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USCIS Response to the Citizenship and Immigration Services Ombudsman's (CISOMB) 2011 Annual Report to Congress

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Homeland
Security

*U.S. Citizenship and
Immigration Services*

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PUBLIC ENGAGEMENT	1
III.	HUMANITARIAN	3
	A. Policy Memorandum for T Nonimmigrants	4
	B. Status Issues for Derivatives of U Visa Recipients	4
	C. Training for VAWA Interviews	4
IV.	FAMILY	4
	A. Retrogression	4
	B. Change of Address	5
	C. Survivor Benefits	6
	1. Policy Memorandum	6
	2. Motion to Reopen with Fee	6
	3. Case Tracking	7
	4. Humanitarian Reinstatement	7
V.	EMPLOYMENT	7
	A. VIBE	8
	1. Accommodation Addresses	9
	2. VIBE-Related RFEs	9
	B. EB-5 Immigrant Investor Program	9
	1. Regional Center Attorneys	10
	C. RFEs	11
	1. RFE Review	11
	2. RFE Templates for Hs and Ls	11
	3. Leader for RFE Project	12
	4. RFE Rates	12
	D. L-1B Nonimmigrants	12
	E. E-Verify	13
VI.	INTERAGENCY COORDINATION	14
	A. Military Members and Their Families	14
	B. Individuals in Removal Proceedings	14
VII.	CUSTOMER SERVICE	15
	A. Interactive Voice Response (IVR)	15
	B. Scripted Information	16
	C. Service Requests	16

VIII. TRANSFORMATION	16
A. Accessibility for Non-Computer Users	17
B. Immigration Practitioners	17
C. Managing Changes	17
IX. CONCLUSION	18
X. APPENDIX A: PRIOR RECOMMENDATIONS	19
XI. APPENDIX B: ACRONYMS AND INITIALISMS	22

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I. INTRODUCTION

U.S. Citizenship and Immigration Services (USCIS) thanks the CIS Ombudsman (CISOMB) for the analysis provided in the 2011 Annual Report to Congress. USCIS appreciates the candid review of the Agency's operations and procedures.¹ This response provides updates to programs and concerns raised in the report and highlights just a few of the Agency's successes during Fiscal Year (FY) 2011.

II. PUBLIC ENGAGEMENT

In FY 2011, USCIS pursued ambitious goals for public engagement to meet its objectives of consistency, integrity, transparency, and efficiency. The USCIS Office of Public Engagement (OPE)² facilitated 109 national engagements involving approximately 12,000 individuals. Field offices hosted 80 "open houses" and organized over 2,500 outreach activities reaching approximately 114,000 individuals.

The Vermont Service Center (VSC) conducted more than 35 training and outreach sessions across the country on T and U visas and the Violence against Women Act (VAWA). Each session targeted law enforcement officials and community-based organizations (CBOs), providing each group with information on the immigration remedies available for victims of crime, trafficking, and domestic violence. USCIS also reached thousands of customers and community service providers through quarterly national Spanish-language engagements ("Enlaces"). These engagements were positively received and widely attended. To expand on this success, USCIS also began planning to extend into other languages.³ Beyond these national engagements, USCIS provided engagements in multiple languages at the field level including more than 30 engagements held in Spanish, Arabic, French, Amharic, Chinese, and Vietnamese.

In preparation for the launch of the USCIS Electronic Immigration System (ELIS), the Agency's new online case management system, USCIS sought to better understand the needs of its customers and prepared the public for a multiphase project to move the processes of filing for and adjudicating immigration benefits from a paper-based system to an electronic, account-based process. The Office of Transformation Coordination (OTC) hosted 33 in-person local listening sessions, nine national webinars and engagements, and regularly interacted with over 1,500 external stakeholders interested in External Data

¹ In this response, "USCIS" and "Agency" are used interchangeably.

² On May 7, 2012, USCIS realigned its organizational structure to create the Customer Service and Public Engagement (CSPE) Directorate.

³ On February 16, 2012, USCIS hosted its first national engagement in Chinese. This series of engagements is called "Jiao Liu."

Interface Standards (EDIS). EDIS allows third-party system providers to electronically transmit benefit requests to USCIS. These engagements apprised stakeholders about the development, implementation, and use of USCIS ELIS and provided USCIS with an opportunity to solicit feedback on topics like mandatory e-filing and the USCIS customer service experience.

The Office of Citizenship sought to promote citizenship and integration programs as part of the Citizenship Public Education and Awareness initiative. USCIS used national and local engagements, including Immigration 101 and Naturalization 101 information sessions, to promote awareness of the rights, responsibilities, and importance of U.S. citizenship and the resources available to assist immigrant-serving organizations and permanent residents prepare for naturalization.

USCIS also continued to strengthen its relationship with the Department of State (DOS) Consular Affairs Bureau. Together USCIS and DOS coordinated joint outreach trips to Detroit, Michigan; El Paso, Texas; Los Angeles and San Francisco, California; Orlando, Florida; and Boston, Massachusetts. During these successful trips, USCIS and DOS held engagements that included Congressional staff briefings, stakeholder meetings, and briefings for local police departments, foreign students and foreign student advisors, and state and local government officials. Through these meetings USCIS and DOS provided an overview of the entire visa process and clarified USCIS and DOS's respective roles in the process. Presentations were also provided on international adoptions, international child abduction and consular notification, and the T, U and VAWA programs.

In addition to engagement with other Federal agencies, USCIS hosted a number of national stakeholder engagements to support the USCIS Systematic Alien Verification for Entitlements (SAVE) and E-Verify programs. Participants included more than 200 state, local, and tribal officials. These efforts not only supported the E-Verify and SAVE outreach, but also disseminated program information to state and local government stakeholders, including state workforce and employment agencies, governors' offices, and state chambers of commerce.

In June 2011, USCIS launched a large-scale public education initiative entitled "The Wrong Help Can Hurt," which focuses on the unauthorized practice of immigration law. The initiative is built upon three pillars: public education, capacity building, and enforcement. As part of this effort, USCIS facilitated meetings with federal, state, and local government partners, providing support for capacity building and enforcement efforts with seven partner cities. USCIS hosted a multi-agency, multi-city launch event to kick off the nationwide initiative.

Through this important initiative, USCIS and its partners have provided individuals with critical information to enable them to avoid immigration scams and make informed choices when seeking legal advice and representation. To support the effort, USCIS created brochures in 14 languages and posters available in English and Spanish. The Agency also developed a video and public service announcements for print and radio. To house all of its public education material and provide a centralized source of information and links to Federal partner sites, USCIS developed a Web resource center. The center averages 450

visits per day. USCIS has distributed more than 260,000 Spanish and English language UPIL brochures, has printed Chinese and Creole versions of the brochure, and continues to hold national and regional engagements with state and local partners.⁴ These engagements are used to define relevant issues, explore solutions, and identify appropriate mechanisms for reporting and avoiding immigration scams and UPIL.

