Division to comply with the reporting requirements outlined in the Afghan Allies Protection Act of 2009, as amended, including providing detailed explanations for the failure to process any applications that have been pending for longer than 9 months, consistent with the requirements established in the FY 2014 National Defense Authorization Act, Section 1219, Paragraph 12, Reports on Improvements.

**CA Response:** Agree

The Department will provide reports consistent with the requirements in Section 1219, Paragraph 13, of the FY2014 National Defense Authorization.

**OIG Recommendation 3:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement internal management controls to verify and validate the accuracy and completeness of the information obtained from the entities involved with the processing of Afghan special immigrant visas, and require that identified efficiency improvements are reported quarterly, in accordance with the Afghan Allies Protection Act of 2009, as amended.

**CA Response:** Agree

The Under Secretary for Management (currently Brian Bulatao) was designated as the Senior Coordinating Official for the Afghan and Iraqi SIV programs by Secretary Pompeo on March 15, 2020, and these managerial responsibilities, which involve bureaus beyond CA, fall under the purview of the Department's Senior Coordinating Official rather than the Assistant Secretary for Consular Affairs. Please find the signed designation attached.

The quarterly reports currently undergo a thorough clearance process where the information and data are compiled and reviewed by each of the clearing partner offices, including interagency partners. As the Assistant Secretary for Consular Affairs, I will ensure each of the offices within CA is complying with the data pull standards agreed to from Recommendation 1 and that the information reflected in the report from CA is cleared by the appropriate offices with direct oversight and access to the raw data to ensure its accuracy.

Approved:	CA: Carl C. Risch	()
Drafted:	CA/VO/F/IE – Elizabeth Evashwick	
Cleared:	CA: IGBrownlee	(OK)
	CA: KStoddard	(OK)
	CA/VO: ERamotowski	(OK)
	CA/VO: MMesquita	(OK)
	CA/VO/F: SCraig	(OK)
	CA/VO/F: BMarwaha	(OK)
	CA/VO/SAC/S: KMay	(OK)
	CA/VO/L/R: AAttar	(OK)
	CA/VO/DO: LStein	(OK)
	CA/VO/DO/NVC: JSheeley	(OK)
	Embassy Kabul: MKatula	(OK)
	NEA-SCA/EX/ASIV: GGenuino	(OK)
	NEA-SCA/EX: JKorach	(OK)
	L/CA: LBellshaw	(OK)
	L/CA: MMadad	(OK)

## APPENDIX B: U.S. EMBASSY KABUL, AFGHANISTAN, RESPONSE

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*Embassy of the United States of America*

***Kabul, Afghanistan***

May 25, 2020

Norman P. Brown  
Assistant Inspector General for Audits  
1700 N. Moore St., Suite 700  
Rosslyn, VA 22209

Dear Mr. Brown:

U.S. Embassy Kabul is grateful for the OIG Audit team's review of the Quarterly Reporting on the Afghan Special Immigrant Visa (SIV) program and agrees with the below recommendations.

**OIG Recommendation 1:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement guidance for the entities involved with the processing of Afghan Special Immigrant Visas that establishes a uniform method to be used for calculating and reporting average wait times.

**OIG Recommendation 2:** OIG recommends that the Assistant Secretary for Consular Affairs direct the Immigration and Employment Division to comply with the reporting requirements outlined in the Afghan Allies Protection Act of 2009, as amended, including providing detailed explanations for the failure to process any applications that have been pending for longer than 9 months, consistent with the requirements established in the FY 2014 National Defense Authorization Act, Section 1219, Paragraph 12, Reports on Improvements.

**OIG Recommendation 3:** OIG recommends that the Assistant Secretary for Consular Affairs develop and implement internal management controls to verify and validate the accuracy and completeness of the information obtained from the entities involved with the processing of Afghan special immigrant visas, and require that identified efficiency improvements are reported quarterly, in accordance with the Afghan Allies Protection Act of 2009, as amended.

It is our understanding that the Bureau of Consular Affairs (CA) will also agree to the recommendations. U.S. Embassy Kabul will adhere to CA's guidance on the timing and implementation of any corrective actions regarding the Quarterly Reporting on the Afghan SIV program.

Sincerely,

A handwritten signature in dark ink, appearing to be "RW", written over a faint horizontal line.

Ross Wilson  
Chargé d'Affaires



## ABBREVIATIONS

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ASIV Unit	Afghan Special Immigrant Visa Unit
Department	Department of State
NDAA	National Defense Authorization Act
OIG	Office of Inspector General
SIV	special immigrant visa

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