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January 10, 2018

The Honorable L. Francis Cissna
Director
United States Citizenship and Immigration Services
U.S. Department of Homeland Security
Washington, D.C. 20529

Dear Director Cissna,

In November 2017, the Department of Homeland Security's (DHS) Office of Inspector General (OIG) released a report stating that the United States Citizenship and Immigration Services' (USCIS) attempt to automate applications for naturalization has been "unsuccessful" due to "poor program management practices."[1] It is outrageous that despite a combined total of 12 audits and 68 recommendations for improvement from OIG and the Government Accountability Office (GAO), USCIS' Electronic Immigration System (ELIS) has not achieved its goals of increasing efficiencies, improving customer service, and enhancing national security. In fact, ELIS did the exact opposite by erroneously granting citizenship to more than 200 individuals without proper background checks, and in turn, increased national security risks.

OIG identified five program management deficiencies that have had a negative impact on ELIS, including: a schedule-driven approach, lack of user guidance and support, inadequate opportunity for stakeholder engagement, inability to measure ELIS impact, and insufficient testing. However, these challenges should come as no surprise to USCIS as a majority of them were identified in previous OIG reports.[2] Known challenges that continue to go uncorrected raise the question of USCIS' ability to successfully complete complex initiatives, such as ELIS. Moreover, poor program management does not occur in a vacuum, and may cast doubt on USICS' capacity to accomplish future transformations.

As discussed in the Subcommittee on Oversight and Management Efficiency's March 13, 2017, hearing titled, "Immigration Benefits Vetting: Examining Critical Weaknesses in USCIS

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[1] OIG, *USCIS Has Been Unsuccessful in Automating Naturalization Benefits Delivery,* OIG-18-23 (Washington, D.C. November 30, 2017).
[2] OIG, *USCIS Has Been Unsuccessful in Automating Naturalization Benefits Delivery,* OIG-18-23 (Washington, D.C. November 30, 2017). Appendix C.
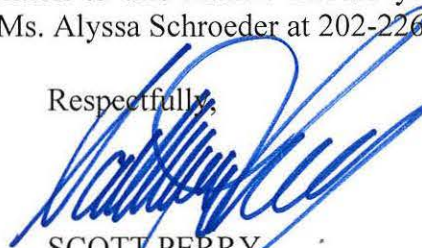
Systems," it is critical that our nation have an immigration processing system that operates securely and accurately, is managed well, and adheres to a budget in order to protect American citizens and our homeland.

Please provide the requested information to the Committee no later than February 9, 2018, pursuant to Rule X(3)(g) and Rule XI of the Rule of the House of Representatives:

1. USCIS is performing background checks through both ELIS and an external legacy system.
   a. Does USCIS intend for background checks to be run through both systems permanently, or just until USCIS has mitigated problems within ELIS?
   b. When does USCIS estimate that the background check deficiencies within ELIS will be solved?
2. Has USCIS completed developing an advanced ELIS N-400 training curriculum?
   a. If so, is the new training curriculum currently available for all ELIS operators?
   b. Will USCIS conduct some form of user feedback to assess the effectiveness of the training?
   c. If not, when will it be completed, and what is the reason for the delay beyond USCIS' stated completion date of December 31, 2017?
3. How long will 70% of team capacity be focused on addressing existing technical debt, and what does USCIS determine to be an acceptable amount of technical debt?
4. Please identify the eight new business objectives for measuring the operational impacts of ELIS.
5. USCIS has 27 open or resolved/open recommendations from OIG and GAO related to the Transformation Program or ELIS. Does USCIS plan on closing all these recommendations?
   a. If so, please provide a timeline.
   b. If not, please provide the rationale.
6. USCIS must complete 12 additional actions required by the DHS Acquisition Review Board before moving out of a breach status. What is the completion timeline for each of the 12 actions?

Thank you for your prompt attention to this matter. Should you have any additional questions, please have your staff contact Ms. Alyssa Schroeder at 202-226-8417.