USCIS also used engagement to reinforce the Agency's strong commitment to provide transparency into USCIS business process and incorporate stakeholder feedback in the development of policies, procedures and regulations. In support of this commitment, USCIS hosted a series of engagements designed to inform the development of the Agency's policy and training materials. USCIS also sought feedback by posting for comment 37 draft and interim memoranda on its Web site. USCIS also extended the length of time for comment on complex draft policy. In response to the posts, the Agency received 243 comments.

Stakeholders welcomed USCIS's commitment to post draft policy memoranda and accept public comment. USCIS continues to experience strong stakeholder participation through all of its engagement mechanisms and expects to continue this trend through FY2012 and beyond.

III. HUMANITARIAN

USCIS administers a number of humanitarian programs to assist individuals in need of aid or protection from abuse, oppression, emergency medical issues, and other urgent circumstances. As the CISOMB Annual Report recognizes, USCIS has been proactive in many of its programs serving the needs of victims of crime. It has increased stakeholder outreach initiatives and access to the VSC and has advanced policy through OP&S to carry out congressional intent.

USCIS marked a significant milestone in providing relief to victims of crime when it approved 10,000 petitions for U nonimmigrant status for the second consecutive year. USCIS further demonstrated its commitment to its humanitarian programs by providing training in 30 cities and on the Internet for Federal, State, and local law enforcement and non-governmental organizations on immigration protections that are available to immigrants who are victims of human trafficking, domestic violence, and other crimes.

In the Annual Report, the CISOMB offered suggestions for enhancing the programs available to certain victims: T nonimmigrant status, U nonimmigrant status, and protections available under the Violence Against Women Act (VAWA). As discussed below, USCIS is already working to address many of these issues.

⁴ State and local partners include law enforcement agencies, bar associations, and community-based organizations, among others.

A. Policy Memorandum for T Nonimmigrants

T nonimmigrant status is available to victims of severe forms of human trafficking who assist law enforcement in the investigation and prosecution of human trafficking cases. USCIS recognizes the need to address the “trauma exception” to the requirement that victims cooperate with law enforcement. Accordingly, USCIS is working diligently on policies to address the needs of these individuals.

In 2010, USCIS published a general memorandum on the changes to the T and U nonimmigrant programs as a result of the Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA 2008).⁵ This policy discusses the “trauma exception” and includes non-exhaustive examples of types of evidence a petitioner may submit to meet this exception.

B. Status Issues for Derivatives of U Visa Recipients

Current regulations prevent USCIS from granting derivative U status after a derivative turns 21 years of age, even if the individual was under 21 years of age at the time of filing the derivative petition.⁶

C. Training for VAWA Interviews

USCIS recognizes that adjudicating VAWA cases requires sensitivity, confidentiality, and specific expertise. This past year, USCIS policy experts traveled across the country to train local Immigration Services Officers (ISOs) on specific issues related to adjudicating VAWA petitions. As the CISOMB noted, several USCIS field offices have piloted specialized training programs.

IV. FAMILY

USCIS understands that predictability and transparency in the visa allocation process is important to individuals who have applied for family-based visas. Accordingly, USCIS has published information, including policy guidance, and will continue to make improvements to these communication efforts for individuals affected by visa retrogression.

A. Retrogression

Congress sets limits on the number of immigrant visas, including certain family-based visas, that can be issued each year. The Department of State publishes a monthly Visa Bulletin, which lists the cut-off dates that govern visa availability and determines which beneficiaries of family-sponsored and employment-based petitions are eligible to file for adjustment of

⁵ USCIS Policy Memorandum, “William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008: Changes to T and U Nonimmigrant Status and Adjustment of Status Provisions” (July 21, 2010); <http://www.uscis.gov/USCIS/Laws/Memoranda/2010/William%20Wilberforce%20TVPRAAct%20of%202008%20July%20212010.pdf>.

⁶ See 8 CFR 214.14(f).

status. Usually the cut-off dates on the Visa Bulletin move forward in time, but not always. When high demand for visas in a particular time period causes visa usage to accelerate, the Visa Bulletin may be adjusted so that cut-off dates “retrogress” or move backwards.

Demand for many family-based visa categories was relatively low in FY 2010. Consequently, the cut-off dates for many family-based visa categories advanced rapidly. By the early part of FY 2011, however, the demand for visas increased and eventually surpassed the available supply. As a result, the cut-off dates for many family-based visa categories retrogressed, and applicants in those categories may now need to wait several additional years for visas to become available. USCIS has taken steps to assist these individuals. On December 15, 2010, USCIS issued an interim policy memorandum, which is publicly available on the USCIS Web site⁷ and was posted for public comment. This policy memorandum explains that retrogressed cases that were sent to the field for an interview will be returned post-interview to the National Benefits Center (NBC) for family-based cases or the Texas Service Center (TSC) for employment-based cases. If an applicant needs to submit additional information after he or she has been interviewed, the applicant may submit it to the NBC or TSC, unless instructed differently at the time of interview.

On June 14, 2011, USCIS published a new page on the USCIS Web site focusing on issues and requirements related to applicants with retrogressed visa cases.⁸ This page emphasizes the need for applicants to update USCIS as to their current address to avoid missing important correspondence and deadlines.

B. Change of Address

USCIS believes that all customers, not just those with pending or retrogressed visa cases, should be easily able to update their address. Applicants bear the legal burden to provide USCIS with their most current address within 10 days of moving.⁹ Customers may complete Form AR-11, Alien’s Change of Address Card, by mail or online.¹⁰ More specific information on how to submit a completed Form AR-11 is available at www.uscis.gov/addresschange.

⁷ USCIS Policy Memorandum, “Instructions for Handling Regressed Visa Number (Employment-Based and Family-Based) Adjustment of Status Cases Interviewed at USCIS Field Offices (Dec. 15, 2010); <http://www.uscis.gov/USCIS/Outreach/Interim%20Guidance%20for%20Comment/regressed-visa-12-15-10.pdf>.

⁸ USCIS Webpage, Visa Retrogression, <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnextoid=a294b16de4c0f210VgnVCM100000082ca60aRCRD&vgnnextchannel=aa290a5659083210VgnVCM100000082ca60aRCRD> (last updated June 14, 2011).

