July 3, 2014

MEMORANDUM FOR: Mark Schwartz
Chief Information Officer
U.S. Citizenship and Immigration Services

FROM: Richard Harsche
Acting Assistant Inspector General
Office of Information Technology Audits

SUBJECT:  
U.S. Citizenship and Immigration Services Information Technology Management Progress and Challenges

Attached for your information is our final report, U.S. Citizenship and Immigration Services Information Technology Management Progress and Challenges. We incorporated the formal comments from the U.S. Citizenship and Immigration Services (USCIS) in the final report.

The report contains four recommendations aimed at improving USCIS’ information technology management. Your office concurred with the recommendations. As prescribed by the Department of Homeland Security Directive 077-01, Follow-Up and Resolutions for Office of Inspector General Report Recommendations, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) corrective action plan and (2) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation.

Once your office has fully implemented the recommendations, please submit a formal closeout request to us within 30 days so that we may close the recommendations. The request should be accompanied by evidence of completion of agreed-upon corrective actions.

Please email a signed PDF copy of all responses and closeout requests to OIGITAuditsFollowup@oig.dhs.gov. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

Consistent with our responsibility under the Inspector General Act, we will provide copies of our report to appropriate congressional committees with oversight and
appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Elizabeth Argeris, Audit Manager, at (202) 632-0223.

Attachment
# Table of Contents

Executive Summary ............................................................................................................ 1

Background ........................................................................................................................ 2

Results of Audit ................................................................................................................... 4

  IT Management Capabilities Established ..................................................................... 4
  Recommendations ......................................................................................................... 15
  Management Comments and OIG Analysis ................................................................. 15

Support of Mission Needs ................................................................................................. 16

  Recommendations ......................................................................................................... 22
  Management Comments and OIG Analysis ................................................................. 22

Appendixes

  Appendix A: Objectives, Scope, and Methodology ....................................................... 24
  Appendix B: Management Comments to the Draft Report ............................................. 26
  Appendix C: Major Contributors to This Report .......................................................... 29
  Appendix D: Report Distribution .................................................................................... 30

# Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADIS</td>
<td>Arrival and Departure Information System</td>
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<td>CARB</td>
<td>Component Acquisition Review Board</td>
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<td>CIO</td>
<td>Chief Information Officer</td>
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<td>CIV SIT</td>
<td>Customer Identity Verification Secondary Inspection Tool</td>
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<td>CLAIMS 3</td>
<td>Computer Linked Application Information Management System 3</td>
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<td>CLAIMS 4</td>
<td>Computer Linked Application Information Management System 4</td>
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<td>DHS</td>
<td>Department of Homeland Security</td>
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<td>EDMMS</td>
<td>Enterprise Document Management System</td>
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<td>ELIS</td>
<td>Electronic Immigration System</td>
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<td>EPMO</td>
<td>Enterprise Program Management Office</td>
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<td>FY</td>
<td>fiscal year</td>
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<td>GAO</td>
<td>Government Accountability Office</td>
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<td>IT</td>
<td>information technology</td>
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<td>ITAR</td>
<td>information technology acquisition review</td>
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<td>MD</td>
<td>Management Directive</td>
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<td>Acronym</td>
<td>Full Name</td>
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<tr>
<td>OCIO</td>
<td>Office of the Chief Information Officer</td>
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<td>OIG</td>
<td>Office of Inspector General</td>
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<td>OIT</td>
<td>Office of Information Technology</td>
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<td>OMB</td>
<td>Office of Management and Budget</td>
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<tr>
<td>SELC</td>
<td>systems engineering life cycle</td>
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<tr>
<td>USCIS</td>
<td>United States Citizenship and Immigration Services</td>
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<td>VAWA</td>
<td>Violence Against Women Act of 1994</td>
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Executive Summary

Information technology plays a critical role in enabling U.S. Citizenship and Immigration Services (USCIS) to accomplish its mission. In 2009, we reported that insufficient information technology staffing and limited information technology budget authority impeded the Chief Information Officer. We conducted this follow-up audit to determine USCIS’ progress in establishing key information technology management capabilities to support mission needs.