Respectfully,

SCOTT PERRY
Chairman
Subcommittee on Oversight and
Management Efficiency

U.S. Citizenship
and Immigration
Services

March 2, 2018

The Honorable Scott Perry
Chairman
Subcommittee on Oversight
   and Management Efficiency
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Perry:

Thank you for your January 10, 2018 letter regarding the Department of Homeland Security's Office of Inspector General report titled, *"USICS Has Been Unsuccessful in Automating Naturalization Benefits Delivery,"* OIG-18-23.

Enclosed are responses to your questions regarding U.S. Citizenship and Immigration Services' (USCIS) Electronic Immigration System (ELIS).

Thank you again for your letter and your interest in this important matter. If you or members of your staff would like a briefing on Transformation or USCIS ELIS, please have your staff contact the USCIS Office of Legislative Affairs at (202) 272-1940.

Respectfully,

L. Francis Cissna
Director

Enclosure

**U.S. Citizenship and Immigration Services' Response to
Chairman Scott Perry's January 10, 2018 Letter**

1. **USCIS is performing background checks through both ELIS and an external legacy system.**

   a. **Does USCIS intend for background checks to be run through both systems permanently, or just until USCIS has mitigated problems within ELIS?**

   U.S. Citizenship and Immigration Services (USCIS) has resolved all USCIS Electronic Immigration System (ELIS) issues involving background checks and is confident that USCIS ELIS (also referred to as ELIS) provides complete, accurate, and timely background vetting information. Previously, the Validation of ELIS Risk and Fraud Information (VERIFI) tool was used to compare the results of background checks run through USCIS ATLAS and Person-Centric Query System (PCQS) against results directly from Customs and Border Protection (CBP) databases. The VERIFI comparison tool validates the names originating in USCIS ELIS and highlights any discrepancies or potential mismatches in background check results. Starting in April 2017, USCIS had completed 232 separate validations using the VERIFI tool. In every instance, ELIS properly performed the required security checks and properly displayed the result in the USCIS ELIS user interface. Because we resolved these background check errors, associated issues, as well as implemented significant improvements and enhancements to the system, USCIS returned to ELIS for ingestion and processing of Applications for Naturalization (N-400 applications) in October 2017. Since returning to ELIS, USCIS no longer utilizes the VERIFI tool to compare the results of all background checks and ensure accuracy. However, the VERIFI process remains an available quality assurance measure that is utilized for random sample testing and validation.

   Note: ATLAS is a service that identifies potentially derogatory information by matching applicant information to interagency holdings and screening against law enforcement and intelligence databases.

   b. **When does USCIS estimate that the background check deficiencies within ELIS will be solved?**

   USCIS has resolved all ELIS issues involving the handling of Just-in-Time (JIT) background checks and has made significant enhancements that incorporate a repetitive verification process that allows USCIS ELIS to receive new derogatory encounters as they occur, while also making an additional final request for new encounters just before the oath ceremony. The enhanced JIT checks consist of running background checks on CBP TECS/NCIC system and CBP OBIM IDENT system 24-48 business hours before the oath ceremony. Instead of relying on passive receipt of encounter data, USCIS ELIS now has a direct interface with OBIM IDENT that actively retrieves encounter data in a live manner when JIT checks are run. ELIS creates user tasks for review if any hits, which may include such things as the identification of possible derogatory information and multiple identities associated with a given case, are discovered from these checks.

USCIS has also redesigned the JIT check feature in ELIS to improve the usability of the user interface, and to provide the ability to manually run JIT checks at any time. The ability to manually generate JIT checks is crucial for certain field offices with large numbers of applicants participating in Naturalization Oath Ceremonies. ELIS users can now submit JIT checks on demand and review the results in a timely manner. Furthermore, the direct interface to OBIM IDENT allows users to view the OBIM IDENT data directly within USCIS ELIS on every N-400 case. This provides visibility into any derogatory information at all times.

USCIS previously reported the enhancement implemented in ELIS in February 2017 to display all names and other biographic data that was submitted via the Federal Bureau of Investigation (FBI) Name Check request. As of October 2017, USCIS ELIS now processes all FBI Name Checks through a new Customer Profile Management System (CPMS) Name Check (NC) service. This new service offers several advantages compared to the original process.

