



Transformation Roundtable Discussion with CBOs and Representatives

As a part of its ongoing public outreach efforts, USCIS recently hosted two roundtable discussions in Washington, D.C. to obtain feedback about upcoming changes to the Agency's business processes.

The September 25 Transformation Roundtable Discussion involved direct feedback from a group of Community Based Organizations (CBOs) and customer representatives regarding the development of electronic accounts. Ultimately, these accounts will form the basis for USCIS Transformation, which is a multi-year effort to create a more transparent, effective, and customer-focused organization.

The following is a summary of this meeting. USCIS plans to host more of these sessions in the future and will post details for those interested in participating as meetings are scheduled.

Event: Transformation Roundtable Discussion (CBOs and Representatives) **Date:** Sept. 25, 2009

Location: USCIS Tomich Conference Center, Washington DC; plus web-enabled teleconference

Purpose/Objectives:

- Gather feedback and input on proposed ideas around setting up and managing an online account
- Understand questions and concerns for benefit seekers, representatives and CBOs around online accounts.

Agenda:

- Introduction
- Overview of Transformation
- Overview of Proposed Online Account Concepts
- Information and Questions Regarding Four Key Topics:
 - 1) Access to Online Channels
 - 2) Preferences and Considerations for Using Online Channels
 - 3) Data Collection for Account Set-up



4) Third Party Access to Accounts

Participants:

- Attorneys or representatives from community based organizations and trade associations, including AILA, NAFSA, ACIP, Legal Momentum, Hebrew Immigrant Aid Society, USCIS Ombudsman's Office, and Central American Legal Assistance, and others

Executive Summary of Feedback:

- Participants want more meaningful information provided by USCIS for status updates
- USCIS should use online environment to better exchange information with other agencies
- Online channels should ease customers' ability to receive time sensitive information from USCIS
- Account setup and electronic filing should speed up adjudication of cases
- Participants want the ability to print certain notices from USCIS such as approval notices
- For online channels to be successful, USCIS should make them easier to use than what is currently available (e.g., customers should be able to scan in documents and submit electronically)
- USCIS should carefully consider how third party access will be provided; there may need to be different levels of access to different entities (e.g., employers, beneficiaries or attorneys)
- Online account setup and electronic filing should be extremely secure to account for privacy and identity theft concerns
- Certain segments of the immigrant population may have limited access to internet, e-mail, kiosks, or scanners; similarly, some populations may have difficulty using these channels even if they are accessible

Introduction:

Greg Collett, Chief, Office of Transformation Coordination, explained that USCIS is redesigning its business through a Transformation program led by business processes enabled by technology. Mr. Collett provided an overview of Transformation,



comparing “the Current State” to proposed concepts for how interaction with USCIS could look in the future as depicted below:

Current State	Transformation Concepts
Benefit applicants and representatives file many applications (and all supporting evidence) entirely on paper	Applicants or representatives will be able to apply for benefits through an online, electronic system centered around individual user accounts
Personal information and biometrics (e.g. fingerprints) submitted each time an applicant files a paper application	Applicants or representatives may only need to submit certain information or biometric data one time
Customers or representatives must file paper forms to update personal information (e.g. address)	Customers or representatives will have online self-service options to update some information (e.g. address or contact information)

Topic 1: Access to Online Channels:

Question #1: *Do the benefit seekers you work with have access to the Internet and e-mail? What about representatives or organizations that help prepare applications for benefit seekers?*

Summary of Responses:

- Every member of ACIP has e-mail and online access
- Online accounts should be extremely easy to set up if USCIS wants to encourage their use
- Not all individuals have regular access to the internet (e.g., students travelling from developing countries)
- Some benefit seekers would need significant assistance using online channels even if access was made available through public means (e.g., public libraries)
- There is a concern that people who have already filed an application on paper would be subject to longer processing times or would not be able to check status via an online account (especially if his/her case was filed before 2001 at a district office and they were not provided with a receipt number).



- There must be a way to ensure that a person's information is not left on a machine –ensure logout of system so residual information is not left behind (for example if a person accesses his account and files something online using library computer)

Question #2: *What's your perception of whether benefit seekers have ever used a kiosk? (Example: ticketing kiosks at an airport)*

Summary of Responses:

- USCIS should look at “lessons learned” from CBP kiosk usage
- USCIS should consider putting kiosks in public locations (e.g., libraries or malls) and should be careful not to put them in secure buildings where people will need an Infopass appointment to get inside
- If kiosks are a viable solution, they should be well-maintained, reliable and have multiple language capabilities
- If kiosks are located in a library or public place, concerns may be raised about privacy as individuals may need sensitive documents to file applications via a kiosk
- Kiosks might be most appropriate for checking status, or other “simple” tasks; some types of applications are very time consuming and usually people don't have all of the documentation with them – these might be too complex for kiosks to be used efficiently
- USCIS should make sure the public knows how to use kiosks and that they are free for use
- USCIS may wish to provide assistance at kiosks for populations who may be unfamiliar with new technology (e.g., elderly). Account for the potential that kiosks may have long lines to use them
- If kiosks will be a primary channel for exchanging electronic information with USCIS, the Agency should account for the potential that kiosks could develop long lines of customers
- Password access to kiosks may pose security or concerns if benefit applicants forget passwords or lose written documents with passwords included

