

Moderator: Jim Brailer (Johns Hopkins University). Panelists: Kathy Lotspeich (USCIS, Verification Division), Matthew Emrich (USCIS, Fraud Detection and National Security Directorate)

Jim Brailer: I want to introduce the panelists. To my left, we have Matthew Emrich. He's the Associate Director of the Fraud Detection and National Security Directorate of the US Citizenship and Immigration Services. Next to Matt, we have Kathy Lotspeich. She is the Deputy Chief of the Verification Division, also at USCIS. So please join me in welcoming our panel members.

So we've prepared some questions that we should have plenty of time to get through and I'd like to offer the members of the audience a chance to ask some questions toward the end. So without further ado, let's go ahead and get started. And I did warn the panelists. I don't know how many people were here last year. These chairs are absolutely awful, which is why I asked for a podium. Yeah, I promised myself to do Six-minute Abs after the last symposium. That didn't happen so I have the podium. So hopefully, you guys can stand the torture for one hour.

So, Matt, if you could start off, just give us a brief description of the scope of your agency authority, what you do at your agency and then any relevant personal background you would like to add to that.

Matthew Emrich: Sure. So I have been the Associate Director for Fraud Detection National Security since November of 2015 and before that, I was the Deputy of FDNS for three years. So USCIS, as you I know, administers the nation's lawful immigration system. So within USCIS, FDNS is the component which identifies threats to national security and public safety posed by those seeking immigration benefits. FDNS also detects, deters and investigates immigration benefit fraud. And FDNS is also the primary conduit to other law enforcement and government agencies for information sharing. So FDNS has a sizeable headquarters component. It also has officers in the field in field operations across the United States in all CIS offices, has limited number of position overseas and also has positions at the service centers where things are adjudicated. So FDNS currently has 1,548 authorized positions.

So a little bit about authorities, CIS's authorities derive from the Immigration and Nationality Act and a Homeland Security designation. CIS has authority to investigate alleged civil and criminal violations of immigration law, interrogate aliens, issue subpoenas, administer oaths, take and consider evidence and fingerprint and photograph aliens. I began my federal employment prior to CIS in 1997 with the Immigration and Naturalization Service as a criminal investigator. I did that after serving eight years in the Marine Corps and that's it for now.

Thank you, Matt. Kathy, could you give us little bit of a background on your agency, scope and any other detail?

Kathy Lotspeich: So I'm the Deputy Chief for the Verification Division at US Citizenship and Immigration Services. We oversee three programs. We oversee the eVerify program. We also oversee the Form I-9. Not really sure if that's a program, per se, but we oversee the form and the all the guidance with the form. However, the enforcement of the form belongs to ICE. And eVerify and Form I-9, obviously, are very interrelated. So that's a large part of what we do. We also oversee a program called SAVE, which is an acronym, which I think they backed into when they developed it in 1986 because they were thinking about save money and it stands for Systematic Alien Verification for Entitlements, the SAVE program. And that program is used by about a thousand federal, state and local agencies to verify an individual's immigration status who's applying for a benefit. So our largest users of SAVE are the Social Security Administration, which validates that someone's work authorized in order to issue a Social Security Number and also healthcare.gov or Obama care. A lot of the people who are signing up for that come over to us to make sure that they're authorized to be in the United States and they're in the right category.

We also are used by a lot of DMVs, Medicaid, food stamps, TANF, those types of benefits. And eVerify and SAVE, the reason that we're in the same division is that we work off the same IT system. So we manage a very large IT system that goes and validates immigration data across not just USCIS but all of DHS. We also check Social Security Administration data as well as the Department of State and some state and local DMVs. Our division is authorized at about 600 people and we have 3 field sites in addition to a headquarters presence. We have a site in Buffalo, New York, site in Lincoln, Nebraska and a site in Los Angeles with a really tiny satellite office in San Francisco, which about five or six people but they have the most amazing office space I've ever seen because they can see the Golden Gate Bridge and I really need to get transferred to that one. We're large in that we have our – it's kind of nice, within USCIS, at least on the eVerify side, we have our own funding. We're appropriated, unlike most of USCIS, which gets its money from the fees that immigrants pay for benefits and services. And we have our own call center. We have a status verification operation where if someone doesn't clear eVerify or SAVE right away, we're able to research their case. We also have a monitoring unit, which I'll talk a little bit about and we have an outreach unit, as well as policy and IT functions within our division.