The USCIS Chief Information Officer has established key information technology management capabilities to support USCIS’ mission. Specifically, the Chief Information Officer:

- created a draft information technology strategic plan,
- developed an enterprise architecture,
- implemented information technology acquisition review and systems engineering life cycle processes, and
- led the advancement of agile methodologies for software development.

The Chief Information Officer still faces challenges, however, in coordinating across internal divisions. Limited communication and coordination can hinder USCIS’ ability to support mission needs, use and allocate resources more effectively, foster a sense of collaboration, and improve morale.

The USCIS Chief Information Officer also faces challenges in ensuring that the information technology environment fully supports USCIS’ mission needs. Specifically, the systems do not fully provide desired functionality, and system reliability is also a challenge. Limited functionality and reliability stem from challenges with infrastructure planning. As a result, the processing of benefits is delayed, and USCIS customers may have to wait longer for a decision on their applications for benefits. In addition, staff members are not always sure which systems to use or which systems are available to perform specific job functions. As a result, staff may not be accessing information that is available to make informed decisions on adjudication of benefits, and staff’s ability to carry out USCIS’ mission may be hampered.

We made four recommendations to the Chief Information Officer, USCIS, to finalize the information technology strategic plan, develop a plan to address senior level staffing vacancies, coordinate with system owners to ensure users are provided with adequate training, and develop a plan to refresh outdated information technology infrastructure.
Background

U.S. Citizenship and Immigration Services oversees lawful immigration to the United States. The USCIS mission is to secure America’s promise as a nation of immigrants by:

- providing accurate and useful information to its customers,
- granting immigration and citizenship benefits,
- promoting an awareness and understanding of citizenship, and
- ensuring the integrity of the U.S. immigration system.

To accomplish its mission, USCIS has 18,000 government employees and contractors working at 250 offices worldwide. USCIS provides its services through a structure that consists of its headquarters office in Washington, DC; 4 service centers; 29 district offices; 136 application support centers; and four regional offices. In addition, asylum offices, telephone centers, the National Records Center, and the National Benefits Center provide services to customers as well. On an average day, USCIS employees:

- process 23,000 applications for various immigration benefits,
- issue 6,100 permanent resident cards,
- process 310 refugee applications, and
- grant asylum to 55 individuals.

During fiscal year (FY) 2012, USCIS naturalized 763,690 new citizens. In FY 2014, USCIS’ budget was approximately $3.4 billion. USCIS’ budget represents 5 percent of the Department of Homeland Security’s (DHS) overall budget of approximately $59 billion.

Information technology (IT) systems play a critical role in enabling USCIS to accomplish its mission. USCIS’ Office of Information Technology (OIT) provides the IT, expertise, and strategic vision necessary to enable USCIS to deliver effective, efficient, and secure immigration services and products. OIT supports USCIS personnel who use approximately 25,000 computers. As of August 2013, OIT employed 2,138 staff, including 420 Federal employees and 1,718 contractors. In FY 2012, USCIS’ IT spending was approximately $379 million.

To plan and manage USCIS’ critical IT environment, OIT is organized into seven offices and divisions, as shown in figure 1:
• Office of the Chief of Staff,
• Resource Management Division,
• Office of the Chief Technology Officer,
• Information Security Division,
• Enterprise Infrastructure Division,
• End User Services Division, and
• Systems Engineering Division.

Figure 1. USCIS’ OIT Organizational Structure as of August 2013

The Chief of Staff assists OIT in delivering IT services to the enterprise through managing coordination and collaboration across the organization. The Resource Management Division leads the development, execution, evaluation, and reporting of the OIT budget, and directs and manages the full cycle of all IT acquisitions. The Chief Technology Officer provides enterprise architecture guidance to deliver IT capabilities and technology solutions in support of USCIS’ mission and strategic objectives. The Information Security Division implements DHS Information Security Program policies, procedures, standards, and guidelines throughout the agency.