Question #3: *Do the benefit seekers you work with have access to high-resolution scanners? What about representatives or organizations that help prepare applications for benefit seekers?*



Summary of Responses:

- All ACIP members have ready access to scanners at all times and are familiar with their use
- Most members of AILA and NAFSA, and some CBOs, have access to more sophisticated technologies like scanners and have the ability to scan documents; some CBOs, however, do not have scanners and lack the financial capacity to update technology on a regular basis
- If people are going to be able to file applications at kiosks, scanners should also be available at those locations
- USCIS should maintain current paper-based system for applicants who may not be familiar with new technology (e.g., elderly)

Topic 2: Benefits, Preferences, and Considerations in Doing Business Online with USCIS

Question #1: *If you could communicate with USCIS online, what would you want to be able to do?*

Summary of Responses:

- Participants would like USCIS to share information with other government agencies; USCIS should heavily involve federal stakeholders in any plans to create an online system for exchanging immigration information
 - SEVIS II is developing customer accounts; if someone already has a SEVIS account, it would be good if that person could have the information from that account transferred into the USCIS system
 - If customers have accounts with other agencies (e.g., DOL iCert account) then one should be able to import the information into USCIS systems; this would save USCIS some resources since DOL would have already done “bone fides” investigation of the information provided
- Participants expressed interest in submitting applications online and engaging with USCIS while the application is pending to receive meaningful case status updates
 - Case status information online should be posted in real time or close to it
 - USCIS should provide some capability for troubleshooting
 - If benefit applicants can check their case status online, the online status should show what was done as well as “next steps”



- Participants would like for USCIS to make it easier for time sensitive information to reach them in a more timely manner
 - If a request for evidence (RFE) or NOID (Notice of Intent to Deny) is issued, benefit seekers and representatives should have to provide them electronically so that there is as much time as possible to respond
- Online communications should increase the speed of USCIS' processing of cases; if responses to requests for evidence, etc. can be filed online, then adjudication times should improve

Question #2: *What concerns do you have about doing business with USCIS online?*

Summary of Responses:

- Participants want ability to print approval notices; online-only receipt of notices poses concerns for how benefits seekers or representatives would provide proof of filing
- Sometimes representatives' only proof of filing is an actual paper copy of the application as filed, or a Federal Express confirmation of delivery.

Question #3: *What do you think about the potential for mandatory e-filing?*

Summary of Responses:

- Employment-based applications or others such as replacement of lost I-94 card (Form I-102) or Form I-824 (Action on approved petition) may be easier to e-file; It would be easier for employment based applications to be e-filed
- Participants suggested other forms for e-filing related to the employment-based fifth preference (i.e. Form I-526-Petition by Alien Entrepreneur and Form I-829 Petition to Remove Conditions)
- USCIS should improve current state of e-filing before mandating
- USCIS should create ways for customers or representatives to link supporting documents with e-filed applications
- E-filing is a nice alternative, but it should be an alternative rather than a requirement

Question #4: *How could USCIS could incentivize the setup of online accounts and electronic exchanges of information for benefit seekers or representatives?*

Summary of Responses:



- Online accounts should offer: time savings; quicker processing times; more meaningful case status updates provided; and delivery of electronic status in real time at key points in the application process
- E-filing systems should interact with existing off-the-shelf case management software systems used by many attorneys
- Electronic system interfaces with other agencies such as DOL
- USCIS should consider reduced filing fees for applications that are e-filed
- USCIS could provide interim work authorization for those who apply for extension of employment authorization document online

Topic 3: Data Collection for Account Set-up

Question #1: *What do you think about the data elements USCIS is suggesting it may request from different parties to establish online accounts?*

Summary of Responses:

- Information provided for representative account is same as on G-28
- USCIS should be collecting physical address from each person setting up an account
- Some benefit seekers may be from the same place and have the same name; USCIS should consider an additional unique identifier for account setup (maybe Alien number for persons already in system)

Topic 4: Third Party Access to Accounts:

Question #1: *How much information should representatives be allowed to view about a benefit seeker's account? (Example: entire application history or only applications filed by that representative)*

Summary of Responses:

- Employers will want the flexibility to determine who will receive notices/have access if employer is filing application on behalf of beneficiary- sometimes employer will want notice, sometimes will want benefit seeker to have it, sometimes just attorney, etc.
- Once an individual is recognized as a representative or attorney, he/she should be able to have access to client's whole file (as if you had filed a FOIA request)



- USCIS should consider asking for authorization to file on behalf of someone online; for example, when an attorney files a PERM application on behalf of an employer (like with DOL), the DOL asks employer if it authorized application
- USCIS should allow owner of an account to enlarge or limit the access available to third parties; For example, allowing employers to limit an employee's access to certain information on form I-140 (such as gross income of company)
- Access to USCIS information needs to be limited so that abusers or human traffickers are unable to find out about filings or obtain status information
- Some persons may not want anyone aside from their representative to have access to benefit or account information
- Some benefit seekers may not want others in their immediate family to have access to see what has been filed, even if they are in the same family; for example, youth applications for asylum
- Sometimes sponsors (such as for marriage-based green card) do not want the beneficiary to see financial information provided to USCIS on their behalf