For myself, I've been with the Agency since 2004. I started off in the Office of Citizenship doing citizenship outreach as well as working on the redesign of the citizenship exam. Then I moved over to eVerify in 2006. We started about – there about 25 of us in the office. Now I said we're authorized at 600. So I sometimes feel like I work for an IT internet startup. Yeah, kind of like that. And for myself, I guess I've been sort of infatuated with immigration since I started graduate school in 2000. I went to Johns Hopkins, which our moderator works there. And prior to that, I worked briefly, about four years at the Urban Institute in their immigration studies program doing research on immigrant integration. I worked on the Center on Budget and Policy Priorities looking at food stamps and public benefit access following welfare reform for

immigrant. And then I didn't know it at the time but very early in my career, I worked for an NGO in Russia and we were part of the foreign aid packages that went to Russia in the early '90s after the Soviet Union disintegrated and I was working on a J1 visa program so I think that counts for immigration. So pretty much my whole career in that space.

Jim Brailer: Wonderful. Thank you. I want to do a quick survey of the statistical landscape and I'll start with Matt. So Matt, can you give us an idea of the overall number of site visits FDNS conducted in the last year and whether this represented a sizeable increase over the prior years and what do you think it's going to look like going forward?

Matthew: So in order for those numbers to make sense, I first need to make a brief explanation of the different types of site visits that FDNS does currently. So many of you are familiar with the Administrative Site Visit and Verification Program (ASVVP). So under that program, FDNS does site visits on H-1B, L-1s, religious workers and, fairly recently, EB-5 petitioners. So that's one thing, ASVVP. A newer type of site visit that we're doing are called targeted site visits so we also call this, logically, the Targeted Site Visit Verification Program. So that is relatively new. I'll talk a little bit more about that later but an example of that right now would be the site visits that were just announced in April 2017, as part of the implementation of the Buy American and Hire American Executive Order. So those focus in on certain types of H-1B petitions.

The reason that we're starting to do these targeted site visits is it allows CIS to focus resources where it is believed that fraud and abuse of certain programs are likely to occur. So that's two different categories. And then the third type of site visit that FDNS does is called For Cause. So if there is reasonable suspicion of fraud in any other type of application or petition that CIS handles, FDNS may, as part of the administrative investigation, go out and do a site visit. So as far as those first two categories, the combined total of those first two categories, ASVVP and TSSV, is a little bit over 10,000 so that is fairly consistent number with previous years. CIS has in the last few years, done around 10,000 site visits. The difference is we are starting to do more targeted site visits and less ASVVP site visits, although ASVVP will continue. So the total number increased modestly last year and I expect that that will continue in the future. Our total number of site visits is tied to resources so we did receive some increases in resources last year to do site visits so hence the slight increase but unless we got some huge influx of staffing, I would not anticipate any huge increase of site visits in the future.

Jim Brailer: Thank you. So Kathy, turning to Verification, what percentage of employers currently use eVerify and what is their makeup? Do you have some sense of the size of the companies and whether certain industries are more likely than others to use eVerify?

Kathy Lotspeich: Sure. It's always very difficult to answer the question about what percentage of employers and that's because we have a very open registration process that allows employers to say sign up with just one location or they could sign up with one location and add

five or six locations to that account. So if you look at our data, we look at the people that have signed an agreement with us and that, right now, numbers to be 791,000 employers. And if you look at how many sites they represent, that's 2.5 million sites. But people could also sign up, say if you're a McDonald's franchisee, you could sign up each one independently or you could have one with 50 on it. And so it's hard for us to always take those two datasets and compare them to the Census Bureau's firm and establishment datasets. So, again, I wish we could do that so I could answer this question at panels. But I think it's better to let the private sector figure out how they want to register with us, what's convenient for them and how they organize their internal HR systems.

As an indicator of usage, we look at how many queries have been run. So last fiscal year, we ran about 30 million queries nationwide. This year, we've so far run about 23 million queries. The economy in a given year fluctuates, of course, but could 55 to 65 million hires in a given year. So that gives us a kind of indicator of how often its used nationwide. In terms of the type of company that uses eVerify, no surprise here. Hopefully, it's mostly small businesses. Well, there's mostly small businesses in the US economy. The largest cohort of employers enrolled in eVerify have under 20 employees and that's sort of our biggest chunk. Though, if you look at that number compared to the number of companies in the United States that have under 20 employees, then we're actually really small portion of that because that's just the largest cohort of company size. And that is definitely a target area for us in terms of outreach and education.

