

Data Quality Improvements Needed to Track Adjudicative Decisions





DHS OIG HIGHLIGHTS

Data Quality Improvements Needed to Track Adjudicative Decisions

May 14, 2019

Why We Did This Audit

USCIS personnel enter adjudicative decisions into CLAIMS3, its electronic system of record. We assessed USCIS' process for recording adjudicative decisions in CLAIMS3 and how USCIS used the data to support its quality assurance, fraud monitoring, and reporting processes.

What We Recommend

We are making eight recommendations to improve the quality of adjudicative decisions recorded in CLAIMS3 and to address data reliability and monitoring issues.

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

U.S. Citizenship and Immigration Services (USCIS) has not implemented an effective process to track adjudicative decisions and ensure data integrity in its Computer Linked Application Information Management System (CLAIMS3). Federal standards and DHS requirements stress the importance of internal controls over data reliability and system access to achieve effective and efficient operations. However, USCIS cannot reliably trace adjudicative decisions recorded in CLAIMS3 back to the Immigration Services Officers responsible for those decisions. Our analysis of fiscal years 2015–2017 CLAIMS3 data showed that only 66 percent of adjudicative decisions could be tracked. This is due to USCIS' decentralized policy that allows service centers and field offices discretion in deciding which users can enter benefit decisions in the system. Additionally, USCIS did not implement adequate monitoring and system access controls to prevent intrusions and potential fraud. Instead, staff who are not officers have the same user access and privileges as Immigration Services Officers.

These weaknesses create data integrity issues and vulnerability to fraud. Further, the CLAIMS3 system itself is unreliable in supporting key management operations because of inadequate system functionality and quality control. The system does not support accurate management and productivity reporting necessary for sound management decision making.

USCIS Response

The USCIS Director concurred with all eight recommendations.

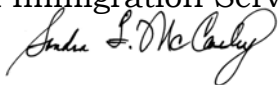


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Department of Homeland Security

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

May 14, 2019

MEMORANDUM FOR: The Honorable L. Francis Cissna
Director
U.S. Citizenship and Immigration Services

FROM: Sondra F. McCauley 
Assistant Inspector General for Audits

SUBJECT: *Data Quality Improvements Needed to Track
Adjudicative Decisions*

Attached for your action is our final report, *Data Quality Improvements Needed to Track Adjudicative Decisions*. We incorporated the formal comments provided by your office.

The report contains eight recommendations aimed at improving the quality of adjudicative decisions recorded in CLAIMS3 and addressing data reliability and monitoring issues. Your office concurred with all eight recommendations.

Based on information provided in your response to the draft report, we consider recommendations 1 through 3 open and unresolved. As prescribed by the Department of Homeland Security Directive 077-01, *Follow-Up and Resolutions for the Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation. Until your response is received and evaluated, recommendations 1 through 3 will be considered open and unresolved.

Further, based on information provided in your response to the draft report, we consider recommendations 4 through 8 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts.



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Please send your response or closure request to
OIGTAuditsFollowup@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 Quan Thai, Director, at (206) 271-3592.

Attachment



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Abbreviations

CLAIMS3	Computer Linked Application Information Management System
GAO	Government Accountability Office
ID	Identification
ISO	Immigration Services Officer
NIST	National Institute of Standards and Technology
OIG	Office of Inspector General
OSI	Office of Security and Integrity
USCIS	U.S. Citizenship and Immigration Services



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Background

U.S. Citizenship and Immigration Services (USCIS) grants immigration and citizenship benefits and ensures the integrity of the U.S. immigration system. Each year, USCIS processes millions of immigrant and nonimmigrant (non-citizenship) benefit applications and petitions (referred to in this report as applications) from foreign nationals seeking to study, work, immigrate, or become citizens of the United States. USCIS receives approximately 711,000 applications per month and roughly 8 million each year. On an average day, USCIS employees process more than 30,000 applications covering more than 90 types of immigration benefits, issue at least 7,000 permanent resident cards, and naturalize nearly 2,000 new citizens. This report covers immigrant and nonimmigrant benefits managed in the Computer Linked Application Information Management System (CLAIMS3).

Multiple USCIS program offices and directorates support immigrant and nonimmigrant benefit processing, including:

- The Field Operations Directorate, which oversees the National Benefit Center, 86 field offices, and 24 district offices nationwide. Field offices adjudicate applications requiring face-to-face interviews.
- The Service Center Operations Directorate, which oversees and manages five service centers. The service centers adjudicate applications that do not require face-to-face contact.
- The Fraud Detection and National Security Directorate, which conducts additional screening if a potential threat is identified during application processing.
- The Office of Performance and Quality, which provides data and operational analyses to senior decision makers to assist in developing operational policy and financial guidance.
- The Office of Investigations, which receives complaints pertaining to USCIS employee or contractor misconduct and plans, organizes, and conducts internal investigations.
- The Office of Security and Integrity's (OSI) Enterprise Risk Management Branch, which analyzes data to identify anomalies and potential internal fraud and is responsible for USCIS' internal inspections and fraud countermeasures program.



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USCIS uses CLAIMS3 to track and manage the adjudication process for most immigrant and nonimmigrant applications.¹ For many types of immigration benefits, CLAIMS3 is USCIS' authoritative case management system. USCIS uses CLAIMS3 to:

- electronically record and manage the applications received;
- record and track the history of actions taken on each application, including application and fee receipt, additional information requests, and final adjudication decisions; and
- provide leadership with information for management reporting and other statistics.

Because CLAIMS3 was a legacy mainframe system, USCIS has undertaken a modernization effort to make the system more viable, flexible, and sustainable.² The effort consists of multiple phases including:

- addressing security vulnerabilities;
- improving business processes;
- moving to a web-based platform; and
- consolidating the CLAIMS3 databases by the end of September 2019.

Adjudication Process

USCIS maintains both an electronic and paper system of record to document, manage, and track applications. USCIS does not use CLAIMS3 to adjudicate applications because the system cannot capture all the required supporting documents necessary to adjudicate most applications electronically. Immigration Services Officers (ISO) approve or deny immigration benefits. ISOs review and adjudicate applications, along with supporting documentation, using paper-based files.

The processing and adjudication of an application occurs in six stages, as shown in figure 1.

¹ USCIS uses the Refugees, Asylum, and Parole System to process refugee and asylum applications. Additionally, USCIS uses other systems, such as CLAIMS4 to manage naturalization applications and USCIS Electronic Immigration System to adjudicate a limited number of immigration benefits electronically.

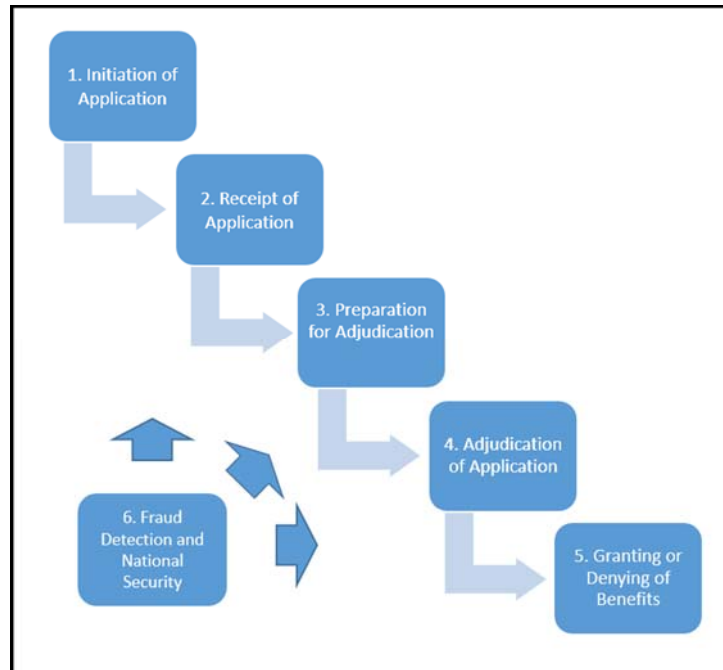
² A legacy system is an outdated or obsolete computer system that may still be in use because its data cannot be changed to a new or standard format, or its application programs cannot be upgraded.



