OFFICE OF INSPECTOR GENERAL

Management Alert - U.S. Citizenship and Immigration Services' Use of the Electronic Immigration System for Naturalization Benefits Processing

Homeland Security

January 19, 2017

MEMORANDUM FOR: The Honorable León Rodriquez
                   Director
                   U.S. Citizenship and Immigration Services

FROM: John Roth   *John Roth*
                   Inspector General

SUBJECT: *Management Alert – U.S. Citizenship and
                   Immigration Services' Use of the Electronic
                   Immigration System for Naturalization Benefits
                   Processing*

We are recommending that USCIS halt plans to revert to using the
Electronic Immigration System (ELIS) to process immigrant
naturalization applications until it successfully addresses identified
system deficiencies. In March 2016, we previously reported system
functionality and performance problems prevalent in two product lines
operational in ELIS at that time.[1] Our subsequent, ongoing review is now
discovering alarming security concerns regarding inadequate applicant
background checks, as well as significant USCIS problems in using ELIS
to process naturalization benefits for immigrants. Because of the
problems encountered, USCIS decided in August 2016 to revert to legacy
processing and discontinue using ELIS to process new naturalization
applications. We have been informed that USCIS is now considering a
return to processing naturalization applications in ELIS. Because of
significant unresolved functional and technical issues surrounding ELIS,
we advise against it until corrective actions are taken to ensure security
and integrity in naturalization benefits processing.

Background

Our prior audits disclosed a pattern of problems with ELIS performance
and functionality that have yet been addressed. Specifically, our March
2016 report, *USCIS Automation of Immigration Benefits Processing
Remains Ineffective*, OIG-16-48, identified numerous deficiencies in
system capabilities that users need for immigration benefits and service
processing. The report also highlighted significant performance problems,

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[1] The USCIS Immigrant Fee and the Application to replace a Permanent Resident Card (Form I-90)
were processed in ELIS at the time of our 2016 audit.

including frequent system outages and problems with system interfaces that negatively affected productivity. Further, our November 2016 report, *Better Safeguards Are Needed in USCIS Green Card Issuance*, OIG-17-11, indicated that nearly 20,000 Green Cards had been issued in error, primarily due to ELIS technical and functional deficiencies. USCIS concurred with all 11 recommendations. To date, all of the recommendations are resolved, but remain open pending completion of USCIS' planned actions to address them.

Given USCIS' slow progress in taking corrective actions to address system deficiencies, in December 2016 we began an assessment of USCIS' current efforts to automate processing of the N-400 Application for Naturalization in ELIS. To date, we have reviewed voluminous ELIS documentation and conducted approximately two dozen interviews with USCIS headquarters and field operations personnel. We also visited USCIS' National Benefits Center in Kansas City, Missouri, where we observed ELIS demonstrations and met with system users. Although we are only in the beginning phases of our review, we have already identified significant operational and security issues that pose grave concern and merit your attention and corrective action. We plan to complete our review and provide a comprehensive report with recommendations for improvement later in spring 2017.

Preliminary Concerns about ELIS Processing of Naturalization Benefits

Since its deployment on April 13, 2016, ELIS has impaired the ability of USCIS Immigration Services Officers and field personnel to conduct naturalization processing. Through our preliminary work, we have identified a range of ELIS technical and functional issues that have slowed processing and productivity.

- Missing core ELIS functionality
- Naturalization cases stuck in ELIS workflows, requiring manual intervention for case progression
- Frequent ELIS and network outages
- ELIS failure to connect with supporting systems
- Multiple or erroneous cancellation of applicant interviews

Ongoing USCIS efforts to correct technical deficiencies while concurrently continuing to develop system functionality have resulted in ELIS down time, instability, and repeated changes that interrupt

processing and confuse system users. Moreover, the USCIS Field Operations Directorate identified the following four top challenges in working in ELIS that field users believe must be addressed to ensure effective naturalization processing. We agree, based on our initial field work.

1. <u>Deficiencies in Background and Security Checks for Applicants</u>: USCIS personnel are required to check applicants' biographic data against U.S. Customs and Border Protection's TECS system and the Federal Bureau of Investigation's name check database. However, ELIS allows cases to be moved forward for processing despite incomplete or inaccurate background and security checks. According to Field Operations Directorate officials, approximately 175 applicants were granted citizenship as of January 11, 2017 before the problem was detected and USCIS began redoing the name checks to ensure they were all completed correctly. Without sufficient vetting, immigrants could potentially be granted U.S. citizenship although they are ineligible or pose national security threats.

2. <u>Inconsistent Case Management Update and Closeout</u>: ELIS does not consistently update the USCIS Central Index System with final immigrant status once an individual is naturalized. The Central Index System contains official records and decisions on all individuals who apply for benefits. The system must accurately reflect final benefits decisions in order to officially close out cases, record applicant status, and inform DHS components such as U.S. Customs and Border Patrol and U.S. Immigration and Customs Enforcement.

3. <u>Printing problems</u>: USCIS field officers cannot print naturalization certificates directly through ELIS, requiring time consuming workarounds to configure individual workstations to print through alternate systems. More importantly, printed certificates sometimes included incorrect names or lacked mandatory data such as photos or country of origin, rendering them invalid. Both issues have created backlogs in benefits delivery.

4. <u>Lack of Contingency Planning for Sustained Processing</u>: USCIS field officers are unable to obtain electronic copies of applicant files and supporting evidence during frequent ELIS or network outages.

A lack of contingency planning to ensure continuity of operations during outages hinders the field officers' ability to conduct interviews and issue timely benefits approvals to applicants.

Given such technical and functional issues, the USCIS Director decided in August 2016 to discontinue use of ELIS and revert to using the legacy Computer Linked Application Information Management System for all new N-400 applications received after that date. USCIS field offices and the National Benefits Center also had to finish processing the nearly 250,000 cases that had been started in ELIS but not yet completed. To date, less than 10 percent of those ELIS cases have been completed and closed out.

Recently, we learned of an impending decision by USCIS leadership to return to ELIS processing in late January 2017. We are concerned about the feasibility and risk of such a decision given all the ELIS problems that remain unresolved. Earlier this month, the USCIS Field Operations Directorate expressed similar concerns, emphasizing to the USCIS Chief Information Officer that the four top challenges that his directorate identified, described above, are minimal requirements that must be met before a return to processing naturalization benefits in ELIS. As such, we recommend that USCIS:

1. Ensure the four minimal requirements of the Field Operations Directorate are met prior to returning to ELIS processing of N-400 naturalization applications.

2. Perform a risk-based analysis of all unresolved ELIS technical issues to ensure that, going forward, all system improvement decisions are based on potential agency operational impact and risk to public safety.

I appreciate your attention to resolving this matter. Please call me with any questions, or your staff may contact Sondra F. McCauley, Assistant Inspector General for Information Technology Audits, at (202) 254-4041.

ADDITIONAL INFORMATION AND COPIES

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