We do capture what's called the NAICS code, North American Industrial Classification System code and we have this on our website as well. If you go to everify.gov, we have a map of the U.S. You can click on each state and find out how many employers enrolled in that state, how many hiring sites, how many queries they ran and we also have a listing of how they enrolled by NAICS code. We tend to primarily be used by staffing companies. That's sort of the largest group and the service industry so restaurants, construction, things like that. We also have a lot of public administration type organizations enrolled in eVerify and that's because there's many states that require eVerify. About a handful of them require eVerify for the entire state. But those that don't, that do have some eVerify legislation, are required for the state governments so we do see a lot there. And did you ask me, also, about the tentative nonconfirmation rates?

Jim Brailer: Yeah. So in follow-up to the statistics, what trends can you share regarding those tentative and final nonconfirmations as well as eVerify error rates?

Kathy Lotspeich: Okay. So on the whole; we've stayed pretty consistent over the years in terms of the data. We also have that on our website. We have a pie chart that we update each quarter of what happened the previous quarter with outcomes from eVerify. And I looked at our last one, which is current through March. About 90.9% of the cases that get run through eVerify right now come out as employment authorized and of the total pie, a little less than 1 percent or 0.9 percent are not found work authorized and that's actually been pretty consistent over the past 5, 10 years almost. That's where we are.

Jim Brailer: Okay, great. As the President continues to make requests for funds for nationwide eVerify and bills could move in Congress that could make this reality, what would be entailed to scale eVerify? Should it become mandatory?

Kathy Lotspeich: So this is certainly something that we think about all the time. In our budget office, we actually have a team that develops models for forecasting for if this were to become mandatory, where would we scale up. And a lot of if, of course, depends on what the legislation requires. So if there were a bill that require eVerify just for new hires going forward, that would be a different set of calculations versus if there were a bill required for employers to have to verify people that they've hired in the past because we have seen some proposals that do include that type of language. But basically as the number of cases inputted into eVerify increases and the number of employers registering increases, we do see more activity on our call center, which we have internally because newly enrolled employers will call and ask questions to help, get setup. And then secondly, as the caseload increases, so does the chance that somebody wouldn't clear and so there'd be more of those types of cases to work. So those tend to be the two part of our operation that we look at for scaling and we have a formula to try to determine how much more resources we would need if either of those activities picked up and by how much.

Jim Brailer: Thank you. So Matt, back to FDNS and you touched on this a little bit earlier but I wanted to focus in a little bit more on this memo that USCIS issued in April of 2017 entitled "Putting American Workers First: USCIS Announces Further Measures to Detect H-1B Fraud and Abuse" announcing the more targeted approach that Matt already alluded to. Can you go into a little more detail about what the agency's overarching site visit policy is and how it has changed since the announcement and implementation of this memo?

Matthew Emrich: So the main change that has come about as a result of that Executive Order in the arena of site visits is the start of the targeted site visit program. So the one that you may be most familiar with is H-1B so as been publicly announced, the H-1B targeted site visits focus on H-1B dependent employers, employers with offsite employees and employers whose business information cannot be verified through commercial means. So that is not the only thing that we're doing under the designation of targeted site visits. We have also conducted or are conducting pilots on targeted site visits into L-1Bs, E-2 treaty investors and not only on employment-based but we also have done them on petitioners to remove conditions of residents who obtain status through marriage. So those are current targeted site visit programs. I anticipate that those will continue and that we will start doing more pilots on additional types of applications and petitions.

As far as ASVVP, as I explained earlier, the targeted site visits are going to take up a larger chunk of the resources that were formally doing the ASVVP. So ASVVP will not go away any time soon. I'm not as dialed in as the previous panel but I haven't heard any talk of that so those will continue. And we will continue to explore the targeted site visits. To give some sense of

the proportion there between ASVVP and targeted, so between October 1, 2017 and June 14, 2018, FDNS conducted 5,851 administrative site visits and 472 targeted site visits. But again, the numbers of targeted will go up and numbers of ASVVP will likely go down slightly.

And what we're working towards with the targeted site visits is we need to carry out our mission of deterring, detecting and combating fraud, we need to apply our resources where they make the most difference. So we want to look at programs that we think site visits can make the most with that calculus as a combination of where we know fraud is, where we think fraud is, where the site visit is valuable and uncovering information that we wouldn't get otherwise. Those are the things that go into that calculation. And we're always striving for efficiency and the aim of our mission of maintaining the integrity of the lawful process, which is to everyone's benefit.