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Figure 1: Six Stages of the Application and Adjudication Process



Source: Department of Homeland Security Office of Inspector General (OIG)-generated from USCIS data

The six stages of the application and adjudication process are:

1. **Initiation of Application:** An applicant submits an application, including the necessary supporting documents and fee payment, to USCIS.
2. **Receipt of Application:** USCIS staff or contractors review the application to ensure the applicant has submitted the correct fee. If the fee payment is correct, USCIS assigns a receipt number to the application and forwards it to the appropriate USCIS location.³
3. **Preparation for Adjudication:** USCIS staff or contractors review the application for completeness and manually input into CLAIMS3 some of the applicant's information, such as name, address, country of citizenship, current immigration status, and the benefit requested.⁴ If required, USCIS schedules an appointment for the applicant to provide biometrics, such as fingerprints. USCIS staff or contractors submit applicant or beneficiary names for initial background checks. An application packet is assembled and assigned to an ISO for adjudication.

³ If the fee payment is incorrect, USCIS rejects the application and notifies the applicant.

⁴ If the application is incomplete, USCIS notifies the applicant that it has suspended adjudication.



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4. **Adjudication of Application:** To begin the adjudication process, an ISO ascertains the applicant's eligibility for the benefit sought by reviewing the application packet and querying available USCIS, DHS, Department of State, and other publicly available systems. For specific types of benefits, USCIS may also require in-person applicant interviews.
5. **Granting or Denying of Benefits:** Based on the results of the adjudication and interview, if applicable, the ISO may approve the application, deny the application, or request additional evidence. USCIS policy requires decisions to be recorded in both the paper-based files and in CLAIMS3. Entering an approval decision in CLAIMS3 automatically generates an official notice informing the applicant of an action taken on his or her application. For certain benefits, the recording of an approval decision in CLAIMS3 also triggers the production of significant documents, such as a permanent resident card (green card) or employment authorization document. These documents give individuals evidence of their status and permission to reside and work in the United States.
6. **Fraud Detection and National Security:** Throughout the application process, the ISO may refer a benefit request to USCIS fraud detection and national security staff due to fraud concerns.⁵

Prior OIG Work

OIG previously reported on data integrity issues related to CLAIMS3. Specifically:

- In 2005, we identified a persistent problem when USCIS locations transferred information from their local CLAIMS3 data repositories to the centralized CLAIMS3 mainframe.⁶ Often, the information did not upload properly and errors occurred during the transmissions. OIG made six recommendations to improve USCIS' processes and systems.

⁵ This referral occurs if the ISO finds suspicious material in the request or as the result of criminal background checks that require analysis and disposition by USCIS personnel specifically trained in the areas of national security and fraud.

⁶ *USCIS Faces Challenges in Modernizing Information Technology*, OIG-05-41, September 2005



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- In 2010, we reported on USCIS' efforts to detect and deter internal fraud committed by ISOs. USCIS concurred and subsequently implemented all of our recommendations to improve USCIS' efforts to counter employee misconduct.⁷
- In recent audits of DHS consolidated financial statements and internal control over financial reporting, we identified inaccurate and unsupported data in CLAIMS3 and other adjudication systems.⁸ For example, there were inaccuracies or unsupported data related to the status of applications, fee amounts, and the number of pending applications.

Results of Audit

USCIS has not implemented an effective process to track adjudicative decisions and ensure data integrity in its CLAIMS3. Federal standards and DHS requirements stress the importance of internal controls over both data reliability and system access to achieve effective and efficient operations. However, USCIS cannot reliably trace adjudicative decisions recorded in CLAIMS3 back to the ISO responsible for those decisions. Our analysis of fiscal years 2015–2017 CLAIMS3 data showed that only 66 percent of adjudicative decisions could be tracked. This is due to USCIS' decentralized policy that allows service centers and field offices discretion in deciding which users can enter benefit decisions in the system. Additionally, USCIS did not implement adequate monitoring and system access controls to prevent intrusions and potential fraud. Instead, staff who are not officers have the same user access and privileges as ISOs.

These weaknesses create data integrity issues and vulnerability to fraud. Further, inconsistent data input, along with inadequate system functionality and quality control, render CLAIMS3 unreliable in supporting key management operations. Finally, the system does not support accurate management and productivity reporting necessary for sound management decision making.

Ineffective Use of CLAIMS3 to Track Adjudicative Decisions

Although Federal and DHS standards require establishing and maintaining internal controls and reliable data, USCIS has not implemented an effective process to track adjudicative decisions and ensure the integrity of its data in

⁷ *Efforts to Detect and Deter Fraud Committed by Immigration Services Officers*, OIG-10-118, September 15, 2010

⁸ *United States Citizenship and Immigration Services' Management Letter for DHS' Fiscal Year 2016 Financial Statements Audit*, OIG-17-84, June 27, 2017; *United States Citizenship and Immigration Services' Management Letter for DHS' FY 2015 Financial Statements Audit*, OIG-16-79, May 3, 2016; *U.S. Citizenship and Immigration Services' Management Letter for DHS' FY 2014 Financial Statements Audit*, OIG-15-72, April 21, 2015



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CLAIMS3. Specifically, USCIS cannot reliably trace adjudicative decisions entered into CLAIMS3 to the ISOs responsible for those decisions. This inability to track decisions is a result of USCIS' policy that allows service centers and field offices to establish local procedures for recording adjudicative decisions in the system. Specifically, the policy allows users who are not officers to enter decisions on behalf of ISOs. Further, USCIS allows users who are not officers the same level of system access as its ISOs, resulting in data integrity and access issues. Lack of access controls leaves CLAIMS3 vulnerable to potential unauthorized users recording approval decisions that could trigger production of green cards or employment documents.

Federal Standards and Guidelines for Internal Controls, Data Quality, and Information Systems

Federal guidelines require that management establish and maintain internal controls to achieve effective and efficient operations and to comply with applicable laws and regulations.⁹ The Government Accountability Office's (GAO) *Standards for Internal Controls in the Federal Government* require that agency management design appropriate control activities over information processing to ensure that all transactions are complete and accurately recorded.¹⁰ Further, agencies should design control activities to support the completeness, accuracy, and validity of information processing by information technology. Additionally, data reliability guidelines also require that data be complete, accurate, and consistent.¹¹

Federal standards require that management establish appropriate access controls over information systems. The *Federal Information Security Modernization Act* defines a comprehensive framework to protect government information, operations, and assets against natural or manmade threats.¹² Further, the National Institute of Standards and Technology (NIST) recommends security controls for information systems and organizations and documents security controls for all Federal information systems, except those designed for national security.¹³ By preventing unauthorized use of and changes to the system, data and program integrity are protected from malicious intent (e.g., someone breaking into the technology to commit fraud,

⁹ OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*

¹⁰ *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 10, 2014

¹¹ Completeness refers to the extent to which relevant records are present and populated appropriately. Accuracy refers to the extent to which the data reflect the underlying information. Consistency refers to data being well defined enough to yield similar results in similar analyses (GAO-09-680G, *Assessing the Reliability of Computer-Processed Data Version I*, dated July 2009).

¹² 44 United States Code §§ 3551-3558

¹³ NIST SP 800-53 revision 4, *Security and Privacy Controls for Federal Information Systems and Organizations*



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vandalism, or terrorism) or error. DHS supplements these guidelines by requiring that its components institute system access controls using the principle of least privilege to protect sensitive information from unauthorized access or use.¹⁴

USCIS provides guidance and procedural policy for the Adjudications Program in its *Adjudicator's Field Manual* and *USCIS Policy Manual*. According to the field manual, ISOs must review applications for complete supporting documentation, consider applicable laws and regulations, and factor in background check results and other information to make approval or denial decisions. Further, the field manual directs ISOs to record their adjudicative decisions on paper applications using adjudicative stamps assigned exclusively to each ISO.¹⁵ USCIS does not allow ISOs to give their stamps to anyone else to record benefit decisions on their behalf.

Inadequate Controls over Adjudicative Decisions in CLAIMS3

Although USCIS tracks adjudicative decisions on paper forms, its process for tracking adjudicative decisions in CLAIMS3 is ineffective. Specifically, USCIS cannot reliably trace adjudicative decisions entered into CLAIMS3 back to the ISOs responsible for those decisions.

