U.S. Citizenship and Immigration Services

September 7, 2011

Executive Summary

USCIS Transformation:
December 2011 Deployment of the New Electronic System

Background

On July 27, 2011, the Office of Transformation Coordination (OTC) and the Office of Public Engagement (OPE) hosted a stakeholder engagement to review the implementation and use of the agency's new online system. During the session, USCIS representatives provided an overview of the transformation initiative, introduced the deployment strategy, and explained how external stakeholder feedback has informed the development and deployment of the new online system. In addition, USCIS heard stakeholder concerns about obstacles that may limit or deter voluntary usage of the system in the first release.

Overview

Jacqueline Gerety, Deputy Chief of OTC, provided an overview of USCIS Transformation. She explained that Transformation is an agency-wide initiative that will move immigration services from a paper-based business model to an electronic account-based operating environment. As part of the effort, USCIS is developing a simplified, online system for applicants and their accredited representatives to submit and track applications as well as interact with USCIS. Ms. Gerety further described how business processes will change so that USCIS may deliver more efficient and consistent immigration services and provide a better customer experience to applicants and stakeholders. Particular features of the electronic system include an online wizard to guide customers through an application step-by-step; the ability to submit payments electronically; capability to retain biographic information and evidence for multiple applications; and online access to more specific and timely case status information.

USCIS Transformation will take place in a series of releases scheduled to occur approximately every six months after initial deployment in December 2011. Each release will enhance system capabilities and/or expand benefit types available for electronic filing. In the first Transformation release, USCIS will begin to build the foundation for an automated system for adjudication of the stand-alone Application to Extend/Change Nonimmigrant Status (Form I-539) benefit type. The initial release will directly affect applicants who are attempting to extend, change or reinstate the following nonimmigrant visa classifications:

Classification	Definition
B	Temporary Visitor for Business or Pleasure
F	Academic Student
J	Exchange Visitor
M	Vocational or Other Nonacademic Student

Applicants who need to submit other benefit requests concurrently with the Application to Extend/Change Nonimmigrant Status are still required to file by paper. In addition, a number of the foundational system capabilities will be available in December 2011.

Over the last several years, USCIS has sought stakeholder feedback in local listening sessions and national engagements to help inform the development and deployment of the new system. These sessions have been instrumental in helping USCIS define the system requirements needed expand the functionality available in the initial and future releases. Ms. Gerety provided specific examples of how USCIS has used stakeholder feedback in the development of the initial release:

- Electronic filing will be voluntary to allow stakeholders time to transition to the new electronic environment and to provide USCIS an opportunity to further review mandating e-filing;
- USCIS will have technical assistance via phone service available to support customers using the online system;
- USCIS, in cooperation with other federal agencies, has launched a national initiative to combat the Unauthorized Practice of Immigration Law (UPIL) – See www.uscis.gov/avoidscams.

Ms. Gerety informed stakeholders that system requirements must be finalized many months prior to a deployment and there is often a lag between changing or adding functionality and requirements to the online system and when those changes are implemented and available to the public. She provided examples of system features in development for future releases that USCIS has heard are important to external stakeholders:

- Electronic Data Interface Standards (EDIS) so that third-party immigration software systems can link to the USCIS system;
- Organizational accounts so that university officials, paralegals, community-based organization staff, and congressional staff will be able to access relevant immigration information;
- Ability to establish the attorney-client relationship electronically;
- Ability for customers filing through an attorney or accredited representative to submit their own payment online.

Finally, Ms. Gerety indicated that USCIS has received additional feedback from stakeholders that USCIS is unable to address at this time or is continuing to consider for future releases. Specifically, many stakeholders found planned security procedures, such as password requirements and second-factor authentication, to be overly burdensome. However, USCIS must comply with DHS system security requirements and as a result these security procedures cannot be removed or waived. Additional stakeholder feedback that USCIS is considering includes:

- Allowing customers to skip ahead in the online wizard to enter information in data fields;
- Providing an editable electronic form so that applicants and/or their accredited representatives can view and complete multiple data fields on one screen;

- Customer access to scanners and other electronic equipment;
- Use of international mobile phones for second-factor authentication and contact information;
- Capacity building for community-based organizations to support e-filing.

USCIS encouraged stakeholders to continue to provide feedback on which features and functions will be most important to address in a timely manner to encourage voluntary adoption of the new electronic system. In addition, USCIS continues to seek information on how to best support stakeholders through the transition so that obstacles or stakeholder concerns can be addressed in a timely and efficient manner.