⁹ See 8 CFR 265.1.

¹⁰ With the exception of A and G nonimmigrants, all non-U.S. nationals present in the U.S. for more than 29 days are required to submit a paper or electronic Form AR-11 to notify USCIS that they have moved. The filing of Form AR-11, however, does *not* update the address for any pending applications or petitions. Customers with pending applications or petitions must inform USCIS of a change of address either online or through the National Customer Service Center (NCSC) at 1-800-375-5283.

In USCIS's future transformed environment, customers will enjoy a simple, real-time process to change their address via personal accounts. USCIS will consider the CISOMB's suggestion to implement a focused change of address campaign.

C. Survivor Benefits

In 2009, Congress enacted section 204(l) of the Immigration and Nationality Act (INA), which addresses relief that may be available when a qualifying relative dies before the beneficiary or derivative beneficiary is able to obtain permanent resident status.

1. Policy Memorandum

Section 204(l) gives USCIS discretion to permit an individual who meets the residence requirements of section 204(l) to immigrate despite the death of the qualifying relative. In December 2010, USCIS issued a policy memorandum advising ISOs that the discretionary decision to reinstate approval generally should be exercised favorably if section 204(l) would have supported approval of the petition and if the relative had died while it was pending.¹¹

USCIS believes that, for non-spouse immediate relative and family preference cases, 8 CFR 205.1(a)(3)(i)(C) and section 204(l) work well together. USCIS must determine in each case that permitting the individual to immigrate, despite the qualifying relative's death, is not contrary to "the public interest." If the qualifying relative dies while a visa petition is still pending, this issue can be readily addressed when adjudicating the petition. However, if the person dies after approval, there is still a need to ensure that USCIS is aware of the death and has the opportunity to address the impact of section 204(l) on the case. Automatic revocation, followed by reinstatement after a specific request that shows that the individual meets the requirements of section 204(l), ensures that USCIS has the opportunity to review the petition for eligibility to continue the immigration process under the provisions of section 204(l) (e.g., the individual meets residence requirements, warrants the favorable exercise of discretion, etc.).

2. Motion to Reopen with Fee

The CISOMB expressed concern that some survivors, whose motions to reopen with fee were dismissed because they were filed prior to the publication of the December 2010 policy memorandum, must now file a second motion to reopen with fee. Chapter 10.21(c)(8)(i) of the AFM allows an individual whose case was denied before October 28, 2009, to file an untimely motion to reopen if section 204(l) would permit approval of a still-pending petition. An individual who properly filed a motion (including an untimely motion) solely on the basis of the enactment of section 204(l) that was dismissed prior to the

¹¹ USCIS Policy Memorandum, "Approval of Petitions and Applications after the Death of the Qualifying Relative under New Section 204(l) of the Immigration and Nationality Act" (Dec. 16, 2010); www.uscis.gov/USCIS/Laws/Memoranda/2011/January/Death-of-Qualifying-Relative.pdf.

issuance of the memorandum need not file a new motion with fee.¹² Rather, the individual should indicate in a written request with supporting documentation to the deciding office why the dismissal was in error.

If, in fact, the individual did file a motion that complied with AFM 10.21(c)(8), USCIS will reopen the case and render a new decision. USCIS will make this information available on its Web site. If the CISOMB knows of specific, unresolved cases in this context, USCIS invites appropriate contact for follow-up action.

3. Case Tracking

Currently, USCIS does not track cases that are denied as a result of the death of a qualifying petitioner or beneficiary. However, individuals who believe that a case was denied in error during the period after the enactment of section 204(l) and before the issuance of the policy memorandum may make a written request to the deciding office indicating why he or she believes the decision was in error and provide any available documentation to support the claim (e.g., copies of the receipt notice, denial notice, and death certificate).¹³ If the CISOMB knows of specific, unresolved cases in this context, USCIS invites follow-up information.

4. Humanitarian Reinstatement

Certain beneficiaries may seek humanitarian reinstatement of a revoked visa petition when the relative who filed a visa petition on their behalf dies. Chapter 21.2(h)(1)(C) of the USCIS Adjudicator's Field Manual (AFM), which is available on the USCIS Web site, specifies how a reinstatement request is made and what factors are considered.

V. EMPLOYMENT

USCIS is committed to realizing the potential of current immigration laws to grow the U.S. economy and create American jobs. On August 2, 2011, USCIS announced a series of policy, operational, and outreach efforts to fuel the nation's economy and stimulate investment. These efforts include:

- Publishing information on the availability of National Interest Waivers for certain EB-2 immigrant entrepreneurs;
- Clarifying the eligibility of entrepreneurs with an ownership stake in their own companies, including sole employees, for H-1B visas;
- Implementing the first of several fundamental enhancements to the EB-5 program proposed in May;

¹² If new evidence is being presented, the beneficiary and/or counsel should file a motion to reopen with the required fee.

¹³ USCIS Policy Memorandum, "Approval of Petitions and Applications after the Death of the Qualifying Relative under New Section 204(l) of the Immigration and Nationality Act" (Dec. 16, 2010); www.uscis.gov/USCIS/Laws/Memoranda/2011/January/Death-of-Qualifying-Relative.pdf.

- Expanding [Premium Processing Service](#) to immigrant petitions for multinational executives and managers; and
- Engaging entrepreneurs as core stakeholders in the global economy.

USCIS has since implemented the first of several fundamental enhancements to the EB-5 program, discussed further below. Moreover, USCIS hosted an entrepreneur-focused engagement on August 11, 2011, which helped USCIS gain a better understanding of the unique circumstances of entrepreneurs and startup companies. USCIS also launched Conversations with the Director, a new series of small group meetings with Director Mayorkas to discuss immigration issues important to stakeholders. Between September 2011 and April 2012, Director Mayorkas hosted three meetings devoted to the EB-5 program and economic development.

On October 11, 2011, Director Mayorkas joined the President's Council on Jobs and Competitiveness to announce a new initiative called Entrepreneurs in Residence (EIR). Through this innovative initiative, USCIS has brought together a Tactical Team comprised of business experts who are working alongside USCIS experts to optimize a range of existing visa categories used by entrepreneurs to provide immigrant pathways that are clear, consistent, and aligned with business realities. By harnessing industry expertise from the public and private sectors, this initiative aims to increase the job creation potential of employment-based and high-skilled visa categories. In February 2012, USCIS launched EIR with an Information Summit in Moffett Field, California, where stakeholders provided their strategic thinking on USCIS policies and practices related to immigrant entrepreneurs. The Information Summit informed the work of the Tactical Team as they developed a 90-day project plan to address the challenges raised by stakeholders among the business community. Since the Information Summit, the EIR Tactical Team has been working to assess the following nonimmigrant visa classifications and, consistent with existing immigration law, develop enhancements where necessary: B-1, Temporary Visitors for Business; H-1B, Specialty Occupations; E-1, Treaty Traders; E-2, Treaty Investors; L-1, Intracompany Transferees; and O-1, Extraordinary Ability.