Jim Brailer: Thank you. And Matt, at FDNS, how has the recently announced change in policy on H-1B filings, and that is, what is and is not acceptable for third party placement, which I know. I already got one question about that today. How has that changed FDNS activities? What are officers looking for when they visit third party worksites, if you're able to shed some light on that?

Matthew Emrich: Sure. So on February 22nd of this year, USCIS issued updated guidance via agency policy to clarify requirements for establishing the employer/employee relationship when H-1B workers are placed at third party worksites.

So as is often the case in what FDNS does, the agency has to adapt to changes in policy such as this or court cases or new regulation. So it's not new to us. What we do when something like this happens is we will draft updated training materials for our officers in accordance with the new policy regulation or press that legal case, we will run those by our agency counsel and our agency Office of Policy and Strategy so every office at CIS gets to look at that. And we will make whatever modifications to our procedures that are required by that policy. So this policy in question does not change the fundamentals of a site visit so officers will still show up. The site visit is still unannounced but voluntary compliance; they will ask questions and ask for certain documents.

When it comes to the administrative site visits, the questions are fairly straightforward. Since that's a random compliance review, there will not be a whole lot of variance between the questions asked. With the H-1B targeted site visits, we provide our officers with a framework of questions to ask in this third party scenario. Our officers are fully trained and able to recognize issues that need follow-up so they're empowered to ask follow-up questions. And when they go out, they will generally have information on why, what type of targeted site visit that is and why that came about. So when we're talking about the third party worksites, things they'll be looking for are documentation and basically the chain from the petitioning employer down to the oversight of where the employee is actually working, copies of statements of work and descriptions of employee duties and basically things that document why that worker is where

they are, what they're supposed to be doing, what the kind of up and down chain of relationship is from employee to the petitioning employer.

Jim Brailer: Thank you very much. Kathy, have you talk a little bit about the use of technology at Verification. You know eVerify recently made some updates regarding the eVerify user experience. Can you describe some of these updates and also maybe give us a peak into mobile eVerify capabilities in the future?

Kathy Lotspeich: Sure. So yes, we had a release on April 20, and it was pretty monumental. There were a lot of front end changes that those of you who access eVerify directly into our eVerify website probably noticed we significantly changed a lot of the data entry features. We have more helper text. We are trying to reduce any unnecessary queries. Before, you could put a social security number. You could put 1111111 and you wouldn't get a match, hopefully, but we would let you do that and there'd be a case created but we stopped that so any kind of numbers, A numbers, green card numbers, SSNs, things that are just not valid, we no longer allow any of that entry into our system.

We also tried to eliminate some of the steps making it all one screen, just sort of every time you add data, it would drop down some more because before, you would page from screen to screen. And we also worked on auto-resolving cases that were found work authorized. For many years, if we had a case that was found work authorized, we asked you a series of annoying questions about does the person still work here, did they work here with their dad, do they have green eggs and ham? We asked all these questions and we never really did anything with that data. So we said, "Well, why are we asking them these questions?" Just work authorized and move on. So we did a lot of changes on that side but we did a significant behind the scene change and that was we created a whole new system called the person-centric system. And that system will go to all of the USCIS and DHS data sources and match them up and try to find the most recent and true record of that person's status and give eVerify the answer.

Prior to that, if somebody had different records living in different systems, because that happens, we would send it back and we would have to manually resolve it ourselves and we'd have one of our staff look at that. So we're very excited about this, what we call, PCS, and we have seen a drop in tentative nonconfirmations on the eVerify side and we're looking to, later this year, add that PCS to SAVE and drop pieces even more on the SAVE side. So this was a really big behind the scenes change.

There was, however, some issues that we had with those employers that use eVerify through another provider's software. Some of you may access eVerify through a different company that not only lets you use eVerify but you can do other activities as well, onboarding, payroll, other HR systems. And some of the compatibility between the new logic and the software providers was not that clear before we did this release and we've been doing a lot of additional testing and work with these providers. So I just want to assure you if you've seen some issues and you don't

use eVerify directly but you go through a provider, it's not your provider's issue. It's something that we're working on to resolve for the system logic. And we did just post on everify.gov last week, a notice stating such. So we wanted to make sure the providers weren't out in front of this but that we recognize and acknowledge that that has been issue following this release but we are 100 percent committed to rectifying that and to have pretty much all hands on deck. We're stopping any further development at this time until we can get that sorted out.

