



Meeting Notes

January 20, 2010

Collaboration Session #2 : External Data Interface Standards

Background

USCIS hosted the second of a series of scheduled collaboration sessions on January 20, 2010 to further discuss the development of the External Data Interface Standards (EDIS). EDIS includes the standards required to transfer benefit data from a third party system to the USCIS system. Posted below is a summary of this event and the questions asked by stakeholder participants.

Event: EDIS Exchange #2 Collaboration Session
Date: Wednesday, January 20, 2010, 2:00-4:00pm
Participants: Nearly 30 members from the private sector, representing many industries including case management system providers, software developers, immigration attorneys and representatives, financial institutions, and trade associations.

Agenda

- Review the concept of operation and the development and delivery schedule of EDIS
- Introduce the immigration benefit request intake process
- Understand the system registration process and security requirements
- Discuss the NIEM IEPD Process and Artifacts
- Collect feedback and input from stakeholders on all the topics discussed

Questions and Answers

Throughout the agenda, attendees participated in an open question and answer session with USCIS representatives. Below is a summary of the Q&A:

Q: When you mention payment information, are you talking about credit card information or waiting for a check to be sent in separately?

A: We are referring to various forms of electronic payment, such as credit card information. We would not hold the application to wait for the check to be mailed. We are not talking about any follow up paper payment methods.

Stakeholder Comment: We would like more information about the security around passing payment information.

Post Event USCIS Response: We will provide more information for further discussion over the next several collaboration sessions.

Q: Our clients usually pay by check. Are you saying that we would need to send an electronic payment first in order to submit the application?

A: Yes, you may need to collect the money and make sure it clears your system before submitting the data. You would follow your internal protocol on how you collect payment from your clients. We envision, for example, you enter the data in your system and save it. Once the payment clears, you would then submit the application and payment.

Q: Have you thought about setting up and offering an attorney payment account, like Pay Pal through USCIS? It would be like a debit account where the attorney would keep the account balance up and USCIS would debit from it for the transactions.

A: No, we have not considered that. We will take note and forward your suggestion.

Post Event USCIS Response: Although the suggestion is conceptually appealing, the development and maintenance of such an initiative may not be feasible. It is unlikely USCIS will pursue this initiative.

Q: In the second instance where a rejection response may occur, why would you not send the response immediately versus sending by snail mail?

A: Snail mail is just an example. The response would come in whatever communications channel is selected for the filer's or filing representative's account, such as snail mail or email. There may be a delay in determining if the response would be accepted or rejected. We would not want the user to wait 15 minutes waiting for a response. This is still being discussed so if this does not meet our stakeholders' needs, we want to know that. So, this is helpful feedback?

Stakeholder Comment: Yes, as a practitioner, we will want to check status daily so it would be nice to get a response quicker, like the next day.

Q: On the forms list that you showed, there were a number of those forms that require supporting documents. Those documents have to go along with the application. Will you be supplying a way to submit those electronically and if so will you require them to be sent electronically or can we do it later?

A: Yes, all of the forms listed will be able to be submitted electronically via the interface. If available in an electronic format (e.g., PDF) you will also be able to submit electronically any additional forms of supporting evidence, such as birth certificates. The completeness rules regarding how much benefit request data and supporting evidence USCIS will require in order to accept a benefit request is still under review. While we want a case to be as complete as possible at the point of intake, it is possible that the completeness threshold for acceptance/receipting will be lower than what is required to render an approval/denial decision on a case.

Q: Are the technical specifications regarding documents that may be electronically transmitted included in EDIS?

A: Yes

Q: If one person sends in two applications for two separate benefit requests, how would that be handled?

A: If one practitioner sends in multiple applications in a batch, the interface will treat each application separately.

Stakeholder Question: That is not what I'm asking. What if a person sends in an application, they would have an account, right? Then the same person wants to submit another application, what happens then?

Follow Up Response: Once an account is established and another application comes in, our system will be able to identify that person's existing account and link the cases together.

Q: What happens to current profiles already established for the eFiling system?

A: This effort is completely separate from that concerning the profiles created in eFiling. Once this is fully implemented, it will replace what exists today for the eFiling profiles.

Q: I think this sounds easy to reference. We give our clients a unique number and USCIS will assign a unique number and then we can just link them together. It doesn't matter how many applications or filers there are.

A: Thank you for your comment.

Q: I think as for uploading evidence, it seems it should be mandatory so people don't take advantage of the system. Currently, USCIS requires the evidence to all be there to submit the case.

A: You are right about USCIS wanting all the information up front. The question we are really debating is what should be mandatory to accept an application? It is really not whether USCIS gets the information, but how soon. We will "accept" or "reject" at the point of intake (i.e. receipt). From there, the process then proceeds to determine if this benefit is approved or denied. If we need more information to make that determination, we would then send a request for evidence.

Stakeholder Comment: I just think that is a big security hole.

Follow Up Response: Let me just caveat that I am not an USCIS employee so the USCIS folks around the room with adjudication experience, please feel free to chime in. However, the current practice is that some benefit requests are accepted even if all the evidence is not present.

Stakeholder Comment: Then you mean you will have a holding bin which requires hard drive space, and then the benefit request just sits there until you receive all the evidence and the request is then pushed out for further processing? If that is the case, when do you take the fee?

Follow Up Response: We'd take the fee at the intake process.

Stakeholder Comment: Right. That is why you all should have all the information up front.

Follow Up Response: Thank you for your comment.

Q: Will be accepting documents as PDFs or what format would you accept?

A: We do not have a definite answer at this time, but plan to accept a wide range of formats to be described via the EDIS specification.

Q: How will you handle signatures?

A: It would be electronic signatures, similar to how a user would "sign" their tax returns online for IRS. The details have not been finalized so we'll have to look into it and follow up with more details later.

Post Event USCIS Response: USCIS will continue internal discussions on this issue and more details will be provided at subsequent collaboration sessions.

Q: If a filer submits the application by paper first, would the filer be able to then utilize the system to system interface later? For Status?

A: The third party system might have to comply with EDIS but if there is a case ID assigned, then yes, it would be possible. Let us look into this more and follow up.

Q: What about the organization or representative who submits the information?

A: Yes, the representative would have an account and the individual seeking the benefit would also have an individual account. Organizational accounts (e.g., IBM is petitioning for a group of workers to come to

the U.S.) are not in scope for this initial release but the case would be linked to both the individual and the organization.

Q: For a person who moves from company A to company B, would the person get two separate IDs or use same one?

A: If I had an account established because I was seeking a benefit and Company A was sponsoring me, I would have an account established stating that. If I moved to Company B and it became my new sponsor, my account would be updated to reflect that. So, the answer is one person would have Company A and Company B linked to their account.

Q: I would think signatures would be similar to how eVerify does it and eVerify has an organizational level type of client.

A: Yes, the attorney would receive an account and the individual would be linked. I may not have been clear that both the representative and the individual would have accounts.

Q: What is the IEPD training?

A: The IEPD training is provided by a third party training company. It is not offered by USCIS and is not required. It is just helpful and free if you want to learn more about NIEM development. NIEM is relevant beyond USCIS and is a Government-wide standard. IJIS helps manage the NIEM standards program and is funded with Department of Justice grants.

Q: Would this work with submitting data with Department of Labor? Are you considering what Labor is offering?

A: Yes, USCIS intends to leverage what DOL is offering but we are not sure what that is yet. USCIS has identified several other government agencies with which USCIS wants to develop system to system interfaces. Department of Labor is one of them for Transformation.