- FBI Name Check requests are sent in real time, compared to the previous service, where requests were sent once a week via a manual batch process.

- Initial responses are provided within 24 hours of submission, compared to the previous batch process, which maintained a 3 – 4 day response time.

- ELIS receives all responses (initial and final) from FBI via the CPMS NC service, compared to the previous batch process, where ELIS needed to query FD-258 Mainframe to retrieve the responses.

Over the next few months, future enhancements will provide USCIS with the ability to view memoranda detailing positive responses through a system interface. This is an improvement from the current process that occurs outside of the USCIS ELIS system.

- USCIS ELIS has also implemented a continuous immigration vetting service in conjunction with USCIS' Fraud Detection and National Security Directorate (FDNS) and CBP. ELIS publishes information to FDNS ATLAS pertaining to N-400 applicants and the status of their corresponding cases. FDNS ATLAS then publishes this information to the CBP Automated Targeting System (ATS), which begins the process of recurrent vetting. Any derogatory information discovered during this recurrent vetting is sent back to FDNS systems and made visible to officers. This automated, recurring vetting significantly increases the likelihood of detecting newly associated derogatory information without any delay or dependency on manual checks.

2. **Has USCIS completed developing an advanced ELIS N-400 training curriculum?**

Yes, USCIS continues to be committed to ensuring field office and service center personnel have sufficient training and knowledge to effectively use USCIS ELIS and its sub-systems to adjudicate N-400 applications confidently and effectively. The Advanced N-400 training

curriculum for adjudication officers includes topics on developing confidence in using USCIS ELIS, building a consistent understanding on how to use the system, and building fundamental skills to process N-400 cases from end-to-end in ELIS.

a. If so, is the new training curriculum currently available for all ELIS operators?

USCIS began offering the Advanced N-400 training sessions to all system users throughout the Field Offices Directorate (FOD) in December 2017 and plans to continue these sessions through April 2018, as determined through collaboration between the Office of Human Capital and Training (HCT) ELIS Training and FOD. Additional sessions may be delivered by HCT ELIS Training on an ad hoc basis when requested by FOD. ELIS training will be updated and continuously enhanced, as new functionality is deployed to ensure USCIS personnel have the knowledge and skills to adjudicate N-400 applications within ELIS.

b. Will USCIS conduct some form of user feedback to assess the effectiveness of the training?

Yes, and that is happening now. HCT approaches training assessment as a continuous process. Training participants are provided post-training evaluations to collect their feedback regarding training delivery after each session. This feedback is gathered to assess the effectiveness of the training on an ongoing basis. Even before we launched the training, in March 2017, HCT partnered with USCIS' Management Directorate, Office of Information Technology (OIT) to identify training issues and gaps in N-400 training as a result of identified incidents, thus leading to the development of the USCIS ELIS N-400 Training Needs Analysis survey (TNA). The TNA allowed USCIS to gather relevant feedback from end users in the following areas:

- Demographics;
- Attitude and perception about USCIS ELIS;
- USCIS ELIS training experience;
- USCIS ELIS training effectiveness; and
- Competency and confidence in using USCIS ELIS.

The findings helped USCIS develop requirements and recommendations for N-400 refresher training, future release training, and specific benefit-type training efforts that support end users' needs and appropriate USCIS ELIS training learning experiences. Based on survey feedback, HCT currently provides the following recurring N-400 training:

- Refresher training webinars (monthly and/or as required);
- Peripheral equipment training webinars (monthly and/or as required);
- FOD ELIS Guides and Trainers Call (bi-weekly);
- N-400 training Quick Reference Guides (always available on the agency internal ELIS Training Connect Site); and
- Ad hoc training (as requested by FOD).

c. **If not, when will it be completed, and what is the reason for the delay beyond USCIS' stated completion date of December 31, 2017?**

See response above. Note: In our last response to the Office of Inspector General (OIG), it was indicated that N-400 Advanced training sessions would begin December 2017 and run through February 2018. These training sessions started, as projected; however, the January session was rescheduled at the request of the Field Operations Directorate (FOD) due to timing and scheduling issues, and resumed on February 14, 2018, with additional sessions planned for March 15, 2018; and April 11 and 25, 2018.