In addition, the Enterprise Infrastructure Division provides IT infrastructure engineering, design, testing, implementation, and operational support services for the agency, including networks, server rooms, data storage, telecommunications, video conferencing services, and infrastructure security. The End User Services Division partners with USCIS customers to enable them to access reliable, effective, secure, and flexible end user services essential to achieving their missions. Finally, the Systems Engineering Division coordinates, directs, manages, and oversees the description, design, development, and integration of IT services that support USCIS.
OIT is responsible for designing, developing, and integrating all IT systems that support USCIS operations. Some of USCIS’ major IT systems and programs include the following:

- **Computer Linked Application Information Management System 3 (CLAIMS 3)** — This legacy immigration case tracking and processing system is used for adjudicating applications and petitions for immigration benefits and services other than naturalization, refugee status, and asylum.
- **Computer Linked Application Information Management System 4 (CLAIMS 4)** — The purpose of this legacy system is to provide immigration benefits and services to naturalization applicants.
- **Infrastructure, End User Support** — This program supports the operations and maintenance infrastructure of the agency.
- **Transformation** — Transformation’s goal is to modernize USCIS by transitioning the agency from a fragmented, paper-based environment to a centralized, paperless environment using electronic adjudication.
- **Verification Information System/Employment Eligibility Verification** — This program supports the Systematic Alien Verification for Entitlements Program. In addition, the E – Verify program uses the Verification Information System to allow participating employers to verify employment eligibility of new employees.

Effective management of IT systems is important to support mission operations. In previous audits, we identified challenges with USCIS’ IT management and infrastructure. Specifically, in 2009, we reported that insufficient IT staffing and limited IT budget authority impeded the Chief Information Officer (CIO). Although USCIS improved its IT infrastructure, other IT efforts were stalled due to limited funds. In 2011, we reported IT management challenges in USCIS’ implementation of its Transformation program, such as insufficiently defined system requirements and governance and staffing problems, which led to delays in the delivery of capabilities. As a result, USCIS continued to rely on paper-based processes.

**Results of Audit**

**IT Management Capabilities Established**

The CIO led actions to establish key IT management capabilities to support the USCIS mission. Specifically, the CIO developed a draft IT strategic plan that defines key goals and objectives for fulfilling USCIS mission responsibilities. In

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addition, the CIO developed an enterprise architecture and implemented IT acquisition review (ITAR) processes. The CIO also implemented a systems engineering life cycle (SELC) process to manage IT programs. Further, the CIO led the advancement of agile methodologies for software development. As a result, critical capabilities exist within OIT to help ensure effective IT management and guide future initiatives.

USCIS OIT has also made progress in communicating and coordinating internally and with key component stakeholders by establishing regular meetings and communication channels. However, USCIS OIT still faces challenges in coordinating across OIT divisions due in part to senior level staff vacancies. Limited communication and coordination can hinder USCIS’ ability to support mission needs, to use and allocate resources more effectively, and to foster a sense of collaboration and improve morale.

**Strategic Planning**

The *Government Performance and Results Act of 1993* holds Federal agencies responsible for strategic planning to ensure efficient and effective operations and use of resources to achieve mission results. Additionally, Office of Management and Budget (OMB) Circular A-130, as revised, instructs agency CIOs to create strategic plans that demonstrate how information resources will be used to improve the productivity, efficiency, and effectiveness of government programs. DHS Management Directive (MD) 0007.1 requires component CIOs to develop and implement an IT strategic plan that clearly defines how IT supports an agency’s mission and drives investment decisions, guiding the agency toward its goals and priorities.

The USCIS CIO drafted the *USCIS OIT Strategic Plan, 2013–2017*. The goal of the draft plan is to provide a vision for an OIT of the future, such as the systems and capabilities it will offer the agency and the processes OIT will use. In addition, the plan conveys how OIT will work with the rest of the Management Directorate to support the agency’s mission.

The draft plan identifies an IT strategy that describes the CIO’s vision, mission, goals, and objectives through 2017. The plan includes five goals:

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6 At the time of our fieldwork, USCIS had not finalized and implemented the OIT Strategic Plan.
• increase responsiveness to agency needs by executing projects rapidly, nimbly, reliably, and efficiently, using best practices and focusing on business results,
• provide an infrastructure and architecture that are aligned with the future needs of the agency and Department,
• be trustworthy stewards of the agency’s resources,
• support Transformation with a view toward making the Electronic Immigration System the center of OIT’s future architecture and processes, and
• expand OIT’s footprint gently by using it to drive business value creation.