With regards to mobile eVerify, I think at one point, we talked about having a mobile app but the agency went in the direction of what's known as responsive web design or RWD so our eVerify interface will always be readable and convenient on a smartphone whether it be an Android or an iPhone so that way we didn't have to maintain an app. We did develop one and pilot it for a short while but we realized that it was more cost effective to have RWD so that any changes we make on eVerify will automatically be seen by someone using it from a tablet or a smartphone. So no mobile app but responsive web design is where we're going.

Jim Brailer: Great. Thank you, thank you. Given the DOJ recent announcement of a memorandum of understanding with USCIS that will increase the ability of the agencies to share information and help identify, investigate and prosecute employers who may be discriminating against US workers and/or violating immigration laws. Could you describe, in a few minutes, what this memo does in practice? Kathy, and then Matt, how have you seen your agencies adapt its practices of sharing information or providing information to other...

Kathy Lotspeich: Well we've had an MOA with the Department of Justice and also with ICE; I want to say almost ten years now. It's been a while so I don't see any change or any increase in that, actually. We do have a monitoring compliance unit that looks at data, pulls reports on a monthly basis and follows up with employers and makes referrals as needed. In FY17, we conducted approximately 130,000, what we call compliance touches and this information is also on our website. And that could be anything from a telephone call to an employer to an email to an employer telling them you ran this person after three days of hire. Why is that? But we do make referrals to ICE and DOJ. It's very small number. It's not 130,000, I can assure you.

But we do make referrals – we make more to DOJ, I would say, than ICE and the reason for that is because if you look at the data, it's easier to see anomalies in the data for something that might be discrimination in terms of over documentation or not referring cases that get TNCs, tentative nonconfirmations. With ICE, it's harder to see fraud frankly because fraud would be something that you all would see or not see if somebody had documents that were borrowed or pure genuine, with valid data on it, that data will match in eVerify and you will get an employment authorized response. So it's harder for us to see that.

This past year, we did start doing some Form I-9 reviews, however, so we've reached out to some employers, asked them to send us their Form I-9s and we've looked at the data on the Form

I-9 to see if it was compatible to what was actually entered into eVerify trying to see if there was any kind of potential fraud there. We're still in very early exploratory stages of that activity.

And an emphasis, also, that we've had with this administration with regards to monitoring is ensuring that federal contractors who are required to use eVerify are indeed enrolled and using it. So we've been partnering with the DHS Office of Contracting and they've been sharing with us lists of contractors that are supposed to be using eVerify and we're checking to see if those people are in fact in our system and if not, Contracting reaches out to them and ask them to attest that they are then we'll validate. So that's been a little bit of an emphasis that we've had in terms of monitoring.

Jim Brailer: Okay. Great. Thank you. How about you, Matt?

Matthew Emrich: So as previously been mentioned, we recently executed an MOU with the Department of Justice. We have recently done one with the Department of Labor. We're working on things with Department of State so it's not only efficient for what our agencies do but it's also a good government practice to make things as efficient as possible and share information. So within the constraints of the privacy regulations and things like that, we're all working on sharing information.

How FDNS handles information that we get from other agencies, so regardless where the tip information comes from, we still have the same documentary requirements and standards for when we do an administrative fraud investigation. So if a tip came in from another agency, we take a look at the facts just like we would if it came from anywhere else. We substantiate the information there, make sure it's actionable, that we can do something with it and then we go about our business of an administrative investigation and investigate and document.

Jim Brailer: Thank you. I want to leave time for a few questions from the audience but real quick, I want to jump back to the site visits. Matt, as we know, there are site visits for H, L and R visas. With regard to L, currently it's doing L-1A. Do you anticipate L-1B investigations going forward?

Matthew Emrich: I mentioned the pilot with the L-1Bs and I anticipate that will continue but I can't make any assurances that it will or will not until we fully analyze the results of that. That is a little bit of a different one since we've got officers looking at specialized expertise, which they didn't have to look at in some of the other types of site visits. So there are some training aspects there but that will continue until we have enough to evaluate it.

Jim Brailer: Okay. So you don't have a set end date to the pilot? It's going to continue...

Matthew Emrich: Yes.

Jim Brailer: ...for foreseeable future? Okay. And then one more question for Matt. Back in 2017, FDNS officers occasionally began asking for copies of diplomas and transcripts that were

already including with valid petitions. Can you tell us what the officers are doing with these items, comparing them with documents already submitted with the petitions or are they attempting to verify the education in some way that's claimed in the petition?