3. **How long will 70% of team capacity be focused on addressing existing technical debt, and what does USCIS determine to be an acceptable amount of technical debt?**

USCIS developed and implemented a plan to reduce USCIS ELIS technical debt, which was identified in the first quarter of Fiscal Year 2017. USCIS allocated approximately 70 percent of team capacity towards addressing technical debt and began working on a series of initiatives to increase the system's availability and performance, as well as improving the quality and consistency of testing. These initiatives include refactoring the system code into micro services, using a platform-as-a-service for deployment and operation, improving the structure and performance of the databases, and adopting several new testing tools. As indicated in the graph below, assignment of these resources has resulted in the completion of more than 1,100 technical debt work items that are focused on improving long term system stability.
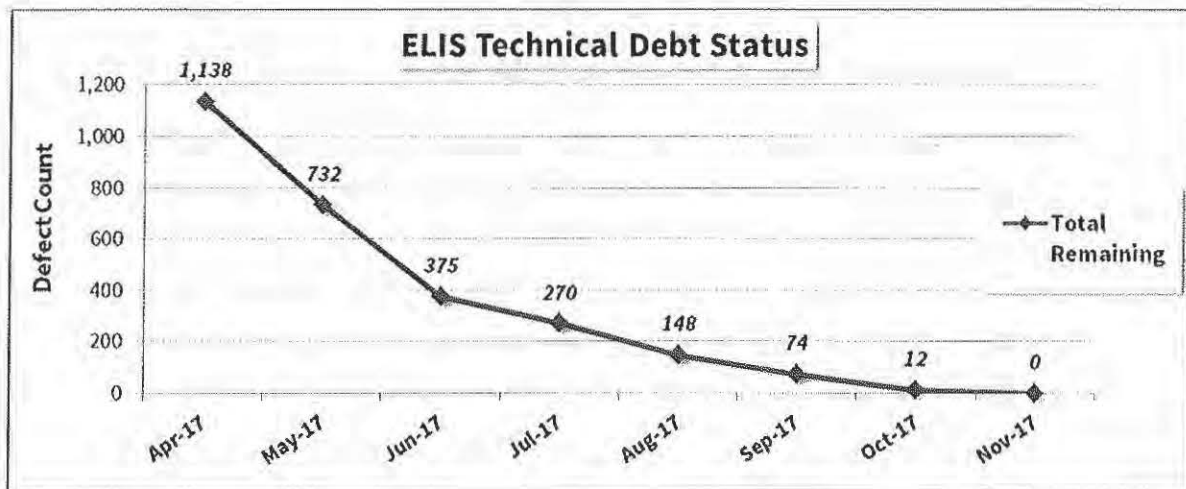
As indicated in the chart above, the Office of Information Technology (OIT) has reduced the technical debt to an acceptable level, however, consistent with best practices for large IT programs, OIT will continue to devote approximately 20 percent of team capacity towards a combination of refactoring efforts that include reduction of technical debt, resolution of functional defects, and implementation of system quality enhancements. USCIS expects that technical debt reduction will be an ongoing activity throughout the program, and the improvement of existing products and capabilities will continue until the Transformation

business objectives have been met and the program reaches Full Operational Capability (FOC).

4. **Please identify the eight new business objectives for measuring the operational impacts of ELIS.**

Transformation has incorporated a new management approach for ongoing and future USCIS ELIS development that includes improved program oversight, user feedback, and technical innovation. The new management structure has allowed USCIS to implement a technical development and procedural approach that ensures Transformation remains a results-focused digital services program that can rapidly respond to evolving changes, while delivering measurable business solutions accountable to the agency's mission.