USCIS will continue to work to foster economic growth and global competitiveness by strengthening the employment-based immigration system.

A. VIBE

The Validation Instrument for Business Enterprises (VIBE) is a tool designed to enhance USCIS adjudication of certain employment-based immigration petitions. VIBE uses commercially available data from an independent information provider (IIP) to validate basic information about companies or organizations petitioning to employ alien workers. Currently, the independent information provider for VIBE is Dun & Bradstreet (D&B). The D&B database is updated monthly. Although it can take 30 to 60 days for updated information to be reflected in VIBE, a technical enhancement to the VIBE system allows USCIS to relay information received in response to a VIBE-related Request for Evidence (RFE) to ISOs at all Service Centers on a more frequent basis. As a result, ISOs may have access to more current information even if the D&B database has yet to be updated.

1. Accommodation Addresses

As noted in the Annual Report, a petitioner who uses an accommodation address (e.g., the address of an attorney, representative, or other agent) may have a harder time obtaining a proper match in VIBE. While VIBE automatically runs the name and address listed on a petition, the system also provides ISOs with the capability to conduct searches using different names and/or addresses for a petitioner if such information appears on the petition or in supporting documentation. ISOs were made aware of this capability in training and written guidance materials.

2. VIBE-Related RFEs

USCIS received public feedback expressing confusion over whether a petitioner was required by USCIS to contact D&B directly if it receives a VIBE-related RFE. To clarify that issue, in July 2011, USCIS revised the information about VIBE on the USCIS Web site at www.uscis.gov/vibe and in its RFE language. The revised language explains that USCIS does not require a petitioner to contact D&B or update its file with D&B in order to overcome a VIBE-related issue addressed in an RFE. When responding to an RFE, the petitioner is required to submit the requested additional documentation only to USCIS to establish eligibility.

USCIS is aware that D&B representatives may suggest during these processes that the company or organization purchase D&B products or services. USCIS does not in any way suggest that petitioners should pay any fee to expedite the creation of a new record or the updating of an existing record with D&B. As noted by the CISOMB, USCIS is working with D&B to continue to address these marketing concerns.

B. EB-5 Immigrant Investor Program

USCIS recognizes that the EB-5 Immigrant Investor Program promotes our nation's economic growth and acknowledges that the regulations governing the program need to be updated.¹⁴ USCIS is reviewing current EB-5 regulations to identify areas that should be revised within the Regional Center program such as oversight of designated Regional Centers, improving general efficiency within the Regional Center program with the goal of increasing use by foreign investors, and acceptable methodologies for demonstrating estimated job creation. USCIS is also examining more granular issues within the presently complex EB-5 program with an eye toward simplification to the extent possible. Once definitive timelines are established, USCIS will apprise stakeholders and the CISOMB, and any such rulemaking will be included in the Unified Agenda of Federal Regulations.

In the meantime, USCIS is working to consolidate its various EB-5 policy memoranda into a single policy memorandum, which will incorporate constructive stakeholder input and reflect what has been learned since the various memoranda were initially promulgated. Given the number and complexity of issues involved, USCIS is developing this EB-5 policy

¹⁴ See 8 CFR 204.6 and 8 CFR 216.6.

memorandum in iterative fashion, seeking public comment as the draft policy memorandum progresses. USCIS has issued two draft memoranda for public comment to address certain foundational issues in the EB-5 Program, including issues raised in the Annual Report such as targeted employment area determinations and material change.¹⁵

USCIS is also enhancing the EB-5 immigrant investor program by transforming the intake and review process. As noted in the Annual Report, on May 19, 2011, USCIS proposed fundamental enhancements to streamline the EB-5 process which include implementing direct lines of communication between the applicants and USCIS, and providing applicants with the opportunity for an interview before a USCIS panel of experts to resolve outstanding issues in an application.¹⁶

On September 13, 2011, USCIS implemented the first of these enhancements – direct email communication between EB-5 Regional Center applicants and ISOs.¹⁷ USCIS has also retained business analysts to support its adjudicators and has selected two full-time economists to bolster its expertise. USCIS retained an outside consultant to help further reengineer the EB-5 adjudication process to deliver greater efficiencies.

1. Regional Center Attorneys

The CISOMB raised concerns from stakeholders that, in some instances, regional centers may be in a better position than the investor to respond to an RFE or a NOID at the Form I-526 stage. As such, stakeholders questioned why regional center attorneys are not notified when issues about the underlying regional center proposal arise.

Section 204(a)(1)(H) of the INA provides that any “alien” desiring to be classified as an EB-5 alien may file a Form I-526. Consequently, the alien investor is the sole party in interest in the petition before USCIS. Although the regional centers have an indirect interest in the adjudication of the petition, there may be circumstances in which the regional centers and the alien investors have divergent interests. Furthermore, alien investors and the regional centers have a contractual relationship to which USCIS is not a party. Finally, nothing precludes alien investors from communicating and collaborating, either independently or collectively, with the regional centers on responses to RFEs. Accordingly, rather than potentially interfere with a contractual relationship or possibly be forced to

¹⁵ USCIS Policy Memorandum, “EB-5 Adjudication Policy” (Nov. 9, 2011); http://www.uscis.gov/USCIS/Outreach/Feedback%20Opportunities/Draft%20Memorandum%20for%20Comment/EB_5_Adjudications_Policy3.pdf.

¹⁶ “USCIS Proposes Significant Enhancements to EB-5 Visa Processing to Help America Win the Future” (May 19, 2011); <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543fd1a/?vgnnextchannel=68439c7755cb9010VgnVCM10000045f3d6a1RCRD&vgnextoid=a4b57b52e5800310VgnVCM100000082ca60aRCRD>.

¹⁷ “Direct Email Communication with EB-5 Regional Center Applicants Questions and Answers” (Sept. 13, 2011); <http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543fd1a/?vgnnextoid=efccf0aec9262310VgnVCM100000082ca60aRCRD&vgnnextchannel=6abe6d26d17df110VgnVCM1000004718190aRCRD>.

consider conflicting responses to RFEs, USCIS will only communicate with the actual party in interest in the petition or his or her representative as identified on a properly executed Form G-28.