To accomplish these goals, the USCIS CIO established specific objectives for each goal. For example, to meet the goal to increase responsiveness to agency needs, the plan identifies three objectives:

• develop a project and program management function that is customer-centric and oriented toward results measured in business value,
• build an agile organization and infrastructure to provide flexibility, faster solutions, and reduced costs to the agency, and
• measure business results and service levels against pre-established goals.

The goals described in the USCIS OIT Strategic Plan, 2013–2017 align with USCIS agency-wide goals. The plan supports agency goals to provide effective customer-oriented immigration benefit and information services, strengthen the security and integrity of the immigration system, and strengthen infrastructure.

The plan also aligns with the DHS IT Strategic Plan, 2011–2015 to ensure that USCIS OIT supports the DHS CIO’s Department-wide IT goals. Table 1 shows the alignment of USCIS OIT goals with DHS IT goals.
Table 1. Alignment of USCIS OIT Goals with DHS IT Goals

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To provide a more complete vision, OIT also drafted a Strategic Human Capital Plan and a USCIS OIT Enterprise Architecture Vision. The Strategic Human Capital Plan provides the concept for how OIT will develop, recruit, and support the OIT workforce from 2013 through 2017. The Enterprise Architecture Vision illustrates where the design of the agency’s systems will move during that period. OIT’s development of the Human Capital Plan and Enterprise Architecture Vision, in addition to the OIT Strategic Plan, provides a more complete strategy to ensure the alignment of people, processes, and technology to achieve Departmental and USCIS goals.

**Enterprise Architecture**

The *Clinger-Cohen Act of 1996*, as amended, and OMB circulars mandate the establishment and use of an enterprise architecture to guide and direct government investments from inception through retirement. In addition, OMB Memorandum M-11-29 states that CIOs must use an enterprise architecture to consolidate duplicative investments and applications. An enterprise architecture

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8 OMB M-11-29, *Chief Information Officer Authorities*, August 8, 2011.
describes the current architecture, target architecture, and transition strategy for attaining the target goals and objectives. An enterprise architecture enables leadership to prioritize available resources to support mission functions, ensures that mission requirements drive technology investments, and identifies current capabilities and performance gaps as well as projected future gaps.

The USCIS CIO developed and implemented an enterprise architecture to align with the Department’s architecture and guide the USCIS IT environment. Since FY 2011, USCIS has provided the Department with a self-assessment status report each quarter on its enterprise architecture program. In these quarterly assessments, USCIS rated its progress against the Government Accountability Office (GAO) Enterprise Architecture Management Maturity Framework. In FY 2011, USCIS identified its enterprise architecture maturity at stage three of the six stages of the framework, which indicated that USCIS was developing initial enterprise architecture versions. In FY 2013, USCIS rated its progress at stage six maturity. In this stage, USCIS is continuously improving the enterprise architecture and its use to support the agency’s mission. Figure 2 shows USCIS’ enterprise architecture maturity within the stages of the Enterprise Architecture Management Maturity Framework.

Figure 2. USCIS Maturity within the Enterprise Architecture Management Maturity Framework

Since 2011, the Homeland Security Systems Engineering and Development Institute, the Department’s federally funded research and development center,

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has conducted independent, objective reviews of the quarterly status reports of select DHS components. As of the second quarter of FY 2013, the Institute independently identified the USCIS enterprise architecture program at stage six maturity. According to the independent assessment, the USCIS enterprise architecture program is high-performing and extremely mature.

**IT Acquisition Review**

DHS MD 0007.1 requires component CIOs to submit IT acquisitions valued at $2.5 million or greater to the DHS CIO for review. This directive also requires component CIOs to approve IT acquisitions less than $2.5 million.