In addition, the USCIS Executive Coordination Council redefined the Transformation program goals and established a new set of eight business objectives (also known as program goals) that will be used to measure the operational impacts of USCIS ELIS. See the table below for the program goals and measures of performance:

Program Goal	Measures of Performance
Goal 1: Effectiveness Make sure the right information is available to adjudicators and that it is accurate.	**Key Performance Parameters (KPP) #1: Reliability** ELIS shall be reliable to support the ingestion, processing, and adjudication of applications/petitions filed through electronic and paper intake channels.
	Maintainability ELIS shall be able to quickly recover from outages or failures.
Goal 2: Cybersecurity Adopt a best practices approach to securing the system from both internal and external threats.	**Continuous Monitoring & Mitigation** ELIS shall comply with DHS Sensitive System Policy Directive 4300A and NIST 800-53 Rev 4 (or any future versions), Security and Privacy Controls for Federal Information Systems and Organizations.
Goal 3: Adjudication Time Reduce the amount of time spent by adjudicators on each case.	**Adjudication Time** ELIS shall support an improvement in the year-over-year trend in cases closed per person hour.
Goal 4: Lead Time Reduce the lead time (as experienced by the applicant/ petitioner) for applications and petitions.	**KPP #2: Lead Time** ELIS shall contribute to shortening the length of time between initial receipt of applications/petitions and the issuance of proof of benefit (or decision).
Goal 5: Integration Integrate with systems in order to share information	**KPP #3: Inherent Availability (A_I)** ELIS shall be available to support the ingestion,

Program Goal	Measures of Performance
and accomplish their business goals.	processing, and adjudication of applications/petitions filed through electronic and paper intake channels.
Goal 6: Decommissioning Reduce the maintenance burden of legacy systems.	**Decommissioning** ELIS shall support the decommissioning of legacy systems.
Goal 7: Paper Movement Reduce the movement of paper files.	**Paper Reduction** ELIS shall enable potential cost avoidances through end-to-end processing of workloads ingested through electronic intake channel(s).
Goal 8: Agency Workload Increase the number of cases processed in ELIS.	**E-Processed Workload** ELIS shall be capable of end-to-end processing of workloads ingested through electronic intake channel(s).

5. **USCIS has 27 open or resolved/open recommendations from OIG and GAO related to the Transformation Program or ELIS. Does USCIS plan on closing all these recommendations?**

   USCIS has been actively working to implement ELIS recommendations and has lowered the number of open ELIS recommendations from 27 to 17.

   If so, please provide a timeline.

   Of the 17 open recommendations, USCIS has already requested that OIG close 3 (from OIG-17-11), and USCIS is planning to request that the OIG close an additional 5 (from OIG-18-23), based on actions already taken by the Transformation program.

   The estimated completion date for the nine remaining GAO recommendations is March 31, 2018, based upon actions that will be taken through the process of re-baselining the Transformation program.

   If not, please provide the rationale.

   See response above.

6. **USCIS must complete 12 additional actions required by the DHS Acquisition Review Board before moving out of a breach status. What is the completion timeline for each of the 12 actions?**

   The Transformation program is currently completing the required activities and actions, which are listed on the following table, in order to re-baseline the program and get out of breach.

No.	Action Name	Status
1	Quarterly Program Reviews	Ongoing – Completed Quarterly
2	Concept of Operations (CONOPS)	Submitted on October 31, 2017
3	Operational Requirements Document (ORD)	Submitted on December 29, 2017
4	Transformation Leadership Council Charter	Complete
5	Executive Steering Committee (ESC) Charter	Complete
6	Governance Structure Document	Complete
7	Release Roadmap	Submitted on June 15, 2017
8	Acquisition Plan (AP)	Submitted on July 5, 2017
9	Independent Cost Assessment (ICA)	Submitted data on April 5, 2017
10	Life Cycle Cost Estimate (LCCE)	Submitted (Pending approval of ORD)
11	Test and Evaluation Master Plan (TEMP)	Due January 31, 2018 (Pending approval of ORD)
12	Acquisition Program Baseline (APB)	Submitted December 29, 2017
13	Program Management Integrated Product Team (PM IPT)	Kicked off bi-weekly meetings on August 31, 2017
14	Risk Management Integrated Project Team (RM IPT)	Kicked off bi-weekly meetings on December 29, 2017
15	Monthly Risk Register	Kicked off monthly submission to RM IPT on December 29, 2017