C. RFEs

In April 2010, USCIS launched the RFE Project. This initiative engages stakeholders in the review and revision of RFE templates to ensure that they are consistent, relevant to the classification, adaptable to the facts and needs of a case, clear, and concise. USCIS has already posted several templates for public comment on its Web site and will continue to develop others for stakeholder review.

1. RFE Review

The CISOMB noted stakeholder concerns regarding the issuance of RFEs, including lack of consistency among offices and requests for information previously provided with the filing. In last year's Annual Report, the CISOMB suggested that USCIS conduct a 100-percent supervisory review for certain product lines to help identify and address perceived issues. While USCIS does not require supervisory review for all RFEs, offices do conduct more extensive reviews of RFEs when there is new policy for ISOs to follow. For example, from February to August 2010, USCIS's Service Center Operations Directorate (SCOPS) implemented a 100-percent supervisory review of all RFEs related to the policy contained in the January 2010 H-1B employer-employee policy memorandum.¹⁸ When ISOs are trained in new classifications, their work, including any RFEs that they issue, is reviewed by a senior-level ISO and/or a supervisor prior to issuance. USCIS also has an extensive quality review program, which evaluates the reasons for issuing the RFEs.

As noted above, USCIS initiated its RFE Project with the goal of creating a more consistent and streamlined approach to RFE issuance. In addition to the review and revision of RFE templates, the project is focusing on the development of a more uniform standard for how ISOs are to determine whether evidentiary support of an application or petition is sufficient. Training accompanies each new template as it is cleared for use, and the Agency provides training on the "preponderance of the evidence" standard, evidentiary weight, and use of the new template. USCIS has also established an e-mail address for stakeholders to send examples of RFEs that they believe are inconsistent with an RFE template.¹⁹

2. RFE Templates for Hs and Ls

As discussed above, USCIS is reviewing its RFE templates as part of the ongoing RFE Project. The project began with the posting of several employment-based benefit RFE templates for the P and Q nonimmigrant categories, as well as the EB-1 immigrant classification. In January, USCIS posted for public comment four RFE templates for the

¹⁸ USCIS Policy Memorandum, "Determining Employer-Employee Relationship for Adjudication of H-1B Petitions, Including Third-Party Site Placements" (Jan. 8, 2010); <http://www.uscis.gov/USCIS/Laws/Memoranda/2010/H1B%20Employer-Employee%20Memo010810.pdf>.

¹⁹ Stakeholders may e-mail USCIS at scopsrfe@dhs.gov. USCIS will look into the alleged inconsistency but will not respond directly to the stakeholder.

L-1 nonimmigrant classification. While RFE templates for H nonimmigrants have not yet been posted, USCIS Headquarters has worked with the Service Centers on the RFEs for this classification. For example, when the January 2010 H-1B employer-employee relationship policy memorandum was issued, USCIS Headquarters personnel conducted related training at the Service Centers. SCOPS worked with the Service Centers to create RFE templates that addressed the issues covered in the memorandum and required provisional 100-percent supervisory review of RFEs. SCOPS regularly conducts roundtables with the Service Centers to discuss issues within these classifications to ensure consistency and to determine where USCIS may need additional training and materials.

3. Leader for RFE Project

In the Annual Report, the CISOMB suggested that it may be beneficial to have an Agency-wide lead for the RFE Project. Rather than an individual lead, the RFE Project is led by a team consisting of several offices including SCOPS, the Office of the Chief Counsel, the OP&S, and OPE. Considering the specific, immigration benefit expertise required for the related template-review and associated training, the USCIS office lead changes depending on the benefit classifications being addressed. Presently, SCOPS serves as the project lead since the classifications currently being addressed are adjudicated at the Service Centers. When classifications or form-types which are worked by another Directorate are included in the RFE Project, that Directorate will become the lead for the RFE Project. While the lead may switch depending on the classification or form-type, USCIS senior leadership has an active presence in the RFE Project. Leadership is kept apprised of the work being accomplished and provides significant input as to the classifications addressed in each phase.

4. RFE Rates

Several factors have influenced the RFE rates for the H and L classifications in FY 2010, including, but not limited to, the Troubled Asset Relief Program (for the H-1B classification only; this provision expired in February 2011) and the implementation of Public Law 111-230 (for both H-1B and L-1 petitions). USCIS acknowledges the need for additional materials and training for the Service Centers on the L classification and has conducted stakeholder conferences and working groups on this topic. As discussed below, USCIS has provided training for ISOs who adjudicate L-1B nonimmigrant petitions. While the H-1B RFE rates dropped between FY 2009 and FY 2010, USCIS will continue to monitor the RFE rates for H-1Bs and other benefit classifications.

D. L-1B Nonimmigrants

USCIS continually works to ensure consistent adjudication of petitions filed by businesses requesting L-1B nonimmigrant intracompany transferees with specialized knowledge. As noted in the Annual Report, in May 2011, USCIS held a stakeholder teleconference on the L-1 nonimmigrant classification, specifically on issues pertaining to “specialized knowledge.” On October 12, 2011, USCIS provided training to both the California Service Center (CSC) and the VSC covering topics such as “specialized knowledge” and the evidentiary requirements related to determining L-1B eligibility. The training also provided an overview on preparing clear and concise RFEs for L-1B petitions.

E. E-Verify

USCIS appreciates the CISOMB's recognition of the continuing efforts to improve the E-Verify program. In addition to those accomplishments noted in the Annual Report, USCIS would like to highlight the following achievements and activities for the past fiscal year:

- American Customer Satisfaction Index Survey (ACSI): In October 2010, the E-Verify Program received a score of 82 out of 100 on the ACSI, which is well above the overall satisfaction score of 69 for the Federal Government. The highest rated aspects of E-Verify were: the speed of initial response (score of 93), customer support (score of 89), and ease of using E-Verify (score of 88). Other key findings of the survey revealed that the overwhelming majority of users were likely to recommend E-Verify to other employers and were likely to continue using the program – a testament to E-Verify's usability and efficiency.
- Nebraska Verification Operations Center (NVOC): In February 2011, USCIS expanded its field presence by opening a second verification operations facility in Lincoln, Nebraska. NVOC is dedicated to monitoring and compliance efforts, secondary verifications, and customer support operations.
- E-Verify Self Check: In March 2011, USCIS launched E-Verify Self Check, an innovative service that allows individuals to verify their work authorization status online and to proactively resolve records mismatches before formally seeking employment. The Self Check service, which is available in English and Spanish, is now available in all 50 states, Washington, D.C., Guam, Puerto Rico, the U.S. Virgin Islands and the Commonwealth of Northern Mariana Islands.
- E-Verify Spanish Web Site: In May 2011, USCIS launched an E-Verify Spanish Web site. The E-Verify Spanish Web site provides the Spanish-speaking community with an authoritative source of information about its rights and responsibilities in relation to the E-Verify program.
- Records and Information from DMVs for E-Verify (RIDE): In June 2011, USCIS collaborated with the State of Mississippi to deploy RIDE – an initiative that allows E-Verify to check the authenticity and validity of driver's licenses presented by employees.
- Ease-of-Use Enhancements: In June 2011, USCIS made several customer focused enhancements to E-Verify. The enhancements include added help text that provides quick answers to users' questions and password selection guidelines. The new enhancements have also streamlined the enrollment and user registration process.
- Monitoring and Compliance (M&C) Program: USCIS has conducted more than 26,000 compliance activities (letters, telephone calls, and e-mails) through July of FY 2011. USCIS plans to complete 24 site visits with federal E-Verify employers by the end of FY 2011. The purpose of the site visits is to increase the visibility of the M&C program in the employer community and to help further improve and increase the Agency's compliance assistance.