USCIS implemented IT acquisition and investment management processes that comply with DHS policies. Specifically, USCIS issued Management Directive 102-001, *Acquisition and Investment Management*. This Directive provides transparency into program performance, ensures effective utilization of resources, and enables effective decision making by senior leadership, including the USCIS CIO.\(^\text{10}\)

The Directive requires that USCIS customers submit a request to OIT for acquisition review after completing a Mission Needs Statement. A Mission Needs Statement includes a business case explaining why the IT investment is needed. During the acquisition review process, OIT responsibilities include:

- ensuring that current and proposed IT investments, programs, and projects are in compliance with the enterprise architecture and support DHS and USCIS strategic goals,
- evaluating compliance with data, privacy, and security requirements of IT investments, and
- vetting and reporting IT investments prior to their submission to the Component Acquisition Review Board (CARB), the Component Acquisition Executive, and the Department for review and approval.

When the acquisition review is complete, OIT submits all acquisitions with $150,000 or more in lifecycle costs to the CARB. The CARB is a senior management board that ensures acquisitions align with strategic objectives, reflect USCIS priorities, and meet mission needs. The CARB is chaired by the Associate Director for Management and comprised of senior representatives from selected agency lines of business including OIT, Directorate leadership, the

Office of Transformation Coordination, the Office of the Chief Financial Officer, and the investment sponsor. Further, the USCIS CIO, or the Deputy CIO, and the Director of Management, who is the Component Acquisition Executive, approve IT acquisitions over $150,000.

Once approved by the CARB, USCIS IT acquisition requests totaling $2.5 million or more are submitted to the DHS Office of the Chief Information Officer (OCIO) for approval. The DHS OCIO reviews each acquisition from an enterprise business and technical perspective to ensure alignment with DHS enterprise architecture, information security, and accessibility standards and policies.

A synopsis of the acquisition is then provided to the DHS OCIO and management for final review and approval. In FY 2013, USCIS submitted 51 acquisition requests to the DHS OCIO for approval.

Systems Engineering Life Cycle

DHS Acquisition Instruction/Guidebook #102-01-001, Appendix B, requires agencies to follow a SELC process. The purpose of the DHS SELC is to establish a standard system life cycle framework across DHS agencies and to ensure that DHS IT capabilities are delivered efficiently and effectively.

The USCIS CIO implemented the DHS SELC process in compliance with Departmental guidance. OIT uses the USCIS SELC Guide to manage USCIS IT projects using the SELC methodology. The USCIS SELC Guide highlights key components of the life cycle with information on how the life cycle applies to USCIS project managers and other stakeholders in the project life cycle. It describes SELC requirements and presents critical information for each stage of the SELC. Figure 3 shows the stages of the SELC.

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The OIT Enterprise Program Management Office (EPMO) manages and maintains the USCIS SELC. EPMO staff assist business owners, project managers, infrastructure liaisons, or anyone leading a project, change, or release initiative to clarify life cycle requirements, provide templates, and generally guide programmatic activities associated with SELC compliance. Additionally, EPMO representatives provide guidance in crafting an appropriate Project Tailoring Plan, developing documentation, and preparing for reviews.

The CIO’s implementation of the SELC process should help USCIS ensure that its IT investments will support USCIS and DHS strategic goals.

Agile Development Process

The USCIS CIO adopted an agile approach for software development. In addition, the USCIS CIO has led the advancement of agile methodologies throughout DHS. Agile approaches use an iterative, incremental process that is characterized by small, frequent releases developed in close collaboration with the customer. These practices provide frequent opportunities to obtain customer feedback and improve the quality of the product.

USCIS OIT began implementing standards, processes, and tools to support agile best practices. OIT’s Management Instruction CIS-OIT-001, *Agile Development Policy*, establishes the USCIS policy, procedures, requirements, and responsibilities for the use of an agile development approach.\(^\text{13}\) To provide tools for agile development, OIT is developing the Standard Management Analysis Reporting Tool Business Intelligence environment, which will provide better access to data for reporting needs. OIT also developed the Standard Lightweight Operational Programming Environment, which provides USCIS business lines with local application development to meet the IT demands of the business. In addition, OIT is reworking the SELC, streamlining governance processes, and

leveraging DHS’ cloud as-a-service offerings, which reduce costs and improve overall service levels.

The USCIS CIO provided agile development training to USCIS staff. For example, to facilitate the change internally, the CIO brought in agile coaches to train OIT staff; operational staff, such as program managers in the Customer Service and Public Engagement Directorate and the Office of Transformation Coordination; and USCIS leadership. Other forms of training include brown bag sessions, in-house classes, recommended reading lists, and agile training events.