When an individual enters an adjudicative decision into CLAIMS3, the system automatically records the identity of the individual in the User Identification (User ID) field.¹⁶ We reviewed the User ID field for all approval decisions from FY 2015 through FY 2017. About 9 million approvals were entered by ISOs authorized to make adjudicative decisions, but nearly 5 million approvals were entered by other USCIS staff and could not readily be tracked back to the approving ISO. Table 1 provides a breakdown of application approvals in CLAIMS3 by fiscal year and user category.

¹⁴ DHS 4300A, *Sensitive Systems Handbook* Version 12.0, dated November 2015

¹⁵ USCIS' *Personal Property Management Handbook* contains extensive directives as to how ISOs are to maintain accountability over their stamps. This includes securing the stamps when not under their immediate control and reporting theft or missing stamps to the appropriate authority and/or law enforcement.

¹⁶ A User ID is used to identify a user on a system. To gain access to the system, each individual is assigned a unique user identification. When a decision is entered into CLAIMS3, the system captures the User ID of the person who enters the decision.



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Table 1: Total Approvals in CLAIMS3 by User Category, FY 2015– FY 2017

Fiscal Year	Category	Number of Approval Notices Ordered	Percent of Total Approval Notices Ordered
2015	ISO	2,611,406	45.4
	Non-Officer	323,360	5.6
	Indeterminate	13,372	0.2
	Unknown Title	1,304,676	22.7
	Unknown Name	1,499,268	26.1
	Total	5,752,082	100
2016	ISO	3,848,294	76.5
	Non-Officer	123,999	2.5
	Indeterminate	11,499	0.2
	Unknown Title	831,562	16.6
	Unknown Name	212,759	4.2
	Total	5,028,113	100
2017	ISO	2,610,399	85.5
	Non-Officer	154,011	5.0
	Indeterminate	8,606	0.3
	Unknown Title	262,319	8.6
	Unknown Name	16,890	0.6
	Total	3,052,225	100
Total Fiscal Years 2015–2017	ISO	9,070,099	65.6
	Other		
	Non-Officer	601,370	4.4
	Indeterminate	33,477	0.2
	Unknown Title	2,398,557	17.3
	Unknown Name	1,728,917	12.5
	Other Subtotal	4,762,321	34.4
Total	13,832,420	100	

Source: DHS OIG analysis of USCIS data¹⁷

Of the nearly 14 million approvals recorded in CLAIMS3 from FY 2015 through FY 2017, about 9 million (nearly 66 percent) were recorded by ISOs who had the authority to approve applications. Of the nearly 5 million (over 34 percent) application approvals remaining, we found:

- More than 600,000 approvals (over 4 percent) were recorded in CLAIMS3 with User IDs belonging to staff who were not officers, such as analysts, assistants, clerks, or contractors.

¹⁷ For this analysis, we defined ISOs as CLAIMS3 users with any position title that contained the word “officer,” any executive-level title (such as Branch Chief), and individuals with multiple titles (one of which contained “officer” and one of which did not). We defined “non-officers” as system users with any title containing the words “analyst,” “assistant,” “clerk,” or “contractor.” Indeterminate are those users for whom we could not determine whether they had adjudicative privileges (such as general counsel and information technology specialist).



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- More than 33,000 approvals were associated with User IDs that USCIS identified as information technology specialists, general counsel, or others whom we could not confirm had adjudicative privileges.¹⁸
- More than 2 million approvals (about 17 percent) belonged to User IDs for which USCIS was unable to provide title or position information. In other words, USCIS could not tell from CLAIMS3 data whether individuals recording these approvals were ISOs, support staff, or another category.
- The remaining 1.7 million approvals (over 12 percent) were recorded with User IDs for which USCIS was unable to provide names. CLAIMS3 attributed these approvals to User IDs associated with generic local area network users or service accounts that could not be linked with any specific user.

USCIS has made substantial progress in tracking approval decisions back to ISOs. Specifically, as table 1 shows, the percentage of trackable approvals rose from just over 45 percent in FY 2015 to 85 percent in FY 2017. Nevertheless, 15 percent could not be tracked to ISOs as of the end of FY 2017.

Factors Impacting Ability to Track Adjudicative Decisions

USCIS' inability to track all adjudicative decisions electronically to the corresponding ISOs occurred because USCIS policy does not require that ISOs enter adjudicative decisions into CLAIMS3. Rather, USCIS allows service centers and field offices to decide who may enter the decisions. USCIS also cannot electronically track adjudicative decisions in CLAIMS3 because USCIS allows staff who are not officers to have the same CLAIMS3 user access and privileges as officers.

Decentralized Policy for Entering Application Decisions

USCIS' *Adjudicator Field Manual* requires that ISOs enter their own adjudicative decisions on the paper application. To approve an application, the ISO must stamp the action block of the application form with his or her approval stamp. ISOs cannot delegate this authority to another individual. However, USCIS has not implemented similar controls over entering adjudicative decisions into CLAIMS3. The field manual allows ISOs to update approvals in CLAIMS3 to generate application approval notices or to complete worksheets directing clerical staff to do so.

¹⁸ According to USCIS, ISOs may move to other positions temporarily or permanently, such as to a general counsel position, and retain their adjudicative stamps and privileges.



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According to USCIS officials, three service centers – Vermont, Nebraska, and California – allowed adjudicative support staff to enter adjudicative decisions into CLAIMS3. In 2017, the Vermont Service Center changed its policy to require its ISOs to enter their adjudicative decisions directly into CLAIMS3. However, the Nebraska and California Service Centers continue to allow users who are not officers to enter certain benefit approval decisions into CLAIMS3 on behalf of ISOs. Specifically, the California Service Center allows adjudicative support staff to enter approval decisions into CLAIMS3 for, among other applications, a *Petition for a Nonimmigrant Worker* (Form I-129) and an *Application to Register Permanent Residence or Adjust Status* (Form I-485). Similarly, the Nebraska Service Center generally allows support staff to process approvals for the *Application for Travel Document* (Form I-131) and the *Application for Employment Authorization* (Form I-765). CLAIMS3 records the User ID of the staff member who enters the action into the system. Therefore, when an administrative staff member enters the decision on behalf of the ISO, the ISO responsible for the decision is not recorded.

Our analysis of CLAIMS3 approval data supported USCIS claims that Nebraska, California, and Vermont Service Centers allowed users who are not ISOs to enter adjudicative decisions into CLAIMS3. However, despite USCIS' claims to the contrary, it appeared from our data analysis that administrative staff other than ISOs entered application approvals at other locations as well. Specifically, from FY 2015 through FY 2017, nearly 244,000 application approvals in CLAIMS3 were associated with individuals with the title Immigration Services Assistant:

- 116,381 approvals at the Nebraska Service Center;
- 72,893 approvals at the California Service Center;
- 29,678 approvals at the Vermont Service Center;
- 2,166 approvals at the Texas Service Center; and
- 101 approvals at the Potomac Service Center.

Further, officials at three field offices we visited and senior officials at the USCIS Field Office Directorate said they required ISOs to record their own application decisions in CLAIMS3. However, our analysis showed that from FY 2015 through FY 2017, Immigration Services Assistants assigned to field offices had entered 22,295 approval decisions.

USCIS officials at Nebraska and California Service Centers said they did not require ISOs to enter their adjudicative decisions into CLAIMS3 to increase efficiency. Specifically, officials said having support staff enter decisions allows ISOs more time to focus on adjudicating applications. According to California Service Center officials, this is particularly important for applications that



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contain hundreds of beneficiaries.¹⁹ For these applications, adjudication support staff can verify the accuracy of names, birth dates, length of visa, and other information for each of the beneficiaries before processing the application as approved. To take advantage of volume processing, Nebraska Service Center officials told us its officers adjudicate the paper application and then email approved application receipt numbers to an administrative mailbox. Nebraska's administrative staff consolidate all receipt numbers by form type for the center and batch approve thousands of applications at once. The officials said this process takes seconds to update the system and eliminates errors that can occur from manually entering each record's validity date into CLAIMS3.