VI. INTERAGENCY COORDINATION

USCIS actively coordinates and regularly meets with other agencies and Departments, such as the Department of Defense (DoD), Immigration and Customs Enforcement (ICE), and the Executive Office for Immigration Review (EOIR), to ensure the effective processing of immigration benefits and resolution of interagency issues.

A. Military Members and Their Families

USCIS is committed to serving military members and their families and recognizes that consistent communication and liaison efforts are critical to this mission. Field offices and Service Centers continue to work diligently to establish and maintain effective coordination with DoD and its components. USCIS promotes effective coordination through regular outreach visits to military installations. The Agency proudly expanded upon these efforts by opening its first sub-office on a military base at Ft. Jackson, South Carolina, in June 2011.

Since 2008, USCIS has hosted quarterly meetings with DoD to discuss best practices, resolve issues, and promote open dialogue and effective communication. The meeting is comprised of representatives from the Office of the Secretary of Defense, all military service branches, and several USCIS Headquarters offices. In 2009, the team was awarded the USCIS Director's Partnership Award for Effective Interagency Cooperation.

USCIS continues to enhance and refine outreach efforts to service members and their spouses and children. USCIS has expanded outreach initiatives and considerably improved communication with many military commands. USCIS has completed over 45,000 immigration services-related activities on military installations since late 2008. Over 670 military members in basic training have naturalized thus far in FY 2012 as a result of this initiative. USCIS continues to work to establish permanent high-level points of contact from the individual service branches to facilitate the coordination of military immigration matters and events. These points of contact would provide USCIS with greater access to appropriate leadership to coordinate with regarding various initiatives and outreach events.

USCIS has worked to develop a network of connections with each of the military branches. USCIS has established meaningful relationships with the Judge Advocate General (JAG) on many military installations to coordinate regarding immigration concerns. Some military branches place the function of USCIS liaison with alternate offices, such as the Army Community Services, Relocation Assistance Program Offices, and others. In these cases, USCIS works directly with those offices, rather than with the JAG.

B. Individuals in Removal Proceedings

On February 4, 2011, USCIS provided a policy memorandum for coordination with ICE on adjudicating applications and petitions involving individuals in removal proceedings before

EOIR.²⁰ The policy memorandum created a national standard that provides specific timeframes for adjudication to which all local offices must adhere. The policy memorandum instructed district offices to contact their local counterparts in ICE to develop Standard Operating Procedures (SOPs) consistent with the procedures policy memorandum. The SOPs help facilitate the national policy with the ultimate aim of assisting EOIR achieve greater docket efficiency.

Although the CISOMB noted stakeholder concerns about consistency, locally-developed SOPs are necessary because offices vary in size and resources, and USCIS offices are not always co-located with ICE. This flexibility allows offices to establish the most efficient exchange of files and information between the two agencies.

VII. CUSTOMER SERVICE

As discussed in the CISOMB Annual Report, USCIS has made significant improvements in customer service. At the National Customer Service Center (NCSC), which receives approximately 12 million calls per year, USCIS streamlined the Interactive Voice Response (IVR) system to remove confusing language, eliminated “dead end” scenarios, and improved the availability of live assistance. USCIS implemented a technical solution that minimizes the amount of information callers must repeat each time they are transferred within the NCSC. As a result of these improvements, USCIS has seen decreased wait times at the Call Centers.

In addition to these improvements, USCIS issued a Request for Quotations (RFQ) to competitively acquire the services of a contractor to develop the most effective and realistic future-state design for our customer service delivery model. The RFQ emphasized the need for a customer service model and implementation plan that facilitate improvements and clearly address the complete USCIS customer service spectrum, including changes in customer interactions based on the implementation of the USCIS Electronic Immigration System (ELIS) and other technologies. The contract was awarded on April 25, 2012, and the contractor’s first recommendations are due to USCIS by October 9, 2012.

A. Interactive Voice Response (IVR)

In the response to last year’s Annual Report, USCIS committed to take specific steps to address stakeholder concerns regarding the NCSC. USCIS is pleased to report that it completed the final step when it deployed updates to the IVR. The changes simplify the overall structure of the IVR by shortening menus and improving ease of navigation. USCIS reorganized menu options based on historical call volumes, eliminated confusing sub-menus, and increased live assistance accessibility. USCIS reviewed all content in the IVR and replaced confusing terminology with plain language. The redesigned IVR improves the customer’s experience by reducing the amount of time customers will spend navigating within the system to obtain information, seek live assistance, or check case status.

²⁰ USCIS Policy Memorandum, “Guidance for Coordinating the Adjudication of Applications and Petitions Involving Individuals in Removal Proceedings” (Feb. 4, 2011); <http://www.uscis.gov/USCIS/Laws/Memoranda/2011/April/guidance-adjudication-remove-proceedings.pdf>.

B. Scripted Information

In FY 2011, the Customer Service Representatives at Tier 1²¹ responded to 4,747,853 calls, utilizing the scripted information provided by the USCIS Customer Service Directorate (CSD).²² While USCIS acknowledges that there is always room for improved service, USCIS has received favorable feedback from stakeholders. Internal surveys reveal that 81 percent of surveyed callers were either extremely satisfied (56.3 percent) or mostly satisfied (24.3 percent) with their Call Center experience.

USCIS encourages the CISOMB to contact the CSD regarding any caller not satisfied with the service provided at the Call Centers. CSD will retrieve and evaluate the respective call records and take appropriate corrective action.