USCIS OIT used agile methods to deliver a number of systems and releases successfully. For example, USCIS used agile development to create the Refugee Officer Scheduling System, which allows refugee officers to review calendars and scheduling reports to ensure accuracy. The success of this small agile project led to larger scale projects. Specifically, OIT transitioned the Transformation program—a large, complex IT project—to an agile approach. Transformation’s goal is to modernize USCIS by transitioning the agency from a paper-based environment to a paperless environment using electronic adjudication. As part of the Transformation program, USCIS launched the first phase of the Electronic Immigration System (ELIS), an online, account-based system. Through ELIS, customers electronically submit applications and supporting documents.

For the program’s first release of ELIS, Transformation used a waterfall development methodology. This methodology is often used to develop the early releases of large IT projects.\(^\text{14}\) In 2012, for the development of the second release of ELIS, the Transformation program began transitioning to agile software development methodology. Agile teams began working on releases for enhancing the functionality available to adjudicators and background check officers. OIT issued releases of the system every 4 months. The Office of Transformation Coordination identified the Transformation reform from waterfall to agile as its biggest success.

Agile methods used during software development projects can reduce the risk of project failure and assure that the delivered system performs as intended. These methods aim to improve value, reduce project risk, lower cost, improve visibility, and better adapt to changing needs. With the appropriate blend of tools, processes, and people with appropriate skill sets, the USCIS CIO can use these

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\(^\text{14}\) Waterfall development methodology is a highly structured development process where all stages must be conducted sequentially until all requirements are fulfilled in a complete system.
agile approaches to support the agency better in its goals, such as completing the USCIS Transformation effort.

Communication

According to DHS MD 0007.1, IT integration and management require strong communication.

The CIO increased communication channels within OIT and with internal USCIS customers. Specifically, each week, the CIO meets with senior OIT staff to discuss OIT’s key priorities. Additionally, the Deputy CIO meets with senior OIT staff to discuss in detail operational concerns and financial information. Further, the CIO holds a monthly meeting with all OIT staff, and participates in a monthly meeting with USCIS senior leaders, including regional and Service Center directors.

Senior staff outside of OIT in offices such as Management, Customer Service and Public Engagement, and Transformation noted the increased collaboration with OIT. OIT’s Systems Engineering Division holds monthly meetings with the Enterprise Services Directorate and Field Operations. In addition, the Systems Engineering Division holds weekly meetings with Verification, and also conducts frequent meetings and project management reviews for specific projects. Further, OIT End User Services communicates information to the field via newsletters and emails, and holds monthly town hall meetings with Field Operations and Service Center Operations to exchange information with customers in the field offices. Regional office staff with whom we met said that these monthly meetings are helpful for sharing information and discussing problems.

In addition, OIT created customer service liaison positions, which has helped increase coordination between OIT and the field. Customer service liaisons coordinate between OIT and the end users in field locations to enhance communication, to provide greater coordination of service delivery, and to help satisfy customer needs. As the face of OIT to end users, customer service liaisons offer a critical communication pipeline between OIT and end users. Customer service liaisons communicate OIT policies and goals to end users in the field, and are able to communicate user requirements to OIT management.

USCIS leadership attributed this more collaborative approach in part to new OIT leadership, including the CIO, Deputy CIO, and multiple division directors.
Challenges with Communication and Coordination

Although communication has increased, USCIS OIT still faces challenges in coordinating across OIT divisions. Staff with whom we met at headquarters and in the field noted a need for more communication, collaboration, and coordination within the OIT organization. For example, when a new contractor-owned facility in Kentucky was being set up, the Enterprise Infrastructure Division was informed in July 2013 that it was responsible for making the new site operational in 90 to 120 days. This task included installing circuits, firewalls, switches, and routers. An OIT team from Vermont had to stop work on other projects to set up the facility, and the deadlines for making the site operational were met.