Matthew Emrich: So as I mentioned earlier, we give out a framework to our officers of what they should ask and look for and then a lot of what they do is done on a case-by-case basis. Without knowing the specifics here, I can't state with certainty what happened in these cases. There has not been any agency-wide guidance concerning copies of diplomas and transcripts. But we do give our officers latitude in what they need to ask for and the different techniques that they use when they're doing a review.

Jim Brailer: Great. Thank you. Do we have any questions from the audience? Go ahead, in the back. We'll take the one in the back first since the microphones are back there.

Speaker: Hi. This question is for Kathy. I manage all the I-9 eVerify compliance for a major Big Ten research institution and we are only required by federal law to participate in the FAR eVerify clause. We have over 30,000 employees on campus. Less than one percent are represented by that on eVerify. We continue to get compliance emails. I finally called a couple weeks ago and I just said, "Out of curiosity, do you know that we are FAR eVerify only?" And the person I spoke to said, "No, we don't know that. We can just look your account up and know." And I guess I wanted clarity from you because that's a problem for me because my boss, the vice president of human resources and the president of the university think we're out of compliance. And I've had this happen now multiple times. We had actually USCIS come a year ago and wonderful meeting. They were like, "Wow, you guys know your stuff," which was great but the problem is that the emails we get appear to say we're out of compliance and it's only less than one percent that we have to do and we are very strict about that.

Kathy Lotspeich: I think I heard your question. You're basically saying that you're with a university and that you are not required to use eVerify across the university according to the FAR and yes, that is absolutely true and I totally know that and I worked on the FAR and I know that you all had an exemption. And you're saying that you're being told that you're not in compliance by whom? Who is telling you that?

Speaker: When I call the eVerify number and ask and I've done this numerous times, they'll say, "Well, those are just generic emails," and I'll say, "Okay but we only participate in the FAR eVerify clause and the emails seem to imply that we are not eVerifying every new hire because we are not required to by law. And they don't really say anything because they don't know about FAR eVerify so that's what my question is. Is there someone else when I call that I should say, "Hi. I'm with only the FAR eVerify clause. Do you have a specialist that can speak to me?" Is that what I need to do?

Kathy Lotspeich: No. It doesn't really matter why you're required to use eVerify in a way, to our program. It matters how you're using it because we didn't write the FAR. We're familiar

with it. It sounds like our call center is not understanding the university exemption and so that's something I'd like to address with our operations team. So thank you for raising that.

Jim Brailer: Thanks, Kathy. And one more question up front.

Angelo Paparelli: Mr. Emrich, my name is Angelo Paparelli. I practice immigration law in California with Seyfarth Shaw and I had a couple of questions. One is that have you given any advice to the field about how FDNS will deal with California-based employers who by California law assembly bill 450 cannot give you access to the nonpublic areas of a worksite because that law prohibits it unless you provide a judicial warrant and FDNS usually doesn't provide a judicial warrant. So have you given any advice on that?

Matthew Emrich: No. I was just out at our western region office speaking to the supervisor immigration officers and we did have some discussion about that. We still have not issued any specific guidance to our officers who work there on that topic, though, but they're very aware of it and we're discussing it.

Angelo Paparelli: Well I'm aware of at least one instance where an employer tried to cooperate but explained that they were being asked to violate state law and the threat was that all future petitions from that employer would be denied for failure of cooperation because there's a signature authorization on the Form I-129 that says you'll cooperate. So now an employer is caught between federal and state skirmishing.

Matthew Emrich: Yeah. Something I will certainly look into but I'm not familiar with the specific instance.

Angelo Paparelli: Okay. The other thing is the targeted site visits based on the Buy American Hire American Executive Order. It seems as if targeting investigations contradicts the Homeland Security Act which divided up the three functions between enforcement with ICE and CBP taking over that and USCIS taking over benefits and I'm not really sure in the absence of violations of law, what the authority is for FDNS to do that. Shouldn't that be an ICE function?

Matthew Emrich: No. I don't agree with that. Just because CIS has a delegation that it can pursue suspected violations as it pertains to immigration benefits, now does that mean if we were to use your definition, we would have no discretion whatsoever. We would just do everything randomly, which doesn't seem like a good practice nor do I believe that's in the spirit of the delegations and the intent of splitting those agencies up.

Jim Brailer: So that's all the time we have. Please join me in thanking our panelists.