

**Continued Reliance on
Manual Processing Slowed
USCIS' Benefits Delivery
during the COVID-19
Pandemic**





OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

December 28, 2021

MEMORANDUM FOR: The Honorable Ur M. Jaddou
Director
U.S. Citizenship and Immigration Services

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

SUBJECT: *Continued Reliance on Manual Processing Slowed USCIS' Benefits Delivery during the COVID-19 Pandemic*

JOSEPH V
CUFFARI

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JOSEPH V CUFFARI
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Attached for your action is our final report, *Continued Reliance on Manual Processing Slowed USCIS' Benefits Delivery during the COVID-19 Pandemic*. We incorporated the formal comments provided by your office.

The report contains two recommendations aimed at improving USCIS' electronic processing of benefits. Your office concurred with both recommendations. Based on information provided in your response to the draft report, we consider recommendation 1 open and resolved. Once your office has fully implemented the recommendation, please submit a formal closeout letter to us within 30 days so that we may close the recommendation. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Recommendation 2 is resolved and closed. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Bruce Miller, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

Continued Reliance on Manual Processing

Slowed USCIS' Benefits Delivery during the COVID-19 Pandemic

December 28, 2021

Why We Did This Audit

U.S. Citizenship and Immigration Services (USCIS) processes millions of immigration and naturalization benefit requests each year. On March 18, 2020, in response to the COVID-19 pandemic, USCIS temporarily closed its offices and halted in-person services. We conducted this audit to determine the effectiveness of USCIS' technology systems to provide timely and accurate electronic processing of benefits while offices were closed or operating at reduced capacity as a result of the COVID-19 pandemic.

What We Recommend

We made two recommendations to improve the effectiveness of USCIS' electronic processing.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

USCIS' technology systems and infrastructure enabled some electronic processing of benefits to continue from March 2020 through May 2021, despite offices being closed or operating at reduced capacity during the Coronavirus disease 2019 (COVID-19) pandemic. USCIS used its Electronic Immigration System to continue electronically processing 17 of the 102 types of benefits it delivers. USCIS also relied on various operational flexibilities, such as virtual interviews and biometrics reuse, to continue benefits delivery during this time. We attribute these successes to USCIS' recent planning efforts to ensure continuity of operations, as well as its ongoing efforts to transition to an electronic processing environment.

USCIS' primary operational challenge, however, was its continued reliance on paper files to process and deliver benefits. USCIS had limited capability to electronically process more than 80 types of benefits, which still required some manual workflows and paper files to complete cases. Recurring technology performance issues and equipment limitations further constrained USCIS employees' productivity. We attribute these challenges to funding cuts and lost fee revenue that limited spending during this time.

These challenges further increased processing times and resulted in a backlog of 3.8 million cases as of May 2021. Although USCIS digitized key benefits in recent years, it must further eliminate manual workflows and paper file dependency to achieve its 5-year plan to improve benefit processing times.

USCIS Response

USCIS concurred with both of our recommendations.



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Department of Homeland Security

Table of Contents

Background 1

Results of Audit 4

 USCIS Successfully Processed Some Benefits during the COVID-19
 Pandemic..... 4

 USCIS’ Continued Reliance on Manual Processing Impeded Operations
 during the COVID-19 Pandemic..... 8

 Processing Times and Case Backlogs Increased during the COVID-19
 Pandemic..... 15

Recommendations..... 16

Appendixes

Appendix A: Objective, Scope, and Methodology 18

Appendix B: USCIS Comments to the Draft Report 20

Appendix C: USCIS Digitized Forms as of April 2021..... 23

Appendix D: Office of Audits Major Contributors to This Report 24

Appendix E: Report Distribution..... 25

Abbreviations

ASC	Application Support Center
CLAIMS 3	Computer Linked Application Information Management System 3
COVID-19	Coronavirus disease 2019
ELIS	Electronic Immigration System
FOD	Field Operations Directorate
IRIS	Immigration Records and Identity Services Directorate
IT	information technology
NASS	National Appointment Scheduling System
OIT	Office of Information Technology
RAIO	Refugee, Asylum, and International Operations Directorate
SCOPS	Service Center Operations Directorate
USCIS	U.S. Citizenship and Immigration Services
VDI	virtual desktop infrastructure
VPN	virtual private network



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Background

Within the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) processes millions of immigration and naturalization benefit requests each year. During fiscal year 2020, USCIS completed more than 7.6 million applications, petitions, and requests. On an average day, USCIS:

- adjudicates more than 26,000 immigration benefit requests;
- grants asylum to 40 persons already in the United States;
- fingerprints and photographs 10,000 people; and
- welcomes 2,000 new citizens at naturalization ceremonies.

To accomplish its mission, USCIS has approximately 19,000 employees assigned to more than 200 offices around the world. Within USCIS, the Field Operations Directorate (FOD), Service Center Operations Directorate (SCOPS), and the Refugee, Asylum and International Operations Directorate (RAIO) are responsible for timely and accurate processing of immigration and naturalization cases. Also, the Immigration Records and Identity Services Directorate (IRIS) oversees collection of applicant biometrics. Table 1 lists key offices under these directorates and the general services each provides.

Table 1. Key USCIS Offices and the Services Provided

Field Offices	FOD's 88 field offices provide scheduled appointments for interviews, oath ceremonies, and applicant information services.
Asylum Offices	RAIO's 10 asylum offices conduct scheduled interviews for only asylum cases.
Application Support Centers	IRIS manages 131 application support centers that schedule appointments to collect biometrics for applications.
Service Centers	SCOPS' 5 service centers process a large variety of applications and petitions.