In addition, OIT divisions would overlap in roles and responsibilities when carrying out the enterprise-wide Work Place as a Service offering, which was being piloted at USCIS at the time of our fieldwork. Work Place as a Service provides users with secure virtual access to DHS and USCIS desktop operating systems and applications through the use of IT devices, such as laptops and tablets. For example, the End User Services Division is responsible for ordering IT equipment for USCIS, while the Enterprise Infrastructure Division is responsible for coordinating with the Enterprise Data Center in which the system is hosted. However, the Enterprise Infrastructure Division received funds to manage the purchase of tablets for the pilots without End User Services management being informed. As a result, End User Services, which tracks equipment to avoid theft, could not vet the process properly.

USCIS also faced significant challenges with coordinating software license management. OIT staff told us that, prior to 2013, licenses and maintenance agreements were not centrally managed. Instead, each OIT division was responsible for managing licenses on its own. In some cases, USCIS contractors installed more licenses than were available, requiring USCIS management to work with the software vendors to resolve the issue.

The CIO is aware of existing challenges with license maintenance renewals and has made it a priority. OIT established a working group responsible for managing all software and licensing agreements. Further, OIT began implementing a licensing and maintenance management process, and created a position description for the Chief, Strategic Vendor Management, who will be responsible for managing software acquisition, compliance with vendor contracts, maintenance renewals, and life cycle planning and costing.
Communication, coordination, and collaboration gaps within OIT are due in part to senior level staff vacancies. At the time of our fieldwork, OIT’s Chief of Staff and Chief Technology Officer positions were both vacant, making it more difficult for OIT to increase organizational coordination and control. Limited communication and coordination can hinder USCIS’ ability to support mission needs, to use and allocate resources most effectively, and to foster a sense of collaboration and morale.

**Recommendations**

We recommend that the Chief Information Officer, U.S. Citizenship and Immigration Services:

**Recommendation #1:**

Finalize and communicate USCIS’ IT Strategic Plan to ensure that IT supports the mission of USCIS and the Department.

**Recommendation #2:**

Develop and implement a plan of action and milestones to address senior level staffing vacancies including Chief of Staff, Chief Technology Officer, and Chief, Strategic Vendor Management.

**Management Comments and OIG Analysis**

We obtained written comments on a draft of this report from the Acting Deputy Director, U.S. Citizenship and Immigration Services. We have included a copy of these comments in their entirety in appendix B.

In the comments, the Acting Deputy Director concurred with our recommendations and provided details on steps being taken to address specific findings and recommendations in the report. We have reviewed management’s comments and provided an evaluation of the issues outlined in the comments below.

In response to recommendation one, the Acting Deputy Director concurred and stated that the draft USCIS OIT Strategic Plan 2013–2017 has been reviewed throughout USCIS and is currently undergoing final review by the USCIS CIO. USCIS expects to finalize and publish the document by September 30, 2014. At that time, the document will be made available on USCIS’ intranet and
communicated via an agency-wide electronic newsletter. We recognize this action as a positive step toward addressing this recommendation and look forward to learning more about continued progress in the future.

In response to recommendation two, the Acting Deputy Director concurred and stated that OIT has made significant progress in addressing senior level staffing vacancies. OIT selected a new Chief of Staff, who is currently going through pre-employment clearance processes. OIT is also interviewing candidates for the new Strategic Vendor Management position.

Further, OIT created a new division, the Applied Technology Division, in May 2014 to ensure that IT systems and services are delivered at a high level of quality and are consistent with the enterprise vision for architecture and practices. The Chief Technology Officer position will reside in this division.

The Acting Deputy Director stated that USCIS is committed to filling the positions noted in our recommendation and is on track to do so by October of 2014. We believe that such efforts are good steps toward addressing our recommendation and look forward to learning more about continued progress in this regard.

Support of Mission Needs

The CIO faces challenges in ensuring that the IT environment fully supports USCIS mission needs. Specifically, the systems do not fully provide desired functionality. System reliability is also a challenge. The limited IT functionality and reliability experienced by users stem from challenges with infrastructure planning. As a result, benefits processing and determinations on applications for benefits might be delayed.

In addition, staff members are not always sure which systems to use or which systems are available to perform specific job functions. As a result, staff may not be accessing information that is available to make informed decisions on adjudication of benefits, and such conditions might hamper staff’s ability to carry out USCIS’ mission.