California Service Center officials further justified having support staff enter adjudicative decisions in CLAIMS3 because of the time difference between California and USCIS' east coast printing service, which can affect the validity period of a visa. For example, when an ISO records an approval decision in CLAIMS3, it prompts USCIS' east coast Enterprise Print Management System to generate an approval notice to the applicant. According to officials, the approval date in CLAIMS3 should match the date of the approval notice. However, an ISO may record an approval decision in CLAIMS3 one day and then USCIS' printing service may generate the approval notice the following day. For applications with multiple beneficiaries, allowing support staff to record approval decisions for all beneficiaries listed on the application at once ensures the notices can be printed the same day decisions are entered into the system.

Finally, officials told us that some applicants provide a prepaid envelope so that USCIS can notify them promptly of application approval. This is particularly important for applications that are time sensitive, such as applications for agriculture workers. In these instances, USCIS officials told us that support staff, rather than ISOs, are better positioned to print and send notices expeditiously in the prepaid envelopes.

Service center officials emphasized the efficiency of using support staff for CLAIMS3 adjudicative data entry. At the same time, they recognized that requiring ISOs to enter their own decisions increased transparency, facilitated the tracking of decisions to ISOs, and would improve monitoring of ISO performance and the quality of ISO decisions.

¹⁹ Our previous work on H-2 visas identified issues with adjudicating files with multiple named workers. We recommended USCIS limit the number of workers an employer may request on one application. Implementing this recommendation could help address this issue. For more information on the impact of filings with multiple beneficiaries, see *H-2 Petition Fee Structure is Inequitable and Contributes to Processing Errors* (OIG-17-42, March 2017).



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Insufficient Access Controls and Poor System Design

USCIS cannot electronically track adjudicative decisions in CLAIMS3 because the system lacks sufficient access controls. USCIS policies require supervisors to complete and submit a form to the Office of Information Technology requesting system access for users under their supervision. USCIS' *CLAIMS3 LAN System Administration and Operations Manual* requires that USCIS grant users access based on the principle of least privilege to ensure proper separation of duties. However, we found that USCIS did not adequately segregate adjudicative duties in CLAIMS3. Particularly, USCIS does not differentiate between an ISO and an Immigration Services Assistant when granting user access and privilege. As a result, Immigration Services Assistants have the same level of access in CLAIMS3 as ISOs.

USCIS officials informed us that adjudication support staff are aware of their responsibilities and do not make improper adjudicative decisions in CLAIMS3. However, the officials acknowledged that there are no automatic checks in the system to prevent improprieties from occurring. They also do not systematically analyze CLAIMS3 data to identify errors or potentially fraudulent activity. Without sufficient access controls, it is possible that an unethical individual can access CLAIMS3, modify beneficiary names and addresses, enter approval action, and generate an approval notice and other documents allowing someone to work or stay in the United States.

USCIS officials said CLAIMS3' access controls are weak because the system was built when such controls were not a primary concern. They also said USCIS does not track changes in roles and responsibilities of individuals with access to CLAIMS3 because of weak system design. Tracking changes in user access would allow USCIS to know when, for example, a contractor or clerk with CLAIMS3 access applies for and accepts an ISO position requiring access and responsibility to adjudicate applications. Tracking user access history would allow USCIS to analyze data and identify staff who enter adjudication actions based on prior roles and privileges that did not authorize them to do so.

USCIS officials informed us that CLAIMS3 is extremely difficult to change, and modernization efforts have been challenging. GAO and DHS OIG have previously reported on this issue.²⁰ According to a CLAIMS3 program official, USCIS hopes to be able to refine user access and roles as part of the ongoing CLAIMS3 modernization effort, but other cybersecurity issues have taken precedence.

²⁰ *Immigration Benefits System: Significant Risks in USCIS's Efforts to Develop its Adjudication and Case Management System*, GAO-17-486T, March 16, 2017; *Immigration Benefits System: Better Informed Decision Making Needed on Transformation Program*, GAO-15-415, May 18, 2015; *U.S. Citizenship and Immigration Services Information Technology Management Progress and Challenges*, OIG-14-112, July 3, 2014; *USCIS Automation of Immigration Benefits Processing Remains Ineffective*, OIG-16-48, March 9, 2016



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Impact of Decentralized Policy and Lack of Access Controls

Without consistent policy and strong system access controls, USCIS cannot provide assurance that CLAIMS3 data are accurate or complete, or that CLAIMS3 can provide accurate information regarding who is making adjudicative decisions. These data integrity issues can open the organization to potential fraud.

Currently, CLAIMS3 electronically captures the User ID of the person who records the decision in the system. In some instances, this individual is a member of the support staff who does not have the authority to make adjudicative decisions. As a result, USCIS cannot be certain that all benefit decisions entered in CLAIMS3 — subsequently generating approval notices, green cards, and employment authorization documents — have been made by individuals with authority to make such decisions. Without accurate electronic data, tracking specific adjudicative decisions requires time-consuming and extensive effort. Officials must request and review paper files that are often not stored at the service centers or field offices where the application decisions are made. Further, without complete data in its electronic system of record, USCIS may not be able to recreate lost or missing paper files.

To the extent possible, USCIS should make an effort to ensure data integrity in its system of record. According to Federal internal control standards, management should design information systems and related control activities to achieve their objectives and respond to risks.²¹ Information processing controls may include segregation of duties, accurate and timely recording of transactions, and restricted access to and accountability for resources and records.

Without sufficient access controls, USCIS cannot prevent unauthorized staff from accessing CLAIMS3 and entering erroneous or fraudulent information without detection. For example, unauthorized individuals could access CLAIMS3, change the names of beneficiaries, initiate approval notices, and generate employment authorization documents or green cards for those who should not obtain such benefits. Lacking consistent policy and access controls, USCIS cannot prevent internal fraud. Unreliable CLAIMS3 history data also affects USCIS' ability to use the information for management and oversight functions.

²¹ *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014



Additional Factors Affecting Data Reliability Render CLAIMS3 Unreliable to Support Key Management Activities

Federal managers rely on quality information to make informed decisions, evaluate an agency's performance, and address risks. Quality information is appropriate, current, complete, accurate, accessible, and prompt. In addition to the inconsistent data input previously discussed, inadequate system functionality and quality control have rendered CLAIMS3 unreliable in supporting key management operations. For example, USCIS investigative units cannot use CLAIMS3 data to proactively monitor and identify internal fraud. The system also does not support the accurate management and productivity reporting needed for sound management decision making.

System Functionality Issues

A lack of system edit checks, inability to identify adjudicators, and other missing data fields contribute to CLAIMS3 data integrity issues.

Lack of System Edit Checks

USCIS has not fully implemented system edit checks to identify obvious errors in CLAIMS3 adjudicative data.²² In particular, there are no edit checks to ensure the proper sequencing of adjudicative actions. In practice, history action codes electronically capture the actions by USCIS personnel or systems to process and adjudicate applications. Generally, ISOs access the "Adjudicative Portal" in CLAIMS3 and use a drop-down menu to enter a decision action into the system. CLAIMS3 converts the selected decision action to an action code and automatically captures the User ID of the ISO or person who entered the action. Action codes include:

- "AA" Received – USCIS received an application;
- "DA" Approved/Notice Ordered – a benefit has been approved; and
- "IEA" Approval Notice Sent – an applicant has been notified of an approved benefit.

Typically, when an ISO approves a benefit, the ISO's approval decision is coded in the system as "Approved/Notice Ordered." Subsequently, the "Approval Notice Sent" action code shows USCIS has notified the applicant of the decision. According to USCIS officials, proper sequencing of adjudicative decisions is needed to close out a file as complete.

²² Edit checks are automated controls programmed into an application to help prevent entry of invalid or unreasonable data.