Source: DHS Office of Inspector General (OIG)-created using USCIS information

USCIS adjudicates and delivers 102 different types of immigration benefits, including petitions, applications, and requests for citizenship and lawful permanent residence; family-based immigration; immigrant and non-immigrant employment; international adoptions; and humanitarian programs. Ordinarily, USCIS personnel interact directly with the public in USCIS field offices, asylum offices, and application support centers, conducting in-person interviews, naturalization oath ceremonies, and informational appointments. However, on March 11, 2020, the World Health Organization declared the Coronavirus



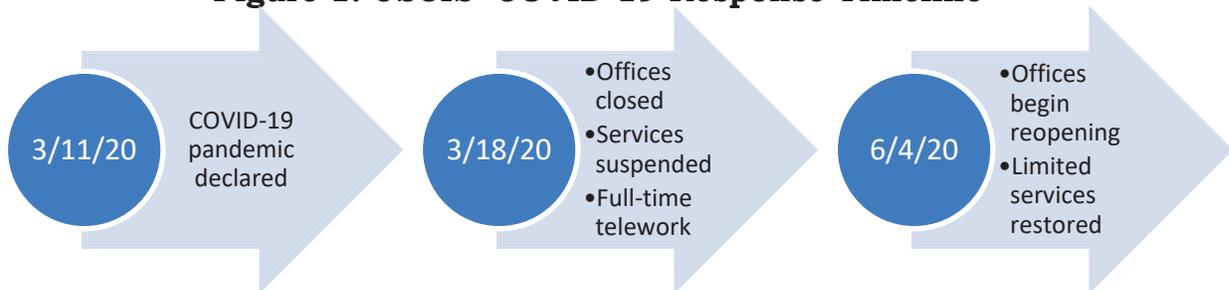
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disease 2019 (COVID-19) an international pandemic.¹ According to DHS, the persistent opportunity for infection to spread makes any biological incident a threat to the DHS workforce and its mission. The nature of USCIS' public-facing mission places personnel in frequent contact with the community, potentially including persons infected with, or exposed to, COVID-19.

USCIS quickly adapted its mission and adjusted day-to-day operations as the pandemic began. To protect its workforce and continue its mission-essential functions,² USCIS temporarily closed its offices, suspended in-person services,³ and authorized full-time telework for most of its workforce on March 18, 2020. On June 4, 2020, USCIS began a phased reopening of its offices and began restoring some in-person services, subject to pandemic-related protocols and restrictions. Figure 1 shows the timeline for USCIS' response to COVID-19.

Figure 1. USCIS' COVID-19 Response Timeline



Source: DHS OIG analysis of USCIS-provided data

As part of the benefit adjudication and delivery process, USCIS uses a wide variety of information technology (IT) systems, databases, and tools that obtain information from case management systems. Three primary systems used for case processing are:

- Electronic Immigration System (ELIS) – USCIS' digital case processing platform that integrates enterprise services and data from other source systems. USCIS personnel use ELIS for end-to-end electronic case management, document review and upload, document production, workload distribution, and workflow management. At the time of this audit, ELIS was capable of processing 17 benefits types/forms, as listed in Appendix C. Of the nearly 7.6 million cases USCIS completed in FY 2020, more than 2.8 million were processed electronically using ELIS.

¹ DHS defines a pandemic as a worldwide epidemic when a new virus, bacteria, or other pathogen emerges, for which humans have little or no immunity, and can be readily infected.

² USCIS defines mission essential functions as a limited set of Government functions that must be continued and may be interrupted for only very short periods of time.

³ USCIS' in-person services include collection of fingerprints and photographs, applicant interviews, and naturalization oath ceremonies.



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Department of Homeland Security

- Global (not an acronym) – USCIS’ case management system for asylum and refugee adjudications⁴ and pre-screening interviews. Deployed in 2018, Global is a cloud-based system that replaced two legacy mainframe systems⁵ and digitized certain processing requirements, such as applicant status checks, electronic form review and generation of documents, and collection of electronic signatures during asylum interviews.
- Computer Linked Application Information Management System 3 (CLAIMS 3) – a legacy case management system USCIS staff use for case processing and adjudication of more than 50 benefit types and forms.

We conducted this audit to determine the effectiveness of USCIS’ technology systems to provide timely and accurate electronic processing of immigration and naturalization benefits during office closures and reduced service capacities during the COVID-19 pandemic.

⁴ USCIS adjudicates asylum and refugee applications submitted on Form I-589, *Application for Asylum and for Withholding of Removal*; I-590, *Registration for Classification as Refugee*; or Form I-881, *Application for Suspension of Deportation or Special Rule Cancellation of Removal*.

⁵ Asylum Pre-Screening System (APSS) and Refugees, Asylum, and Parole System (RAPS).



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Results of Audit

USCIS' technology systems and infrastructure enabled some electronic processing of benefits to continue from March 2020 through May 2021, despite offices being closed or operating at reduced capacity during the COVID-19 pandemic. USCIS used its ELIS to continue electronically processing 17 of the 102 types of benefits it delivers. USCIS also relied on various operational flexibilities, such as virtual interviews and biometrics reuse, to continue benefits delivery during this time. We attribute these successes to USCIS' recent planning efforts to ensure continuity of operations, as well as its ongoing efforts to transition to an electronic processing environment.

USCIS' primary operational challenge, however, was its continued reliance on paper files to process and deliver benefits. USCIS had limited capability to electronically process more than 80 types of benefits, which still required some manual workflows and paper files to complete cases. Recurring technology performance issues and equipment limitations further constrained USCIS employees' productivity. We attribute these challenges to funding cuts and lost fee revenue that limited spending during this time.

These challenges further increased processing times and resulted in a backlog of 3.8 million cases as of May 2021. Although USCIS digitized key benefits in recent years, it must further eliminate manual workflows and paper file dependency to achieve its 5-year plan to improve benefit processing times.

USCIS Successfully Processed Some Benefits during the COVID-19 Pandemic

USCIS continued processing a limited number of benefits using ELIS, along with other technologies and workarounds, that enabled virtual operations to continue during the COVID-19 pandemic. We attribute USCIS' ability to maintain benefits processing and delivery to its effective planning and rapid engagement by leadership.

ELIS Provided Electronic Processing for a Limited Number of Benefits

ELIS provided USCIS with end-to-end electronic capability to process 17 of the 102 benefits and forms it manages. According to USCIS officials, when offices closed on March 18, 2020, USCIS shifted employee efforts toward completing the benefits and form types that could be processed electronically. Using ELIS, USCIS personnel worked on benefit types not requiring in-person interviews or cases that could be adjudicated without requiring physical interaction with



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Department of Homeland Security

applicants. According to some senior USCIS officials and adjudication officers⁶ around the country, ELIS was instrumental to staff continuing benefits delivery during the pandemic. During April and May 2020, while USCIS offices were closed, field office personnel processed more than 108,000 cases using ELIS, which included more than 11,200 naturalization applications and more than 21,600 family-based applications to register permanent residence or adjust status,⁷ two of the highest volume applications in USCIS' total backlog of 3.1 million cases.

USCIS personnel also benefited from recent updates to ELIS. During 2020 and into 2021, USCIS' Office of Information Technology (OIT) continued to enhance ELIS capabilities to better-support remote work, including the electronic distribution of digital case workloads across all field offices and service centers in any geographic region. OIT also upgraded ELIS' tablet-based features to enable digital signatures and electronic scoring of English and civics testing of naturalization applicants during video interviews.