C. Service Requests

When NCSC personnel are unable to resolve a customer's inquiry, USCIS transfers the inquiry to the USCIS office best able to assist with the issue and respond to the customer. To track and facilitate this transfer, USCIS uses an electronic inquiry system called the Service Request Management Tool (SRMT). Since the introduction of the SRMT, USCIS has reduced the average response time and maintained shorter timeframes for expedited requests.

USCIS continues to strive to improve the quality of its responses to service requests submitted via the NCSC or online. USCIS is examining this issue as part of its policy review initiative and its management labor forum, and it is in the process of developing policy that addresses responsiveness, accuracy, and timeliness of the service request responses.

VIII. TRANSFORMATION

Transformation is an initiative to move USCIS from a paper-based business model to an electronic account-based system with improved technologies and redesigned business processes. The Transformation initiative is a multi-year project involving several releases. While much work lies ahead, USCIS was pleased to announce the initial release of the USCIS Electronic Immigration System (ELIS), the Agency's new online case management system, on May 22, 2012.

²¹ Tier 1 Call Centers are contractor-run organizations that operate from scripts provided by USCIS. Tier 1 addresses general immigration questions, such as: what are the qualifying criteria for a benefit, how to change an address, how recent changes to laws and regulations affect them, how to appeal a denied case, etc. Tier 1 representatives do not have access to USCIS systems (CLAIMS, CIS, etc.), although they do have the ability to initiate a Service Request through the Service Request Management Tool (SRMT). If Tier 1 is not able to address a concern, the call is routed to Tier 2. Tier 2 is staffed with ISOs who have access to most USCIS systems and can address individual concerns about the status of an applicant's cases, specific questions about eligibility, and delivery of travel or employment documents.

²² On May 7, 2012, USCIS realigned its organizational structure and CSD was incorporated into the newly-created Customer Service and Public Engagement (CSPE) Directorate.

A. Accessibility for Non-Computer Users

The first benefit request available for e-filing in the transformed environment is Form I-539, Application to Extend/Change Nonimmigrant Status. This release includes requests for extension of stay in the B, F-1 (with date-specific visas), and M nonimmigrant classifications; change of status to the B, F, J, and M nonimmigrant classifications; and reinstatement of status in the F and M nonimmigrant classifications. Since these classifications represent students, scholars, and visitors for business or pleasure, USCIS does not believe significant numbers of these applicants are non-computer users. USCIS has also convened several stakeholder engagement sessions to discuss the demographics of the individuals who may file applications after the initial release. USCIS anticipates mandating electronic filing of this benefit type only after first acquiring experience with voluntary e-filing in the transformed environment. Moreover, until USCIS mandates e-filing of this benefit type, applicants will continue to have the option of filing paper forms.

Going forward, as USCIS transitions benefit types to the transformed environment, each benefit type will be analyzed to determine whether and when an e-filing mandate will be appropriate. USCIS may consider the following information when conducting this analysis: benefit request characteristics (i.e., complexity of the request and/or supporting documentation), application volumes, demographic characteristics of applicants, and public comments gathered through listening sessions, engagements, and *Federal Register* notices.

B. Immigration Practitioners

In a future release, USCIS will develop functionality in USCIS ELIS to enable immigration practitioners to securely submit benefit requests electronically through External Data Interface Standards (EDIS). EDIS represents a set of technical standards that will enable third-party immigration practitioners' systems to securely exchange electronic data directly with USCIS. Many legal representatives and attorneys have indicated that filing online will be simpler for them with the addition of EDIS.

C. Managing Changes

The CISOMB and USCIS recognize that Transformation will change not only the customer's experience but also the entire adjudication process. One stakeholder concern is that ISOs may still request hard copies of documents when adjudicating applications and petitions, despite the move from a paper-based to an electronic environment. USCIS understands this concern and is working to support process changes within its workforce operations.

Key activities to anticipate and address issues that may arise from Transformation include creating a network of Transformation advocates within the workforce at the local field level; generating leadership support for cultural modifications through advocacy with their staff; and involving USCIS employees on process design teams and other initiatives. These activities will be adjusted over the lifecycle of Transformation to match evolving business

practices as the system functionality is deployed to larger internal and external stakeholder communities.

IX. CONCLUSION

Transparency and transformation are overarching themes that have been the focus of USCIS efforts and will carry the Agency through FY 2012. USCIS appreciates the insight provided by the CISOMB in this year's Annual Report and looks forward to the CISOMB feedback as the Agency takes its first public-facing steps towards a transformed environment.

X. APPENDIX A: PRIOR RECOMMENDATIONS

During the 2009 and 2010 reporting periods, the CISOMB issued 38 recommendations. USCIS agreed to implement 19 recommendations in whole and 11 recommendations in part and indicated that it would consider two other recommendations. USCIS declined to implement six recommendations.

Of the 19 recommendations that USCIS agreed to implement in whole, 12 have been successfully implemented and seven remain pending. Of the 11 recommendations that USCIS agreed to implement in part, nine have been successfully implemented while two remain pending.

Note: In the chart below, USCIS uses “In Part” in two instances: 1) USCIS agrees with some but not all of a multi-part recommendation, and 2) USCIS agrees with the basis for the recommendation but identifies a different mechanism to address the issue.

The “status” of the recommendation only refers to what USCIS agreed to implement. For instance, if USCIS agreed to implement a recommendation in part and has fully implemented that part, the status box will be shaded green.

Legend	
Agree to Implement	Status
Yes	Implemented
In Part	Not Fully Implemented
No	Not Applicable (N/A)
Will Consider	Pending Review

Recommendation	Agree to Implement	Status
Request for Evidence (RFE) Recommendations (June 30, 2010)		
Preponderance of the Evidence Training (AR2010-01)	Yes	Pending
Improve Detail and Facts in RFEs (AR2010-02)	Yes	RFE Project launched April 2010
Specify Adjudicatory Standards for L-1B Petitions (AR2010-03)	In Part	Drafting policy memorandum
Supervisory RFE Reviews (AR2010-04)	No: <i>Time-consuming and resource-intensive; would increase processing times</i>	N/A
National Customer Service Center Recommendations (June 30, 2010)		
Live Representative Option for Interactive Voice Response (IVR) (AR2010-05)	No: <i>Use of IVR common customer service practice; new IVR set for</i>	N/A