Features or Functions to Address

Stakeholders expressed concern that some features and functionalities such as EDIS and organizational accounts are slated for later releases. Individuals asserted that USCIS should strongly consider moving these functionalities up as early as possible to support greater voluntary adoption of the new electronic system. Specifically, attorneys and organizational representatives, such as designated school officials (DSOs), are concerned that without these functions they will not be able to support applicants as much as they have previously through paper filing. USCIS indicated that they are very aware of these concerns and USCIS is looking for ways to support applicants and their accredited representatives through this transition. At the same time, USCIS wants to ensure that the foundational functionalities work well and that the system can support these additional features moving forward. USCIS is aware that the initial population utilizing the system may be limited; however the first release will allow the agency to monitor system performance prior to expansion of features and functions.

Participants also suggested that federal partners such as U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and the Department of State (DOS) should have access to the system as soon as possible. USCIS stated that the new system will share information with programs such as the Student and Exchange Visitor Information System (SEVIS) and Systematic Alien Verification for Entitlements (SAVE), but that federal partner agencies will not have direct access until future releases.

Additional features and functions that stakeholders suggested might be useful include allowing stakeholders to navigate through the online wizard as efficiently as possible by completing multiple data fields at once; providing space for attorneys to include comments or queries for their applicant or client; system recognition of Internet Protocol (IP) addresses; and more variation in the ways in which an individual can go through the second-factor authentication process.

Overcoming Stakeholder Obstacles or Concerns

Stakeholders also provided insight on how USCIS might be able to assist applicants in overcoming obstacles or concerns to encourage voluntary adoption of the new online system. One individual suggested that there should be a testing phase that would allow external stakeholders to pilot the system prior to an official deployment. USCIS stated that the December 2011 deployment will affect a very limited portion of the customer population and that USCIS will monitor deployment and continue to seek stakeholder feedback to prepare for future releases.

A particular issue of concern for applicants and accredited representatives in the first release is the role of the Certificate of Eligibility for Nonimmigrant (F-1) Student Status-For Academic and Language Students (Form I-20A-B) or Certificate of Eligibility for Nonimmigrant (M-1) Student Status for Vocational Students (Form I-20M-N). This form is currently generated by SEVIS (owned and managed by ICE) and provided by schools to individuals planning to study in the United States. In the current paper I-539 adjudication process, an I-20 is submitted by the applicant as part of the documentation.

When the adjudicator approves an application, the adjudicator stamps and signs the document then returns it to the applicant. International student and scholar advisors have indicated that the applicant uses this document to confirm their student status to certain federal, state, and local agencies. Although the Certificate of Eligibility does not convey a legal status, stakeholders are concerned about what will happen in an electronic environment when a stamped certificate is not generated. USCIS and ICE are aware of this issue and are currently looking at ways in which to remedy this concern. USCIS also is educating other federal, state, and local agencies about any changes in the process.

One participant expressed concern that the new system would not eliminate fraud or security risks. USCIS stated that, as with our current, paper-based model for submitting immigration-benefit requests, educating individuals on how to avoid scams and encouraging communities to report scams are essential to combating the unauthorized practice of immigration law. USCIS Transformation works in close collaboration with the Unauthorized Practice of Immigration Law (UPIL) initiative, a multi-agency effort to combat the fraudulent practice of immigration law. See http://www.uscis.gov/avoidscams.

Stakeholders also queried about applications that require biometrics and access to Application Support Centers (ASCs) as well as when USCIS will consider an application accepted or received. USCIS indicated that the first release does not include applications that require biometrics and that there are no plans to change the purpose or locations of ASCs in the first or future releases. In addition, USCIS will follow the same regulations and use the same procedures currently in use for paper processing, to determine when an application is properly filed.

Supporting Stakeholders through the Transition to Electronic Filing

USCIS continues to identify effective means to support stakeholders through the transition to electronic filing. Stakeholders stated that they were very encouraged by USCIS's decision to allow voluntary use of the new online system rather than mandating e-filing. One stakeholder asked about USCIS plans to build capacity in communities that will be directly affected by the next release, approximately six months after initial system deployment in December 2011. USCIS stated that communications and engagement strategies are developed for each release and that the public will see increased communications and engagement leading up to and through deployment of each release. USCIS plans to continue to engage communities on a local and national level to determine effective strategies that the agency can implement to support community-based organizations and individual applicants.

General Comments

USCIS will continue to solicit regular feedback from internal and external stakeholders on the programs and processes necessary to support the new electronic system. Additional information about the USCIS Transformation can be found on the USCIS website at www.uscis.gov/transformation. Over the coming months, USCIS will update the website to provide external stakeholders and applicants with the latest information and assist in preparing for the transition to the new electronic system.