Other Technologies and Flexibilities Enabled Benefits Delivery Operations to Continue

USCIS also quickly enhanced certain procedures and introduced workarounds to address pandemic-related challenges to its operations. From March 18 until June 3, 2020, USCIS offices were closed to the public, in-person appointments were canceled, and no new appointments were scheduled.⁸ As its offices reopened and services resumed, USCIS authorized and introduced revised operational procedures, such as video interviews⁹ for certain naturalization, asylum, and refugee cases, naturalization oath ceremony flexibilities, and the reuse of certain biometrics data.¹⁰ Supervisors and staff from many directorates and program offices we met with said remote work options and flexibilities were critical to continuing operations while USCIS offices were closed. The following examples illustrate USCIS' use of technology and modified procedures.

⁶ Adjudication officers review benefit applications and determine applicant eligibility for benefits such as immigration, employment, and legal status.

⁷ N-400, *Application for Naturalization* and I-485, *Application to Register Permanent Residence or Adjust Status*.

⁸ USCIS continued to schedule emergency in-person appointments through its Contact Center.

⁹ USCIS defines a video interview as an interview in which an applicant and interviewing officer are in different physical spaces within a field office and are communicating using video technology.

¹⁰ According to USCIS, biometrics reuse occurs when it uses fingerprints, a photograph, or a signature, individually or in combination, collected for one application, petition, or benefit request, to satisfy an associated biometric requirement on a different request.



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- Video Interviews – FOD and RAIO offices began using select technology to conduct remote interviews during the pandemic. Video interviews include technology equipment such as computers and monitors, iPad tablets, web cameras, microphones, printers, and internal or headset speakers. As of January 2021, FOD had conducted more than 42,000 video interviews for naturalization cases, and by February 2021, RAIO’s Asylum Division had completed more than 14,000 interviews using video interview technology.
- Biometrics Reuse – On May 6, 2020, USCIS changed its biometrics policy to mitigate Application Support Center (ASC) closures and subsequent reopening at reduced capacity due to the pandemic. Using specific requirements,¹¹ USCIS authorized fingerprint and photograph reuse for persons submitting applications, petitions, or benefit requests, without the need for in-person identity verification at an ASC. During the first half of FY 2021, USCIS reused biometrics from more than 1.1 million applicants, enabling adjudications to continue during ongoing pandemic-based limitations.
- Naturalization Oath Ceremonies – In May 2020, field offices introduced abbreviated, nontraditional naturalization oath ceremony procedures to address a backlog of approximately 110,000 ceremony appointments canceled due to office closures. Prioritizing the oldest pending cases, USCIS authorized a variety of flexible arrangements based on individual preferences and feasibility. These included small-group ceremonies; counter ceremonies, which occurred at field office information counter stations; and curbside ceremonies, which occurred outside a field office while guests remained in their cars. By August 2020, USCIS had administered the oath of allegiance to nearly every naturalization applicant whose ceremony had been postponed during office closures. As the pandemic continued, USCIS continued to use these flexible practices to promote safety and efficiency.

Additionally, some directorates and local USCIS offices implemented specific workarounds to enable work to continue remotely. For example, most FOD, RAIO, and SCOPS offices employed a curbside file pickup option for teleworking employees. To execute this process, participating local offices designated specific areas and procedures to retrieve paper files and supplies

¹¹ Requirements include 1) the case is otherwise ready for adjudication but cannot proceed due to lack of current biometrics; 2) the applicant previously submitted fingerprints and a photograph at an ASC or other authorized site; 3) there is an exact file number, name, and date of birth match between the pending filing and previous filing from which the biometrics were collected; and 4) the applicant was scheduled for an ASC appointment before USCIS office closures or filed a benefit request with a biometrics requirement after March 18, 2020.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

from their offices. Officials from SCOPS and RAI0 said they created an online tool using USCIS' Enterprise Collaboration Network for adjudication officers to submit and manage requests for curbside file pick-up, drop-off, or home delivery to receive their workloads. This enabled employees to schedule appointments for file pickup and return, supporting safety and pandemic restrictions.

Success during COVID-19 Pandemic Attributed to USCIS' Recent Planning Efforts

We attribute USCIS' ability to continue operations to its detailed pandemic plan,¹² as well as its continued efforts to transition away from paper-based processing. DHS requires its components, including USCIS, to maintain a plan that provides for the continuity of mission-essential functions and identifies specific activities to protect the workforce.¹³ In accordance with departmental guidance, during March 2020, USCIS updated its detailed pandemic plan to ensure operations would continue. The plan laid out specific guidance and requirements intended to protect the workforce and the public during a significant health emergency. The plan also specified USCIS' mission-essential functions, including:

- issuing immigration benefits and documentation;
- providing analysis of time-sensitive immigration information; and
- identifying national security or public safety sensitive immigration cases.

Likewise, USCIS has taken steps to transition from a paper-based to a digital environment and to improve data accessibility and workload management. In FY 2018, USCIS revised its technology transformation approach¹⁴ and restructured program management to align system development efforts with the operational directorates. Following remediation efforts¹⁵ and an operational assessment,¹⁶ USCIS determined ELIS met operational needs and performed as required to support USCIS' mission. According to an IT program official, working primarily with FOD and SCOPS, OIT prioritized the highest volume case workloads to develop new capabilities for end-to-end electronic processing using ELIS.

¹² *USCIS Pandemic and Emerging Infectious Disease Workforce Protection Plan*, No. OP 094-002, March 15, 2020.

¹³ *Department of Homeland Security Pandemic and Emerging Infectious Disease Workforce Protection Plan*, Version 2.0, October 7, 2016.

¹⁴ *USCIS Office of Information Technology Transformation Program Electronic Immigration System Concept of Operations*, Sept. 19, 2017.

¹⁵ Remediation efforts included resetting contractor expectations; improving I-90 and N-400 forms for processing; moving to a standard development and operations model; establishing governance and documentation; and improving testing and database architecture.

¹⁶ *USCIS Operational Assessment 4, Transformation Program – ELIS*, May 7, 2019.