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However, our analysis of CLAIMS3 found more than 8,000 instances from FYs 2015 through 2017 in which an “Approval Notice Sent” action code appeared in CLAIMS3 without a corresponding “Approved/Notice Ordered” action code. In these instances, the system appears to show approval notices that were printed and sent to applicants without ISOs having made approval decisions. USCIS informed us the more than 8,000 instances are attributable to a known data migration problem caused by network communication issues. Officials also claimed this issue had been fixed and an internal audit showed that CLAIMS3 data were mostly correct. Further, USCIS officials told us that business rules implemented as part of modernizing CLAIMS3 will prevent an approval notice from being sent without an approval recorded in the system. Despite these existing and planned improvements, USCIS could not easily use CLAIMS3 to provide assurance that in these instances, ISOs had approved the benefits before notices were sent to applicants. To do so would require that USCIS engage in a time-consuming process of pulling and reviewing the paper files associated with the anomalies. Implementing automated system edit checks would help USCIS ensure the proper sequence of events, improve data accuracy, provide sufficient management reporting, and facilitate fraud monitoring.

No Data Field to Identify the Adjudicator

USCIS lacks the tools to verify the ISO’s identity and authority to adjudicate. Specifically, USCIS does not maintain a complete User ID file containing all names, titles, and roles of CLAIMS3 users.

USCIS’ User ID file does not capture all information necessary to identify individuals with access to CLAIMS3 and their authority. Without readily available user names, titles, and roles, USCIS had to undertake an enormous, time-consuming effort to provide us with the data we requested on CLAIMS3 users. Specifically, it took more than a month and multiple deliverables to give us the names of all individuals who entered information into CLAIMS3. Additionally, the CLAIMS3 program manager initially could not give us the titles of users with access to CLAIMS3 because this information is not in the user files. Eventually, after coordinating with its five service centers, Human Resources, and other divisions, as well as matching CLAIMS3 data against numerous other systems, USCIS gave us a CLAIMS3 user file that represented its best effort. Even then, some titles of current CLAIMS3 users were missing. Further, none of the systems from which USCIS extracted name and title data maintains a record of changes to users’ titles, permissions, and roles.

USCIS also cannot link ISOs’ user identities in CLAIMS3 with serial-numbered stamps used to enter decisions in paper files. Without such a link, USCIS lacks the information needed to compare paper and electronic records to confirm data accuracy and completeness. Further, USCIS cannot confirm ISOs’ identities in CLAIMS3 because the system does not contain a data field to



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capture an ISO's identity when a user who is not an ISO enters a decision on the ISO's behalf. Not knowing the identity of the decision maker renders USCIS' system of record incomplete and inaccurate, and limits internal fraud monitoring and productivity reporting.

Other Missing Data Fields

CLAIMS3 is missing important data fields that prevent USCIS from proactive analysis to detect suspicious activity and identify trends and anomalies.²³ For example, USCIS officials told us that capturing the email addresses of attorneys and representatives in CLAIMS3 would help them identify potential fraud schemes.

USCIS officials also identified other missing or suggested data fields that would improve customer service and facilitate proactive fraud monitoring. Multiple USCIS officials suggested that CLAIMS3 capture applicants' medical information, such as the doctor's name, address, and the validity period of the examination. Such information could improve customer service and maximize USCIS' resources. For example, USCIS could notify applicants about out-of-date medical exams so applicants could update them before their USCIS interview. This information could also help USCIS detect and combat fraud. According to USCIS fraud officials, fraud schemes in which individuals claimed to have been examined by doctors thousands of miles away are pervasive. Additionally, USCIS officials told us that information input into CLAIMS3 fields drops out and is not viewable or searchable to USCIS personnel. This limits the ability to identify, review, and analyze information pertaining to possible fraud concerns and hinders the ability to identify fraud trends or anomalies in supporting evidence pertaining to an application.

According to GAO's *Standards for Internal Control in the Federal Government*, to minimize the risk that fraud will occur agencies should implement controls to prevent, detect, and respond to fraud risks. Because it has not implemented such controls and does not systematically analyze CLAIMS3 data for potential fraud, USCIS may not know about fraud or respond appropriately.

Inadequate Quality Control

According to GAO's *Framework for Managing Fraud Risk in Federal Programs*, fraud poses a significant risk to the integrity of Federal programs and erodes public trust in Government.²⁴ Therefore, agencies should establish controls that collect and analyze quality information to detect potential fraud and monitor fraud trends. USCIS' data quality efforts have not been adequate. Prior to 2015, USCIS' Office of Performance and Quality administered a national

²³ Proactive analysis identifies potential misuse or fraud before it is reported.

²⁴ *A Framework for Managing Fraud Risks in Federal Programs*, GAO-15-593SP, July 2015



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quality review program to ensure the quality of adjudicative processes. USCIS discontinued this national program in 2015, leaving the service centers and field offices to continue in the absence of headquarters-level guidance and oversight. Due to staff changes, USCIS could not provide us the rationale for discontinuing the national program.

USCIS service centers and field offices also have not adequately addressed CLAIMS3 data quality. Every quarter, USCIS service centers and field offices review a sample of case files using a checklist designed to identify potential errors made during the adjudicative process. USCIS selects its sample to obtain a 95 percent confidence level and a 5 percent margin of error. Among other steps, USCIS' quality assurance checklists require quality assurance personnel to verify that the decision in the electronic record matches the decision in the paper-based file. Although USCIS' quality assurance reviews would identify this information, they may not identify other discrepancies in CLAIMS3. For example, USCIS' quality review checklist does not include a procedure to compare the identity of the individual who entered the adjudicative decision into CLAIMS3 with the identity of the ISO who stamped the paper application. In addition, the quality assurance process does not include steps to ensure that the "Approved/Notice Ordered" precedes an "Approval Notice Sent."

Including the additional steps noted previously in USCIS' quality assurance reviews would help ensure the quality of CLAIMS3 data for internal fraud monitoring and reporting purposes. During our fieldwork, an official said the additional check of ISOs' identities would benefit quality assurance by adding an additional layer of integrity to the data. As discussed, if the paper application is lost or missing, USCIS has no way to determine who adjudicated the application.

Limited Internal Fraud Monitoring

Quality information is appropriate, current, complete, accurate, accessible, and prompt; and agencies should establish controls that collect and analyze quality information to detect fraud and monitor fraud trends. Agencies should also use this information to continuously improve their fraud prevention, detection, and response. Figure 2 identifies fraud control activities.



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Figure 2: Interdependent and Mutually Reinforcing Categories of Fraud Control Activities



Source: A Framework for Managing Fraud Risks in Federal Programs, GAO-15-593P, July 2015

As shown in figure 2, critical control activities for managing fraud risk fall into three interdependent and mutually reinforcing categories — prevention, detection, and response. For instance, detection activities, such as analyzing data to identify misconduct or potential internal fraud, also discourage fraudulent behavior by creating the perception of controls and possible punishment. Responses to fraud can inform preventive activities, such as using results of investigations to enhance applicant screenings and fraud indicators. Further, predictive analytic techniques for proactive fraud monitoring can increase the effectiveness of antifraud programs by identifying particular types of behavior, including potentially fraudulent behavior.

Unreliable data prevent USCIS from undertaking proactive data analytics to determine, for example, whether certain decisions, such as approvals recorded by staff other than an ISO, were made by individuals with authority to do so, were made in error, or were the result of fraud. Although USCIS established a unit to monitor for internal fraud, this unit does not use CLAIMS3 to systematically monitor employees for potential misconduct or internal fraud.

Specifically, in 2013, USCIS provided data analytics capabilities to a new Enterprise Risk Management Branch within OSI to perform systematic risk and fraud analysis. The branch planned to use CLAIMS3 and other case management systems as the primary sources of data to analyze insider threats. Almost immediately, OSI undertook two data analytics projects that yielded statistically significant findings. The first project identified relationships in the data that pointed to potential fraud. For instance, OSI identified unusual patterns in the approval rates of applicants based on their biographic information (i.e., ethnicity and gender). OSI attributed the success of this first project to data from a field office where ISOs are required to record their own adjudicative decisions in the system. In the second project, OSI identified a contractor who committed fraud by altering naturalization data.



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Despite these successes, OSI officials cited a number of challenges that prevented them from undertaking additional data analytics projects or systematically monitoring to proactively identify fraud. In particular, OSI officials said they had difficulty getting data from USCIS to conduct fraud analysis. OSI officials also told us the data they obtained contained non-standard data fields, particularly address fields, which limited their data analysis. In addition, the inability to determine the identities of ISOs who made adjudicative decisions when users who are not officers entered decisions in CLAIMS3 hindered proactive internal fraud monitoring.