	<i>release end of FY 2011</i>	
Develop an Immediate Connection Option for Call Center Inquiries (AR2010-06)	In Part	New IVR routes customer inquiries directly to Tier 1 or Tier 2 for specific inquiry types
Eliminate IVR Scripts (AR2010-07)	No: <i>Scripted information common practice in call center industry</i>	N/A
Designate Field Office POCs for Call Center Supervisors (AR2010-08)	In Part	POCs are in place
Identify and Resolve Customer/Stakeholder Call Center Issues (AR2010-09)	Yes	Regular meetings with Call Centers to identify issues
Immigration Services for Military Families (June 30, 2010)		
Allow Military Families to Keep Files with Original Office (AR2010-10)	In Part	To the extent possible, USCIS will accommodate
Agency Coordination within the Removal Process (June 30, 2010)		
Public Guidance for Agency Responsibility within Removal Process (AR2010-11)	Yes	Drafting policy memorandum
Form N-648, Medical Waivers (June 30, 2010)		
Establish a POC for Field Offices Adjudicating Form N-648 (AR2010-12)	No: <i>POCs are to assist ISOs; USCIS will still work to address stakeholder concerns</i>	N/A
Provide Public Guidance for Completing Form N-648 (AR2010-13)	In Part	Training for all stakeholders was posted to the USCIS website.
Medical Experts Review of Form N-648 (AR2010-14)	No: <i>Cost prohibitive</i>	N/A
Create a Data Collection and Tracking System for Forms N-648 (AR2010-15)	Yes	Will be part of Transformation
Form I-824, Duplicate Approval Notices (June 30, 2010)		
Modify Processing Guidelines for Form I-824 (AR2010-16)	Yes	I-824s are prioritized; sometimes the A-file is needed, which may cause delays
Transfer Form I-824 to the Underlying Pending Case File (AR2010-17)	In Part	Cannot be done in all instances
Issue SOP and Training for Adjudicating Form I-824 (AR2010-18)	Yes	SOP was issued June 2011
Secure Delivery of Approval Notifications to DOS (AR2010-19)	No: <i>Logistical issues and operational costs</i>	N/A
Develop Electronic Communications Between USCIS and DOS (AR2010-20)	Will Consider	USCIS exploring feasibility
Revising Form I-601 Processing (June 10, 2010)		
Centralize Processing of Form I-601 (FR2010-45:1)	In Part	Waivers for applicants outside the U.S. will be filed at the Lockbox and adjudicated at the NSC
Permit Concurrent Filing of Forms I-601 and I-130 (FR2010-45:2)	Will Consider	Review ongoing
Develop an Overseas Case Management System for Forms I-601 (FR2010-45:3)	Yes	Case management system

		implemented; working to provide processing times and case status online
Publish Policy Memorandum on Expedite Requests for Forms I-601 (FR2010-45:4)	Yes	Policy memorandum posted to USCIS Web site
Increase Coordination between DOS and USCIS in Ciudad Juarez (FR2010-45:5)	Yes	DOS and USCIS communicate daily
Digitize A-Files for Cases Pending at Ciudad Juarez (FR2010-45:6)	In Part	USCIS addressed issue that served as basis for recommendation
Policy Memorandum and Processing Emergent Refugee Cases (April 14, 2010)		
Publicize Criteria for Expediting Emergent Refugee Cases (FR2010-44:1)	Yes	Draft guidance is being reviewed
State the Reason for Denying a Refugee Application (FR2010-44:2)	In Part	Security issues prohibit USCIS from providing all reasons for the denial. Ongoing training provided to ISOs
Issue Policy Memorandum on Filing a Request for Review (FR2010-44:3)	Yes	Policy memorandum posted to USCIS Web site
Implement a Receipt Procedure for Request for Review Filings (FR2010-44:4)	Yes	In May 2011, USCIS began issuing RFR receipt notices
Management of A-Files (June 30, 2009)		
Digitization of Immigration Files (AR2009-01)	Yes	Established permanent site to digitize paper files
A-File Tracking Protocol (AR2009-02)	Yes (Initially Agreed In Part)	In April 2010, introduced an updated chapter in Records Handbook on "Lost Files." Established new branch to train, evaluate, and monitor the maintenance of immigration records
Tri-Bureau Working Group Training (AR2009-03)	Yes	All USCIS, ICE, and CBP offices continue to receive the appropriate training
Employment-based (June 30, 2009)		
Processing Methods for AC21 Portability Provisions (AR2009-04)	In Part	Similar processes are in place at TSC and NSC
EB-1 Tip-sheet (AR2009-05)	Yes	Policy memorandum posted to USCIS Web site
DNA Testing Updates (June 30, 2009)		
Update the AFM to Reflect a Preference for DNA Testing (AR2009-06)	Yes	Ongoing internal discussions
Coordinate with DOS Regarding DNA Testing Procedures (AR2009-07)	In Part	USCIS continues to coordinate with DOS; an MOU was not deemed necessary
Designate a DNA Liaison to Facilitate Coordination with DOS (AR2009-08)	Yes	Pending

XI. APPENDIX B: ACRONYMS AND INITIALISMS

ACSI	American Customer Satisfaction Index
AFM	Adjudicator's Field Manual
CBO	Community-Based Organization
CFR	Code of Federal Regulations
CISOMB	CIS Ombudsman
CPR	Conditional Permanent Resident
CSC	California Service Center
CSD	Customer Services Directorate
CSPE	Customer Service and Public Engagement Directorate
CSR	Customer Service Representative
D&B	Dun and Bradstreet
DoD	Department of Defense
DOS	Department of State
EDIS	External Data Interface Standards
ELIS	Electronic Immigration System
EOIR	Executive Office for Immigration Review
FY	Fiscal Year
HCT	Human Capital and Training
ICE	Immigration and Customs Enforcement
IIP	Independent Information Provider
INA	Immigration and Nationality Act
INS	Immigration and Naturalization Service
ISO	Immigration Services Officer
IVR	Interactive Voice Response
JAG	Judge Advocate General
M&C	Monitoring and Compliance
NBC	National Benefits Center
NCSC	National Customer Service Center
NOID	Notice of Intent to Deny
NSC	Nebraska Service Center
NVOC	Nebraska Verification Operations Center

OP&S	Office of Policy and Strategy
OPE	Office of Public Engagement
RFE	Request for Evidence
RIDE	Records and Information from DMVs for E-Verify
SCOPS	Service Center Operations Directorate
SOP	Standard Operating Procedure
SSI	Supplemental Security Income
TARP	Troubled Asset Relief Program
TEA	Targeted Employment Area
TSC	Texas Service Center
TVPRA 2008	Trafficking Victims Protection Reauthorization Act of 2008
UPIL	Unauthorized Practice of Immigration Law
USCIS	U.S. Citizenship and Immigration Services
VAWA	Violence Against Women Act
VIBE	Validation Instrument for Business Enterprises
VSC	Vermont Service Center