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Having these plans in place enabled USCIS leadership to publish timely, detailed policies and procedures to guide its implementation of operational modifications. On March 12, 2020, USCIS implemented a telework policy waiver, authorizing its employees to work from home or other approved locations away from the office. This enabled employees to perform mission-essential services that did not require in-person contact with applicants. Subsequently, during May 2020, USCIS published a management directive¹⁷ governing its temporary biometric reuse policy to mitigate ASC closures during the COVID-19 pandemic. Likewise, FOD and RAIO issued guidelines to administer video interview procedures.¹⁸

USCIS' Continued Reliance on Manual Processing Impeded Operations during the COVID-19 Pandemic

USCIS' primary operational challenge during the COVID-19 pandemic was the continued need for USCIS personnel to handle paper to process cases. Although USCIS has made progress toward digital transformation, most benefit applications, petitions, and forms still require paper files and documents to support manual workflows. As of April 2021, more than 80 benefits and forms still required some manual processing by USCIS staff.

Cases that could not be completed by electronic processing were delayed by office closures and, upon reopening, staff's limited access to facilities. To illustrate, USCIS' field offices completed approximately 50 percent fewer cases from March to June 2020 during temporary office closures, as compared with the same timeframe during 2019. From March through June 2020, USCIS processed approximately 335,000 cases.¹⁹ From March through June 2019, the same period 1 year before, field offices processed more than 670,000 cases. Figure 2 shows the comparison of total cases processed by USCIS' field offices from March through June 2019 and March through June 2020.

¹⁷ USCIS Management Directive No. 119-011, *Biometric Policy Changes to Mitigate Application Support Center (ASC) Closures During the COVID-19 Pandemic*, May 6, 2020.

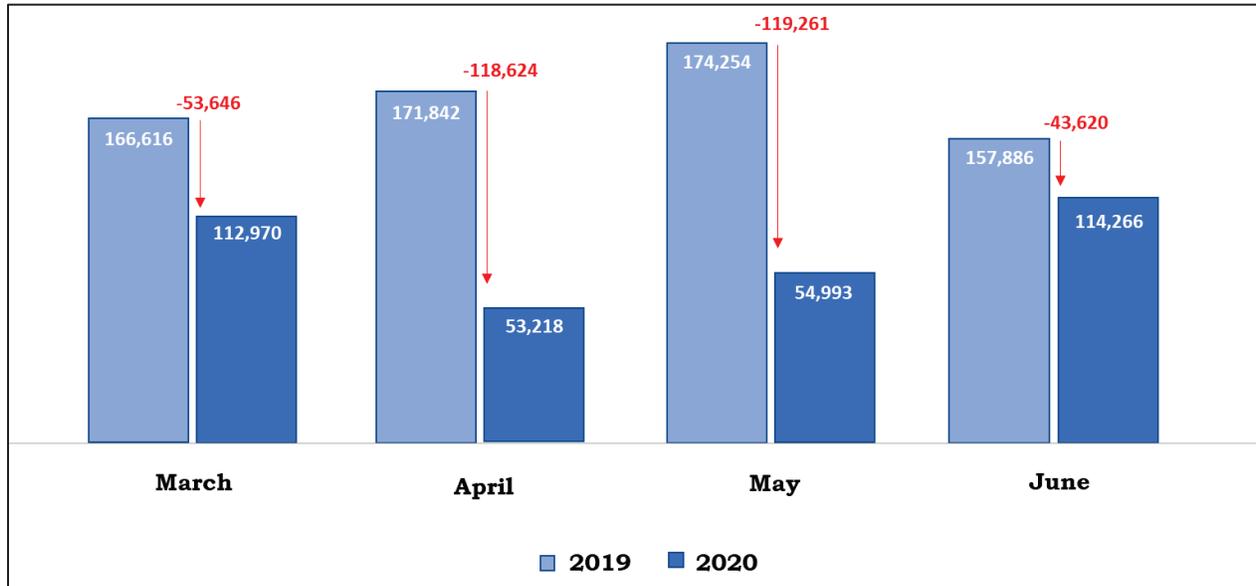
¹⁸ *FOD Video Interview Processing Guide*; *FOD Office-to-Office Supplemental Processing Guide*; and USCIS Asylum Division Video-facilitated Interviews Standard Operating Procedures.

¹⁹ This figure includes cases processed both manually and electronically by USCIS field offices.



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**Figure 2. Total Cases Processed by Field Offices
March to June 2019 and March to June 2020**



Source: DHS OIG analysis of USCIS-provided data

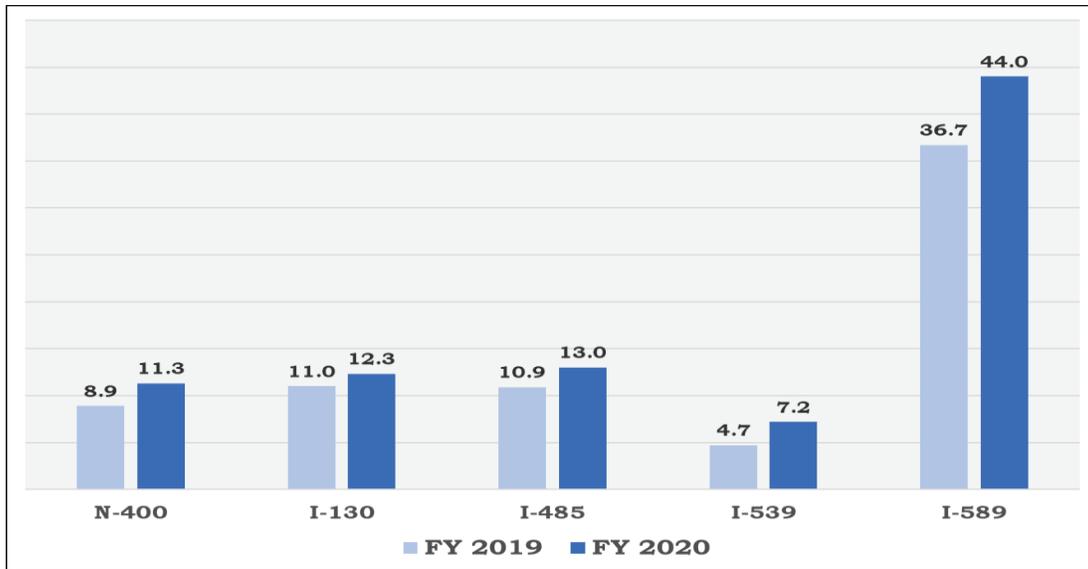
USCIS experienced a decline of approximately 33 percent in the pace of case processing in 2020, even after offices reopened. From July 2020 through February 2021, field offices processed, on average, nearly 110,300 cases each month — nearly 55,000 fewer cases per month than the same 8-month period the year before. Figure 3 shows FY 2019 and FY 2020 processing times, measured in months, for cases with the largest backlogs²⁰ pending adjudication.