Our analysis of CLAIMS3 data supported these OSI officials' observations. For example, over a 7-day period in 2017, a single User ID was associated with more than 5,500 approval decisions, with 3,885 approvals made in 1 day. According to service center officials, the User ID belonged to one adjudicative support staff member who was responsible for updating CLAIMS3 decisions on behalf of several ISOs. However, CLAIMS3 only captured the User ID of the support staff member who processed the approvals in the system, not the User IDs of the adjudicators who made the benefit decisions. As mentioned, the lack of a data field to capture an ISO's User IDs creates discrepancies between information on benefit applications and information recorded in the system.

Without reliable data to use in analyses and monitoring, USCIS cannot identify trends and anomalies, and detect fraud when it occurs. For example:

- USCIS cannot use the data to detect anomalies, such as an ISO making too many decisions in a day, or spikes in the number of decisions attributed to a specific ISO.
- USCIS cannot identify patterns indicating an ISO is favoring or discriminating against one demographic group compared to other ISOs, or compared to their own approval record.
- USCIS cannot rely on data to give investigators leads for potential internal or external fraud, such as potential collusion between an ISO and a particular attorney or applicant representative.²⁵

Limited Management Reporting

GAO's standards and frameworks require that management rely on quality information to make informed decisions, evaluate its performance, and address risks. However, CLAIMS3 data issues hamper USCIS' productivity and ISO workload reporting. USCIS generates productivity and workload reports to monitor performance, predict production, and estimate potential intake of

²⁵ Foreign nationals may hire an attorney or representative to submit the application on their behalf and represent them throughout the process.



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processing fees for budgetary purposes. According to the Office of Performance and Quality, USCIS generally creates reports at the service center or headquarters level, rather than the ISO level. For example, each quarter USCIS reports the number of each application type received and whether the application was approved or is still pending adjudication.

Although these reports provide some management information, USCIS cannot compare workloads or track consistency of adjudicative decisions across service centers without issuing complex and time-intensive data calls. For example, managers at all service centers informed us they had to supplement CLAIMS3 with data from secondary systems they developed locally to track productivity. At several service centers, adjudicators reported the time they spent adjudicating each application on a local system because CLAIMS3 lacks a field to capture this information. If management expressed interest in knowing adjudication productivity across service centers, each service center would have to report this information. Officials said, however, that even though secondary systems provide some tracking information, the data are self-reported. Some adjudicators may track their time throughout the day, while others wait until the end of the day or week to record adjudicated petitions. Because this information is not internally audited, the service centers cannot vouch for its accuracy.

Recommendations

We recommend the USCIS Director:

Recommendation 1: Require that only USCIS personnel responsible for adjudicating immigration benefits enter benefit decisions into CLAIMS3 or implement compensating controls that would allow tracking adjudicative decisions in CLAIMS3 back to the ISO who made the decision.

Recommendation 2: Implement standard policies regarding the entering of benefit decisions into CLAIMS3 across all service centers and field offices to improve consistency and internal control.

Recommendation 3: Improve data quality and enhance reporting and fraud monitoring capabilities by creating a data field in CLAIMS3 history to capture the identity of the officer responsible for adjudicating the benefit.

Recommendation 4: Improve quality assurance measures by including procedural steps to compare the identities of the adjudicators who enter benefit decisions in the physical file with the identity of those entering the decisions into the system of record.



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Recommendation 5: Institute a method that clearly defines CLAIMS3 user roles and privileges to limit staff who may enter adjudicative decisions into CLAIMS3 to reduce the risk of potential fraud or abuse.

Recommendation 6: Institute a method to capture the name and title of active and deactivated CLAIMS3 users as well as a historical record of their system access and privileges to improve accountability and enhance USCIS' ability to combat internal fraud.

Recommendation 7: Develop a plan to address the lack of system checks and missing data fields identified in this report to improve the quality of data in USCIS systems and enhance USCIS' quality assurance, fraud monitoring, and reporting processes.

Recommendation 8: Develop a plan to conduct ongoing analysis of CLAIMS3 data to improve oversight and proactive internal fraud monitoring.

OIG Analysis of USCIS Comments

We obtained written comments on a draft of this report from the Director of USCIS. We included a copy of the comments in their entirety in appendix B.

In general, the Director emphasized USCIS' efforts to modernize the legacy CLAIMS3 system, including moving to a web-based platform, addressing security vulnerabilities, and improving business processes. Further, the Director stated that USCIS was in the beginning phases of transitioning to an electronic processing environment, known as eProcessing, for applications, petitions, and requests. The Director stated that this new environment would include more compensating controls than the paper-based environment.

The Director concurred with all eight of our recommendations and provided details on actions USCIS was taking to address the specific findings and recommendations in our report. We reviewed the Director's comments, as well as technical comments previously submitted under separate cover, and made changes to the report as appropriate. The following is our evaluation of the Director's responses to each of our eight recommendations.

Recommendation 1: Require that only USCIS personnel responsible for adjudicating immigration benefits enter benefit decisions into CLAIMS3 or implement compensating controls that would allow tracking adjudicative decisions in CLAIMS3 back to the ISO who made the decision.

Management Comments

The Director concurred with recommendation 1. He indicated that USCIS already has compensating controls to track adjudicative decisions in CLAIMS3



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back to the ISOs who made those decisions. According to the Director, a separate system called RAILS²⁶ provides USCIS with the ability to identify which ISO was in possession of a particular case file at the time a decision on that file was made. The Director further stated that the physical file may be reviewed for accuracy, or used to de-conflict any issues. Although the Director recognized that the current compensating controls to match an ISO with an adjudicative decision can be cumbersome, he believed this capability existed in CLAIMS3. USCIS also informed us that with the implementation of eProcessing for CLAIMS3, ISOs would be interacting with electronic data and recording adjudicative decisions directly within the CLAIMS3 system, rather than stamping and recording decisions in the paper files. According to USCIS, this would eliminate the need for support staff to update cases in CLAIMS3. Therefore, the Director requested that OIG consider this recommendation resolved and closed as implemented.

OIG Analysis

USCIS' response falls short of satisfying the intent of recommendation 1, which is for USCIS to implement a system to track the population of adjudicative decisions, as a whole, back to the ISOs in a systematic and reliable manner, rather than on a case-by-case basis. During our audit work, the service centers and field offices we visited did not indicate that they possess the capability to track decisions systematically. As we discussed in our report, without an efficient and effective electronic tracking process, USCIS would have difficulties conducting appropriate oversight and fraud monitoring of immigration decisions.

Further, comparing CLAIMS3 data with the file location in RAILS as an indicator of the adjudicator's decisions requires that USCIS make a number of assumptions about the physical files. First, USCIS has to infer ISOs scanned files in and out of RAILS as required, and that the files remained with the ISO throughout the entire time they were under adjudication. Further, in the case where applications contained multiple beneficiaries, USCIS had to infer that USCIS administrative staff did not make data entry errors when recording the decisions of the officer with respect to each of the many beneficiaries. Finally, USCIS had not implemented system controls in CLAIMS3 to prevent users from entering adjudicative decisions without having possession of the physical files. Consequently, having possession of the file in RAILS does not provide conclusive evidence that the same ISO made the adjudicative decision.

Although we look forward to learning more about the implementation of eProcessing for CLAIMS3, this capability was not in operation during our audit. Rather, USCIS was only in the beginning phase of transitioning to this

²⁶ RAILS (not an acronym) is a file tracking system used at USCIS to track location information on each physical file throughout the adjudication process.



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electronic processing environment. Because USCIS does not have an expected completion date for when an adjudicator will be entering decisions directly into CLAIMS3 for all application forms, or a systematic and reliable method of electronically tracking each adjudicative decision to the responsible ISO, recommendation 1 remains open and unresolved.

Recommendation 2: Implement standard policies regarding the entering of benefit decisions into CLAIMS3 across all service centers and field offices to improve consistency and internal control.

Management Comments

The Director concurred with recommendation 2, indicating that USCIS already provided guidance and procedural policy to adjudicators through the *Adjudicator's Field Manual*, the *USCIS Policy Manual*, and the *Consolidated Handbook of Adjudication Procedures*. According to USCIS, these documents ensured standard procedures, while recognizing the need for some flexibility at the field office level regarding certain actions. The Director requested that OIG consider this recommendation resolved and closed as these standard policies were already in place.

