



Executive Summary

June 4, 2010

Information Sharing Session – Validation Instrument for Business Enterprises (VIBE)

Background

On May 27, 2010, the Office of Public Engagement and the Service Center Operations Directorate hosted an information sharing session to inform stakeholders of the new Validation Instrument for Business Enterprises (VIBE) program. VIBE is a web-based tool developed by USCIS that will be used by Immigration Services Officers (ISO) to uniformly validate the current level of business operations of the company or organization seeking to employ a foreign worker by using commercially available information from an independent information provider (IIP). In September 2009, USCIS awarded a contract to Dun and Bradstreet (D&B) to serve as the IIP for VIBE.

Principal Themes

USCIS assured stakeholders that petitions, with supporting evidence that does not match the relevant information obtained through VIBE, would not automatically be denied. If necessary, USCIS will issue a Request for Evidence (RFE) or Notice of Intent to Deny (NOID) to provide the petitioner with an opportunity to address inconsistencies revealed during the processing of the petition and final decisions will continue to be based on the totality of the evidence.

VIBE will provide ISOs with information on the petitioning company or organization's existence and viability, including:

- Business activities;
- Financial standing;
- Number of employees;
- Relationships with any other entities, including foreign affiliates;
- Ownership;
- Date of establishment; and
- Current address.

USCIS indicated that the ISOs will not see the full D&B report for a petitioning organization but select information as noted above. Training provided to the ISOs will emphasize the need to balance information obtained through VIBE with information provided in the petition as well as other evidence contained in the record. If an ISO determines it is necessary to request further evidence from a petitioner due to information in VIBE, the RFE or NOID issued to the petitioner will clearly state that VIBE is the source of the information.

To facilitate matching the petitioner with VIBE data, stakeholders were advised to use the petitioner's address in part #1 of the petition, rather than an address belonging to their preparer, attorney or representative.

Dun and Bradstreet (D&B) representatives provided a visual presentation and information that included:

- Who D&B is today - Provider of commercial information with a global database;
- History of D&B - Established in 1841 and creator of the D-U-N-S Number, a unique company identifier;
- DUNSRight Process – Patented Quality process that has the capacity to match USCIS data with D&B data
- Contents of the database - primarily comprised of small businesses
- How D&B data is collected and verified

Dun & Bradstreet also clarified that petitioners do not need to subscribe to D&B in order to update their company information. However, new companies are encouraged to contact D&B to obtain a DUNS number. Customers can call D&B (1-800-234-3867) or visit their website (www.dnb.com) where they will find a link to “Update Your D&B Report.” There is no fee to update this information. Prior to updating a company's record, D&B performs a series of edits and validations to verify the accuracy of the information reported by the business. Upon verification, the new information is reflected within the customer's record within about 4 days.

Next Steps

USCIS would like stakeholders to provide comments about the VIBE program and has established an email account at VIBE-feedback@dhs.gov to capture this feedback. Your comments and feedback will also help to refine our public materials, such as a Fact Sheet and FAQ, that will be available shortly.