²⁰ USCIS defines backlog as the volume of pending applications that exceed the level of acceptable pending cases. The number of acceptable pending cases is compared to the volume of applications received during target time periods for processing each type of application. For example, if the Form N-400 processing time is 5 months, the acceptable pending volume is equal to the last 5 months of applications received.



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Figure 3. Benefit Case Processing Times in Months, FY 2019 and FY 2020²¹



Source: DHS OIG analysis of USCIS data

Senior officials from the adjudicative directorates (FOD, RAIO, and SCOPS) agreed that USCIS’ biggest operational challenge was the dependency on paper to process cases. Although office facilities began reopening in June 2020, staff had limited opportunities to obtain paper files and to perform a number of required in-office duties. For example, between March 2020 and May 2021, as the COVID-19 pandemic continued, staff had limited opportunities to accomplish traditional processing tasks such as printing and scanning documents, routing paper documents for supervisory review and signature, and mailing forms to applicants. Also, USCIS employees did not always have the necessary access to paper files and documents. Adjudication officers we interviewed stated that accessing paper files during office closures significantly slowed their pace of benefits delivery.

USCIS officials and adjudication officers said USCIS’ other case management systems, Global and CLAIMS 3, supported partial electronic processing of benefits during the pandemic, but neither system was capable of end-to-end electronic processing like ELIS. In particular:

- The introduction of Global reportedly improved adjudication officers’ ability to complete their work electronically during the pandemic.

²¹ The numbers represented processing times for the following forms: N-400, *Application for Naturalization*; I-130, *Petition for Alien Relative*; I-485, *Application to Register Permanent Residence or Adjust Status*; I-539, *Application to Extend/Change Nonimmigrant Status*; and I-589, *Application for Asylum and for Withholding of Removal*.



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According to USCIS, Global reduced manual data entry by 70 percent over prior systems, improved automation of security and background checks, and reduced response times up to 95 percent. However, Global is not capable of end-to-end electronic processing. According to RAIO's technology program office, electronic processing of Form I-589, *Application for Asylum and for Withholding of Removal*, is scheduled for implementation in Global during FY 2022, but the process will not be entirely paperless, as applicants will still be permitted to submit paper applications and supporting documents. Also, according to RAIO, Forms I-590, I-881, I-730, and I-131 still require paper-based processing.

- USCIS has added a number of electronic capabilities²² to CLAIMS 3 since FY 2019 and has plans to modernize system capabilities with a web-based solution. However, the mainframe-based system relies predominantly on paper-based workflows and is incapable of real-time interface with other USCIS systems. For example, adjudication officers use CLAIMS 3 to view files and documents electronically, but notices and responses must be generated using paper. USCIS planned to digitize benefits and forms processed with CLAIMS 3, including Forms I-601, I-751, and I-765, but this effort was incomplete at the time of our fieldwork.

In September 2020, the *Emergency Stopgap USCIS Stabilization Act*²³ directed the Secretary of Homeland Security to provide a 5-year plan to establish electronic filing procedures for all benefit applications and petitions, electronically issue benefits correspondence, and improve benefits processing times. On September 8, 2021, DHS submitted its final plan to Congress.

USCIS' Technology Infrastructure and IT Equipment Further Hindered Workforce Effectiveness

In June 2020, when USCIS offices began to reopen, adjudications staff experienced recurring technology performance issues that affected their ability to complete work timely. Some of USCIS' key technology systems experienced performance interruptions or degradation during the pandemic, which frequently delayed adjudication work. For example, from March 2020 through May 2021, OIT records indicate USCIS' case management systems experienced outages or periods of degraded performance that affected USCIS' operations. Table 2 shows the approximate number of hours key systems were affected from March 2020 through May 2021.

²² USCIS added receipt of certain electronically filed applications, retrieval of case-specific content, and electronic tracking of immigration file locations.

²³ *Continuing Appropriations Act, 2021 and Other Extensions Act*, Pub. L. No. 116-159, 134 Stat. 709 (2020).



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Table 2. Case Management System Periods of Outage and Degraded Performance, March 2020 to May 2021

Technology System	Approximate Number of Hours
ELIS	2,076 hours
Global	50 hours
CLAIMS 3	183 hours

Source: DHS OIG-created using USCIS data

USCIS' supporting technology systems also posed operational challenges during the pandemic. For example, USCIS' National Appointment Scheduling System (NASS), used to schedule applicants for biometric data collection,²⁴ interviews, and naturalization oaths at USCIS facilities, did not interface with ELIS and Global. According to ASC officials, NASS was developed to schedule appointments on a first-in, first-out basis. However, the complexities of USCIS' pandemic response required scheduling flexibilities beyond NASS' capability, such as when ASC Operations staff had to manually schedule appointments to meet mandated priorities for rescheduling previously canceled appointments, or when addressing benefits prioritized by the adjudicative directorates.

Also, some field office personnel said they experienced slow response from CLAIMS 3 while working remotely. According to the OIT, working outside the office meant USCIS personnel had to access CLAIMS 3 using virtual desktop infrastructure (VDI),²⁵ which was hosted at one of USCIS' service centers.²⁶ But, because CLAIMS 3 is a mainframe system, it does not integrate with cloud-based systems such as ELIS and Global. According to OIT, early in the pandemic, the DHS virtual private network (VPN)²⁷ infrastructure had limited capacity for the increased demand of USCIS workforce working remotely. According to an IT program official, during this time, CLAIMS 3 users frequently lost VPN connections, which then dropped VDI connections to CLAIMS 3. The same official said when this occurred, VDI user sessions remained active for 40 minutes before automatic termination, but most users managed to quickly reconnect to VPN and VDI, which duplicated the number of active VDI sessions and overloaded the virtual environment. Some field adjudication officers we met with stated VDI access was slow and unreliable

²⁴ Biometric data collected from applicants includes fingerprints, photographs, and signatures.

²⁵ Virtual desktop infrastructure is the software, hardware, and other resources required for the visualization of a standard desktop system, which is hosted on a remote service over the Internet.

²⁶ USCIS has service centers in California, Nebraska, Texas, Vermont, and Virginia.

²⁷ A VPN is a private computer network that functions over a public network, such as the Internet, that uses data encryption to provide secure access to an internal private network.