OIG Analysis

USCIS' existing policies do not satisfy the intent of recommendation 2. We believe that decisions recorded in USCIS' electronic system of record are very important and should be guarded with the same level of care that USCIS gives its adjudicative stamp and benefit decisions on paper. Recording an approval decision in CLAIMS3 is what generates the approval notice and can trigger production of legally significant documents. Therefore, the ISO should be required to record their decision in CLAIMS3. Only in limited circumstances should USCIS allow deviation and those circumstances should be made explicit. Because USCIS did not provide a plan of action and an expected completion date to clarify who can enter adjudicative decision in CLAIMS3, recommendation 2 remains open and unresolved.

Recommendation 3: Improve data quality and enhance reporting and fraud monitoring capabilities by creating a data field in CLAIMS3 history to capture the identity of the officer responsible for adjudicating the benefit.

Management Comments

The Director concurred with recommendation 3. USCIS officials agreed that capturing the identity of the ISO is important but stated that, albeit a cumbersome process, such action can be completed using current systems. Specifically, USCIS officials stated that the CLAIMS3 system displays the action taken on a case, the date and time of the action and the user who performed



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the action. Additionally, the file location data in RAILS shows who was in possession of the file when the action was taken. Any accuracy questions can be addressed by a physical review of the file. Given that the necessary information existed for reporting purposes, the Director requested that OIG consider this recommendation resolved and closed as implemented.

OIG Analysis

USCIS' actions do not meet the intent of recommendation 3. We disagree with USCIS that existing systems and processes for capturing the identity of the adjudicating ISO were sufficient for reporting and fraud monitoring purposes. Specifically, USCIS did not systematically compare adjudicative actions in CLAIMS3 with file locations in RAILS to identify potentially inappropriate or fraudulent activity. Without a data field capturing the ISO's identity, USCIS could not use CLAIMS3 data to detect trends and anomalies that might be indicative of fraud (e.g., an individual ISO making a suspicious number of decisions within a certain period). As indicated by USCIS, without a data field to capture the identity of the ISO, linking an adjudicative decision with the responsible ISO can be a cumbersome and unreliable process. USCIS officials told us secondary systems, such as RAILS, provided some tracking information. However, these officials could not vouch for their accuracy, as these secondary systems contained data that had not been internally audited. As a result, USCIS could only assume that the officer who had physical control of the files before the administrative support staff entered the approval decision(s) into CLAIMS3 had also approved all beneficiaries on paper.

Without accurate and traceable electronic data, tracking specific adjudicative decisions requires time-consuming and extensive effort. Specifically, officials must locate, request, and review a physical file, which may not be stored at the location where the file was adjudicated. Further, if a paper file is lost or missing, USCIS would have difficulties determining who adjudicated the application. Because USCIS did not provide a plan of action for incorporating a data field to capture the identity of the officer responsible for adjudicating a benefit, recommendation 3 remains open and unresolved.

Recommendation 4: Improve quality assurance measures by including procedural steps to compare the identities of the adjudicators who enter benefit decisions in the physical file with the identity of those entering the decisions into the system of record.

Management Comments

The Director concurred with recommendation 4, stating that USCIS' Service Center Operations Directorate and Field Operations Directorate would update local quality assurance procedures and training material to ensure ISO information was consistent between the physical file and CLAIMS3, or some



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combination of data in CLAIMS3 and RAILS. USCIS planned to complete these actions by December 31, 2019.

OIG Analysis

We agree that updating local quality assurance procedures and training materials to ensure ISO information is consistent between the physical file and CLAIMS3 is an effective approach toward addressing this recommendation. This recommendation will remain open and resolved until USCIS provides evidence it has updated quality assurance procedures and training materials to include procedural steps for comparing the identity of the adjudicator who entered benefit decisions in the physical file with the identity of those entering decisions in the system of record.

Recommendation 5: Institute a method that clearly defines CLAIMS3 user roles and privileges to limit staff who may enter adjudicative decisions into CLAIMS3 to reduce the risk of potential fraud or abuse.

Management Comments

The Director concurred with recommendation 5, stating that USCIS' Office of Information Technology would enhance the account request process for CLAIMS3 to better define user roles and system functionality and would update CLAIMS3's user guide and security documentation. USCIS stated it would also continue to review and validate CLAIMS3 user privileges during its annual recertification process. USCIS planned to complete these actions by December 31, 2019.

OIG Analysis

We agree that enhancing the account request process for CLAIMS3 and updating the CLAIMS3 user guide and security documentation are positive steps toward defining user roles and privileges. This recommendation will remain open and resolved until USCIS provides evidence that it has limited staff who record adjudicative decisions and clearly defined CLAIMS3 user roles and privileges.

Recommendation 6: Institute a method to capture the name and title of active and deactivated CLAIMS3 users as well as a historical record of their system access and privileges to improve accountability and enhance USCIS' ability to combat internal fraud.

Management Comments

The Director concurred with recommendation 6, stating that USCIS planned to apply a job title data standard using official position descriptions within



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applicable systems and enhance CLAIMS3 account management processes to comply with this standard. USCIS anticipated these actions would be completed by December 31, 2020.

OIG Analysis

We agree that implementing a strategy to collect and electronically maintain both CLAIMS3 user names and position titles as well as manage CLAIMS3 user access and privileges is a good approach toward addressing the recommendation. This recommendation will remain open and resolved until USCIS provides evidence that it captures the name and title of CLAIMS3 users and maintains a record of historical changes to user access and privileges, including historical data for deactivated accounts.

Recommendation 7: Develop a plan to address the lack of system checks and missing data fields identified in this report to improve the quality of data in USCIS systems and enhance USCIS' quality assurance, fraud monitoring, and reporting processes.

Management Comments

The Director concurred with recommendation 7, stating that USCIS' Service Center Operations Directorate and Field Operations Directorate would update local quality assurance procedures and training materials to support any identified data quality improvement plans. In addition, the USCIS Data Strategy included an objective to implement a Data Quality Program to identify, diagnose, and eliminate issues with USCIS data. USCIS planned to complete these actions by December 31, 2019.

OIG Analysis

We agree that implementing a Data Quality Program to identify, diagnose, and eliminate issues with USCIS data and further updating quality assurance procedures and training material are positive steps toward addressing USCIS' data quality issues. This recommendation will remain open and resolved until USCIS provides evidence that it has developed a plan to address data quality issues identified in this report.

Recommendation 8: Develop a plan to conduct ongoing analysis of CLAIMS3 data to improve oversight and proactive internal fraud monitoring.

Management Comments

The Director concurred with recommendation 8. According to the Director, the USCIS Office of Security and Integrity's Enterprise Risk Management Branch would work with Service Center Operations Directorate and Field Operations



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Directorate product owners as well as other stakeholders to develop a plan for proactive internal fraud monitoring to improve oversight of CLAIMS3 data. USCIS planned to complete these actions by March 31, 2020.

OIG Analysis

We agree that developing and implementing a plan for proactive internal fraud monitoring will improve oversight of CLAIMS3 data. This recommendation will remain open and resolved until USCIS provides evidence that it has developed a plan to conduct ongoing analysis of CLAIMS3 data to improve oversight and proactive internal fraud monitoring.



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Appendix A: Objective, Scope, and Methodology

DHS OIG was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

The objective of our audit was to assess USCIS' process for tracking adjudicative decisions that ISOs make in CLAIMS3. As part of the audit, we explored how USCIS uses automated data to support its quality assurance, fraud monitoring, and reporting processes.

During our audit, we reviewed applicable laws, regulations, and USCIS policies related to the documenting of benefit decisions in the physical file and CLAIMS3. Additionally, we reviewed published GAO and DHS OIG reports relevant to our audit to identify prior findings and recommendations.

We conducted walkthroughs at the California Service Center, Potomac Service Center, Nebraska Service Center, Texas Service Center, Washington Field Office, Santa Ana Field Office, and Dallas Field Office. During these site visits, we interviewed USCIS staff to understand how ISOs document benefit decisions in both the physical and electronic record. In some instances, we observed this documentation process directly. During the site visits, we also interviewed personnel responsible for local quality assurance, fraud monitoring, and reporting processes. In addition to the walkthroughs, we conducted a teleconference with personnel from the Vermont Service Center to gain an understanding of their local policies and procedures.