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and required extra time to effectively complete required work. A senior OIT official compared the slowness of using VDI to a dial-up Internet connection. Additionally, USCIS personnel said they did not have technology equipment needed to complete benefit delivery work outside the office. FOD and RAIO adjudication officers stated that, to adjudicate cases timely, they must simultaneously view and interact with multiple IT applications, but the small size of the laptop computer monitors issued to USCIS teleworkers did not support such use. To overcome this, adjudication officers said they used personal monitors at home or monitors they bought using personal funds. In September 2020, OIT began to issue 22-inch monitors to staff in the Washington, D.C. area on a first-come, first-served basis. However, adjudication officers in the field were not issued monitors for home use. FOD and RAIO adjudication officers said they were not issued printers or document scanners needed to process cases not fully digitized for electronic processing. Instead, officers said they queued completed documents for printing when next visiting the office, which delayed workflow requirements and routing for supervisory review and final approval or denial of benefits.

Additionally, upon reopening, field and asylum offices did not have a sufficient number of tablet devices to support video interviews. According to OIT's Field Services Division, USCIS repurposed more than 1,300 iPad devices to support FOD and RAIO video interviews, but adjudication officers said these devices were outdated and incapable of functioning effectively with Microsoft Teams, the conferencing application used for video interviews. An OIT official said the recent change to video interviews increased the demand for iPads, which were not part of the standard IT equipment refresh cycle, and the devices USCIS had in stock were no longer supported by the current Apple operating system.

Technology Challenges Attributed to Funding Shortfalls

We attribute USCIS' technology challenges to significant funding shortfalls. Unlike other DHS components, USCIS is predominantly fee-funded, receiving approximately 97 percent of its annual funding from fees charged to applicants requesting immigration and naturalization benefits. USCIS relies on this predictable fee revenue and its carryover funding from the previous year. However, as the COVID-19 pandemic began, USCIS faced significant fiscal insecurity²⁸ that affected operational funding and planned activities across the component.

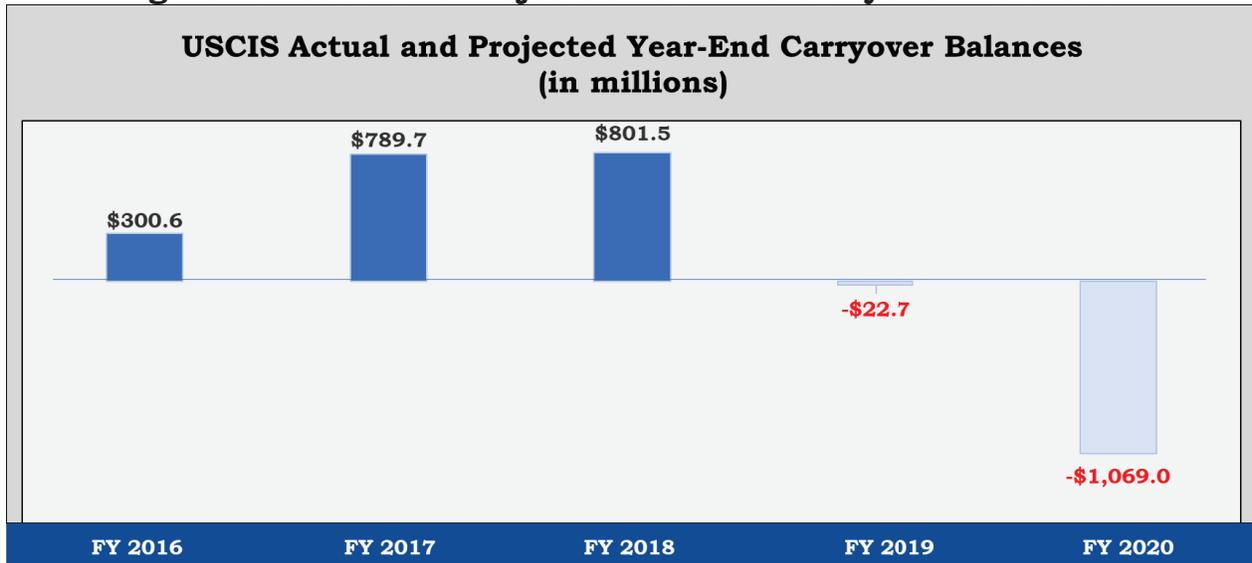
²⁸ FY 2020 fiscal insecurity resulted from limited FY 2019 carryover funding and a new fee rule, which was scheduled to become effective October 2, 2020, and would have increased fee revenue but was halted nationwide through court action, leaving USCIS without new fees to keep pace with costs.



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Figure 4 shows USCIS’ year-end carryover balances from FY 2016 through FY 2018, and projected balances for FY 2019 and FY 2020²⁹ (includes only non-premium processing fees³⁰).

Figure 4. Actual and Projected Year-End Carryover Balances³¹



Source: DHS OIG-created using USCIS data

Then, in March 2020 when the COVID-19 pandemic began, a reduction in benefit applications sharply reduced fee revenue, which exacerbated USCIS’ fiscal constraints. USCIS imposed extensive cost-cutting measures to mitigate impacts, including a component-wide 32 percent funding reduction of all non-payroll expenses. According to OIT officials, planned IT system enhancements and new electronic processing solutions were postponed when USCIS removed \$118 million from OIT’s budget for ELIS and Global development, and modernization of CLAIMS 3 and other systems, including NASS.

Additionally, in a deeply restrictive fiscal environment, planned technology development and enhancements were sidelined. An OIT official stated that, facing a budget reduced by more than \$100 million, OIT increased its IT equipment lifecycle by a full year, replacing items such as laptops and tablet

²⁹ Fees collected from benefit applicants are deposited into the Immigration Examinations Fee Account and used to fund the cost of processing benefit requests. USCIS reviews its fees biennially and adjusts them to recover the full operating costs associated with administering the nation’s immigration system.

³⁰ The USCIS premium processing service allows applicants to pay an additional filing fee to expedite adjudication of certain forms, generally within 15 days.

³¹ The projected totals for FY 2019 and FY 2020 represent carryover balances based on USCIS spending in accordance with the final fee rule published in August 2020. However, based on court injunction of the fee rule in October 2020, USCIS did not spend at the projected levels.



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devices every 5 years instead of the normal 4-year cycle. Also, according to RAIO's technology office, \$4.7 million was removed from its technology budget, which delayed plans to digitize case processing work. OIT also cut contract support, reduced software and license procurements for system monitoring and incident management, and lost development capacity to digitize additional benefit workloads.

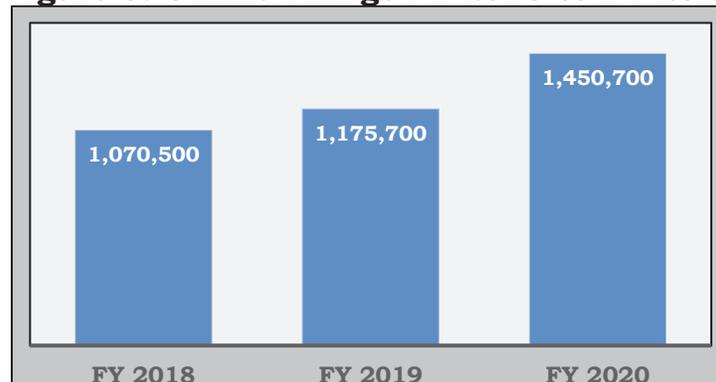
Finally, according to an IT program official, OIT was unable to provide appropriate IT equipment capable of supporting employees' mission needs to complete required work. Information provided by OIT indicated that from June 2020 through May 2021, additional iPads had not been purchased to better support video interviews in the field. Instead, FOD and RAIO officers said they used older devices that were repurposed early during the pandemic.

Processing Times and Case Backlogs Increased during the COVID-19 Pandemic

Until USCIS digitizes all benefits for electronic processing, technology systems will not be fully effective in supporting processing during national emergencies or keep pace with the increasing demand for digital Government services. For example, USCIS has experienced an increasing number of benefit applications and fees filed online since FY 2018, when large scale electronic filings began.

To illustrate, more than 1.45 million benefit applications were filed online during FY 2020, an increase of more than 20 percent over online filings during FY 2019. Figure 5 shows the total number of online filings since FY 2018.

Figure 5. Online Filings FY 2018 to FY 2020



Source: DHS OIG-created using USCIS data

The COVID-19 pandemic further emphasized the need for USCIS to fully digitize benefits delivery. When the COVID-19 pandemic began in March 2020, USCIS was already working on a backlog of nearly 2.5 million cases. By the end of May 2021, the case backlog had increased to approximately 3.8 million



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Department of Homeland Security

cases needing to be processed. As of April 2021, ASCs had nearly 850,000 applicants awaiting appointments for biometric data collection due to office closures and ongoing service limitations. In addition, ASCs were still limited to 70 percent capacity due to ongoing social distancing requirements. Notably, a USCIS program official said ASCs had no backlog for biometrics collection before the pandemic began.

Our findings show USCIS made strong progress in recent years to fully digitize key benefits and forms, but much work remains. To ensure its 5-year strategy to digitize workflows and improve case processing times is effective and properly executed, USCIS must develop and implement a holistic plan to track progress and milestones and to measure and assess system performance across its technology enterprise.

Recommendations

We recommend the Director of USCIS:

Recommendation 1: Update the USCIS pandemic plan to incorporate additional technology guidance and lessons learned during the COVID-19 pandemic.

Recommendation 2: Develop an updated strategy for digitizing all benefits work and tracking the outcome of improving case processing times, including a detailed funding plan, in accordance with the *Emergency Stopgap USCIS Stabilization Act*.

Management Comments and OIG Analysis

USCIS provided written comments in response to a draft of this report. We reviewed USCIS' comments, as well as technical comments, and made changes to the report, as appropriate. USCIS concurred with both recommendations. We have included a copy of the comments in their entirety in Appendix B. A summary of USCIS' responses and our analysis follows.

USCIS Response to Recommendation 1: Concur. USCIS Office of Security and Integrity's Mission Integrity Division personnel will write an after-action report focusing on lessons learned from the COVID-19 pandemic response. Once the after-action report is published, USCIS will issue a revised *Pandemic and Emerging Infectious Disease Workforce Protection Plan* that will include lessons learned and additional technology guidance, where applicable. The estimated completion date is December 30, 2022.



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Department of Homeland Security

OIG Analysis: We acknowledge USCIS' plan to document lessons learned from its COVID-19 pandemic response and revise its *Pandemic and Emerging Infectious Disease Workforce Protection Plan*. We look forward to reviewing the after-action report and updated plan, including applicable technology updates. We consider this recommendation resolved, but it will remain open until USCIS provides documentation showing completed updates.

USCIS Response to Recommendation 2: Concur. The USCIS strategy for transitioning applications and petitions for immigration benefits from paper-based to electronic end-to-end processing was in draft status and pending final clearance and transmittal to the Congress during OIG's fieldwork for this report. On September 8, 2021, however, DHS transmitted to Congress the report on digitizing USCIS' workload, which outlines the 5-year strategy to fully digitize USCIS' workload from submission, through adjudication, to completion. The report includes all three elements of this recommendation: the digitization strategy; a performance measure to track improvements in processing times; and a funding plan. USCIS requested this recommendation be considered resolved and closed, as implemented.

OIG Analysis: We acknowledge the September 2021 transmission of USCIS' 5-year strategy to Congress, in accordance with the *Emergency Stopgap USCIS Stabilization Act*. Our analysis indicated the strategy contains a digitization strategy, a performance measure to track processing time improvements, and a funding plan. We find USCIS' plan, as published to Congress, sufficiently addresses the performance aspects of this recommendation. Recommendation 2 is resolved and closed.



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Appendix A

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107-296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine the effectiveness of USCIS' technology systems to provide timely and accurate electronic processing of immigration and naturalization benefit requests while field offices, asylum offices, and application support centers were closed or operating with a reduced workforce during the COVID-19 pandemic.

This audit was conducted in response to a June 2020 congressional request asking OIG to review the continuity of operations plans for USCIS' mission-critical duties in response to the COVID-19 pandemic. During this audit, we focused on USCIS' technical capabilities and approach to processing immigration and naturalization benefits during the COVID-19 pandemic, including technology systems and tools used for electronic processing. We determined whether certain benefits were unable to be processed virtually and, thus, may have been suspended due to pandemic-related office closures and reduced in-person services. We identified other pandemic-related challenges and determined whether USCIS had an effective pandemic plan in place to provide mission-essential functions remotely, in response to a major emergency or national event, such as a pandemic.

We researched and applied Federal, departmental, and component criteria related to USCIS' mission, responsibilities, and IT effectiveness. We obtained and analyzed reports, testimony, and other documents pertaining to USCIS' use of technology to support operations. Additionally, we reviewed Government Accountability Office and DHS OIG reports to identify relevant findings and recommendations, and associated follow-up actions.