Additionally, we held meetings and participated in teleconferences with USCIS staff at headquarters to obtain a high-level understanding of the adjudication system, CLAIMS3, fraud monitoring activities, and reporting processes. Specifically, we met with representatives of the Office of Information Technology, Office of Performance and Quality, Office of Security and Integrity, Fraud Detection and National Security Directorate, Field Operations Directorate, and Service Center Operations Directorate.

Finally, we obtained CLAIMS3 history data for FY 2015 – FY 2017, along with a list of active and deactivated CLAIMS3 users. We analyzed CLAIMS3 history data to assess its reliability. We initially assessed CLAIMS3 data and found it sufficiently reliable for the purpose of our audit. For example, we confirmed the number of records matched control totals, fieldnames were representative of the data populated in the field, and duplicate records did not exist. We also included steps in our audit plan to conduct additional tests during audit fieldwork to verify whether the information populated in the CLAIMS3 history file is accurate and reliable. For example, during fieldwork we tested the CLAIMS3 history data for missing approvals and a lack of proper system checks. We also matched the CLAIMS3 history data with a list of users to



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determine the extent to which staff who were not officers entered benefit decisions into the system.

At no point in this audit did we request, obtain, or review classified information.

We conducted this performance audit between January and September 2018 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.



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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)
Washington, DC 20529-2000



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

April 2, 2019

MEMORANDUM FOR: Sondra McCauley
Assistant Inspector General for Audits
Office of Inspector General

FROM: L. Francis Cissna *L. Francis Cissna*
Director
U.S. Citizenship and Immigration Services

SUBJECT: Management Response to OIG Draft Report: "Data Quality
Improvements Needed to Track Adjudicative Decisions"
(Project No. OIG-18-023-ITA-USCIS)

Thank you for the opportunity to review and 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 the efforts the agency has taken to modernize the legacy CLAIMS3, including moving to a web-based platform, addressing security vulnerabilities, and improving business processes. In addition, the report noted that USCIS has made substantial progress in tracking approval decisions back to immigration service officers (ISO) – 85 percent of approval notices were entered by ISOs in fiscal year 2017.

We would also like to note that USCIS is the beginning phases of a transition to processing applications, petitions, and requests, from intake through decision, to an electronic processing environment called e-Processing. e-Processing will create an electronic environment wherein an ISO is interacting with electronic data and recording benefit decisions directly within the CLAIMS3 system rather than stamping and recording decisions in the paper file. This new environment will include more seamless compensating controls than the more cumbersome control processes inherent in a paper-file environment, and will eliminate the need for data entry to be completed by support staff. The draft report contained eight recommendations with which USCIS concurs. Please see the attached for our detailed response to each recommendation.



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Management's Response to OIG Draft Report "Data Quality Improvements Needed to Track Adjudicative Decisions (Project No. OIG-18-023-ITA-USCIS)"
Page 2

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Attachment



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Attachment: Management Response to Recommendations Contained in OIG-18-023-ITA-USCIS, Data Quality Improvements Needed to Track Adjudicative Decisions

OIG recommended that the USCIS Director:

Recommendation 1: Require that only USCIS personnel responsible for adjudicating immigration benefits enter benefit decisions into CLAIMS3 or implement compensating controls that would allow tracking adjudicative decisions in CLAIMS3 back to the ISO who made the decision.

Response: Concur. USCIS has compensating controls to track adjudicative decision in CLAIMS3 back to the Immigration Service Officer (ISO) that made the decision. USCIS has the ability to determine the identity of the adjudicating officer by comparing CLAIMS3 data with file location data from RAILS. For example, the CLAIMS3 history action screen indicates the adjudicative decision made on the case and the date the decision was performed. The file location data in RAILS will show which officer was in possession of the case during the time of action. The physical file may be reviewed for accuracy and to de-conflict any issues.

While the current compensating controls to match an ISO with an adjudicative decision can be a bit cumbersome, the capability currently exists to allow tracking adjudicative decisions in CLAIMS3 back to the ISO who made the decision. Additionally, with the implementation of eProcessing for CLAIMS3, the ISO will be interacting with electronic data and recording adjudicative decisions directly within the CLAIMS3 system rather than stamping and recording decisions in the paper file. This will eliminate the need for support staff to update cases in CLAIMS3. Therefore, USCIS requests that the OIG consider this recommendation to be resolved and closed as implemented.

Estimated Completion Date (ECD): Completed

Recommendation 2: Implement standard policies regarding the entering of benefit decisions into CLAIMS3 across all service centers and field offices to improve consistency and internal control.

Response: Concur. USCIS currently provides guidance and procedural policy to adjudicators through the Adjudicator's Field Manual, the USCIS Policy Manual, and the Consolidate Handbook of Adjudication Procedure. These documents ensure standard procedures, while recognizing the need for some flexibility at the field office level regarding certain actions. Because these standard policies are already in place, USCIS requests that the OIG consider this recommendation to be resolved and closed as implemented.



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ECD: Completed

Recommendation 3: Improve data quality and enhance reporting and fraud monitoring capabilities by creating a data field in CLAIMS3 history to capture the identity of the officer responsible for adjudicating the benefit.

Response: Concur. USCIS agrees that capturing the identity of the ISO is important, and such actions can be completed using current systems, albeit a cumbersome process. Within the CLAIMS3 history action screen, the system displays the action taken on a case, the date and time of the action and the user who performed the action. The file location data in RAILS shows who was in possession of the file when the action was taken. Any accuracy questions can be addressed by a physical review of the file. Given that the necessary information exists for reporting purposes, USCIS requests that the OIG consider this recommendation to be resolved and closed as implemented.

ECD: Completed

Recommendation 4: Improve quality assurance measures by including procedural steps to compare the identities of the adjudicators who enter benefit decisions in the physical file with the identity of those entering the decisions into the system of record.

Response: Concur. The Service Center Operations (SCOPS) and the Field Operations Directorates (FOD) will update local quality assurance procedures and training materials to ensure ISO information is consistent between the physical file and CLAIMS3 or between the data combination between CLAIMS3 and RAILS.

ECD: December 31, 2019

Recommendation 5: Institute a method that clearly defines CLAIMS3 user roles and privileges to limit staff who may enter adjudicative decisions into CLAIMS3 to reduce the risk of potential fraud or abuse.

Response: Concur. The USCIS Office of Information Technology will enhance the account request process for CLAIMS3 to better define user roles and system functionality and will update CLAIMS3's user guide and security documentation. Further, USCIS will continue its existing annual recertification process to ensure that CLAIMS3 user privileges are reviewed and validated annually.

ECD: December 31, 2019

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Recommendation 6: Institute a method to capture the name and title of active and deactivated CLAIMS3 users as well as a historical record of their system access and privileges to improve accountability and enhance USCIS' ability to combat internal fraud.

Response: Concur. USCIS will apply a job title data standard derived from official position descriptions for use within applicable systems and enhance CLAIMS3 account management process to comply with the standard.

ECD: December 31, 2020

Recommendation 7: Develop a plan to address the lack of system checks and missing data fields identified in this report to improve the quality of data in USCIS systems and enhance USCIS' quality assurance, fraud monitoring, and reporting processes.

Response: Concur. SCOPS and FOD will update local quality assurance procedures and training materials in support of any identified data quality improvement plans. In addition, the USCIS Data Strategy includes an objective to implement a Data Quality Program to identify, diagnose, and eliminate issues with USCIS data.

ECD: December 31, 2019

Recommendation 8: Develop a plan to conduct ongoing analysis of CLAIMS3 data to improve oversight and proactive internal fraud monitoring.

Response: Concur. USCIS' Office of Security and Integrity's Enterprise Risk Management Branch (ERMB) will work with SCOPS and FOD product owners as well as other stakeholders, to develop a plan for proactive internal fraud monitoring and improve oversight of CLAIMS3 data.

ECD: March 31, 2020

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Appendix C: Major Contributors to This Report

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