We used documentary and testimonial evidence to evaluate whether USCIS had adequate policies, procedures, and IT system capabilities in place to ensure immigration benefits were processed timely and accurately during the pandemic. We collected and analyzed more than 300 documents and met with more than 180 personnel from USCIS Headquarters, Immigration Records and Identity Services Directorate; RAIO; FOD; Service Center Operations Directorate; Fraud Detection and National Security Directorate; OIT; Office of Contracting; Office of Human Capital and Training; and Office of the Chief Financial Officer. We also interviewed officials from the Office of the Citizenship and Immigration Services Ombudsman. During our meetings, we



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interviewed senior executives, management officials, adjudication officers, IT program specialists, and legal and mission support specialists.

We conducted this performance audit between January 2021 and May 2021 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



OFFICE OF INSPECTOR GENERAL
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Appendix B
USCIS Comments to the Draft Report

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of the Director (MS 2000)
Camp Springs, MD 20588-0009



**U.S. Citizenship
and Immigration
Services**

December 15, 2021

MEMORANDUM FOR: Joseph V. Cuffari
Inspector General

FROM: Ur M. Jaddou UR M
Director JADDOU Digitally signed by UR M
U.S. Citizenship and Immigration Services JADDOU
Date: 2021.12.16
13:03:11 -05'00'

SUBJECT: Management Response to Draft Report: “Continued Reliance on Manual Processing Slowed USCIS' Benefits Delivery During the COVID-19 Pandemic” (Project No. 20-063-AUD-USCIS)

Thank you for the opportunity to comment on this draft report. U.S. Citizenship and Immigration Services (USCIS) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

USCIS is pleased to note OIG’s recognition of USCIS’ successes related to detailed planning efforts associated with continuity of operations as well as continued efforts to transition away from paper-based processing. USCIS remains committed to transitioning applications and petitions for immigration benefits from paper-based to electronic end-to-end processing.

However, USCIS believes that additional context is needed in the OIG’s final report regarding USCIS’ carryover of funds. Specifically, the graphic on page 14 of the draft report, “Figure 4: Actual and Projected Year-End Carryover Balances,” reflects the projected carryover in fiscal year (FY) 2019 and FY 2020 if USCIS had spent at the planned levels included in 85 FR 46788, “U.S. Citizenship and Immigration Services Fee Schedule and Changes to Certain Other Immigration Benefit Request Requirements” (FY 2019/2020 Fee Rule). It is important to more clearly note that the FY 2019/2020 Fee Rule was not published until August 2020, and was subsequently subject to a court-ordered injunction in October 2020 pending a hearing on the merits of the case.



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Therefore, USCIS did not spend in accordance with the FY 2019/2020 Fee Rule and instead instituted budget reductions.¹

Additionally, the 5-year plan to improve benefit processing times required by the September 2020 Emergency Stopgap Stabilization Act was only in a draft status when it was requested by the OIG on June 7, 2021, as part of fieldwork for this audit, and provided that same day by the USCIS Office of the Chief Financial Officer. USCIS has since finalized and began to implement the plan, which was transmitted to Congress on September 8, 2021, more than two months before the November 18, 2021, Exit Conference for this draft report, during which USCIS updated the OIG regarding the status of the plan. USCIS requests that the OIG update its final report to recognize this status change.

The draft report contained two recommendations, with which USCIS concurs. Attached find our detailed response to each recommendation. USCIS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment

¹ USCIS suggests that the OIG add the following footnote to the final report to provide a more appropriate context for this information: "The carryover graphic represents a scenario of what USCIS' projected carryover would have been if the Agency spent in accordance with the FY 2019/2020 fee rule and didn't increase its fees. However, due to the timing of the publication date for a new Fee Rule and the subsequent injunction of the Fee Rule, USCIS did not spend at the levels planned in the FY 2019/2020 Fee Rule and instead implemented budget reductions."



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Department of Homeland Security

Attachment: Management Response to Recommendations Contained in 20-063-AUD-USCIS

OIG recommended that the Director of USCIS:

Recommendation 1: Update the USCIS pandemic plan to incorporate additional technology guidance and lessons learned during the COVID-19 pandemic.

Response: Concur. The USCIS Office of Security and Integrity's Mission Integrity Division (OSI/MID) will write an after-action report (AAR) focusing on lessons learned from the COVID-19 pandemic response. Once the AAR is published, OSI/MID will update and issue a revised Pandemic and Emerging Infection Disease Workforce Protection Plan that will include lessons learned and additional technology guidance where applicable. Estimated Completion Date: December 30, 2022.

Recommendation 2: Develop an updated strategy for digitizing all benefits work and tracking the outcome of improving case processing times, including a detailed funding plan, in accordance with the Emergency Stopgap USCIS Stabilization Act.

Response: Concur. The USCIS strategy for transitioning applications and petitions for immigration benefits from paper-based to electronic end-to-end processing was in draft status and pending final clearance and transmittal to the Congress during OIG's fieldwork for this report. On September 8, 2021, however, the Department of Homeland Security transmitted to Congress the report on digitizing USCIS workload, as required by Section 4103 of the October 1, 2020, Public Law 116-159, "Continuing Appropriations Act, 2021 and Other Extensions Act," which outlines a five-year strategy to fully digitize USCIS' workload from submission, through adjudication, to completion. The report includes all three elements from Recommendation 2, the digitization strategy, a performance measure to track improvements in processing times and a funding plan. USCIS requests that the OIG consider this recommendation resolved and closed, as implemented.



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Appendix C
USCIS Digitized Forms as of April 2021

1. N-336, *Request for a Hearing on a Decision in Naturalization Proceedings*
2. N-400, *Application for Naturalization*
3. N-565, *Application for Replacement Naturalization/Citizenship Document*
4. N-600, *Application for Certificate of Citizenship*
5. N-600K, *Application for Citizenship and Issuance of Certificate Under Section 322*
6. I-90, *Application to Replace Permanent Resident Card*
7. I-129, *Petition for a Nonimmigrant Worker*
8. I-290B, *Notice of Appeal or Motion*
9. I-130, *Petition for Alien Relative*
- 10.I-131, *Application for Travel Document*
- 11.I-131A, *Application for Travel Document (Carrier Documentation)*
- 12.I-485, *Application to Register Permanent Residence or Adjust Status*
- 13.I-551, *USCIS Immigrant Fee payments and Green Card issuance*
- 14.I-765, *Application for Employment Authorization*
- 15.I-821, *Application for Temporary Protected Status*
- 16.I-821D, *Consideration of Deferred Action for Childhood Arrivals*
- 17.G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*



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Appendix D
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Appendix E
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