IT Functionality

According to DHS MD 0007.1, the Component CIO is responsible for the timely delivery of mission IT services in direct support of component mission, goals, objectives, and programs. Further, the Component CIO is responsible for acquiring, developing, operating, and maintaining all mission related systems.
and services. In addition, according to the *Paperwork Reduction Act of 1995*, agencies are required to promote the use of IT to improve the productivity, efficiency, and effectiveness of agency programs, including the reduction of information collection burdens on the public.\(^{15}\)

USCIS’ IT systems do not fully provide the functionality needed to support its mission. For example, as part of its Transformation program, USCIS created ELIS, an electronic immigration system. The aim of ELIS is to provide a more efficient and higher quality adjudication process. However, instead of improved efficiency, time studies conducted by service centers show that adjudicating on paper is at least two times faster than adjudicating in ELIS.\(^{16}\) Immigration services officers take longer to adjudicate in ELIS in part because of the estimated 100 to 150 clicks required to move among sublevels and open documents to complete the process. Staff also reported that ELIS does not provide system features such as tabs and highlighting, and that the search function is restricted and does not produce usable results.

OIT and the Office of Transformation Coordination leadership are aware of the problems with ELIS and solicited concerns from users in operations. USCIS made changes in subsequent releases of ELIS, such as reducing the number of clicks required to perform operations. However, USCIS has been limited in its ability to make changes to ELIS because of challenges with the existing architecture. The architecture consists of 29 commercial software products, which are difficult to integrate. Most changes, like adjusting the interface to make it more intuitive, will be implemented as part of the program’s transition to a more flexible architecture. The start of development in the new architecture began in October 2013. ELIS 2 is scheduled to be deployed by the end of calendar year 2014.

In addition, staff said that it takes longer to process adjudications when using the Enterprise Document Management System (EDMS) than when using paper-based processes. EDMS is a web-based system that allows authorized users to view and search electronic copies of the paper-based case files. USCIS staff access the case files to learn the status of individuals, including permanent residents, naturalized citizens, and other individuals of interest. Staff members

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\(^{16}\) One location’s study showed users adjudicating 1.68 cases per hour on paper versus 0.76 cases in ELIS, and another location’s comparison found that users can adjudicate 2.16 cases per hour on paper and 0.86 cases in ELIS.
use the information to complete their job functions, such as adjudicating requests for Temporary Protected Status.\textsuperscript{17}

Digitization of the files in EDMS reduces the document delivery time, as the files do not have to be shipped across USCIS locations. However, staff said that using EDMS is burdensome. Each document is a separate file that can take 30 seconds or more to load, and staff members are able to look at only one document at a time. In addition, documents are not searchable. The file names used do not always properly identify the information contained in the file, and key documents are sometimes buried in the middle of a longer file. Staff said that these document issues may cause an immigration services officer to miss important information. Several staff members said that they delay work that requires the use of EDMS, with some delaying EDMS cases for months and even up to a year.

Working in ELIS and EDMS creates a marked slowdown in the work processes of adjudicators. The slower systems lead to user frustration and reluctance to adapt to electronic processing. Several personnel told us that IT systems such as EDMS made their jobs more difficult instead of easier. Staff members expressed concern about their slower productivity, and the potential effect on their performance ratings, when using systems such as ELIS and EDMS. In 2012, prior to the deployment of ELIS, USCIS signed a memorandum of agreement with the Union to ensure that staff members who adjudicate in the system would not be penalized for lower production rates. In November 2013, USCIS signed an updated memorandum of agreement, stating that adjudicators would not be penalized for lower production rates in the event of an ELIS outage or non-availability event.

Most critically, because of longer processing times, applicants may wait longer to receive their benefits or decisions on their petitions. The delay may be especially critical for EDMS because it is used to process cases filed under the \textit{Immigration and Nationality Act} as amended by the \textit{Violence Against Women Act of 1994} (VAWA).\textsuperscript{18} For instance, applicants who have filed—or who are recipients of a filing on their behalf—an immigrant visa petition under the VAWA provisions include abused spouses, parents, and children. Immigration services officers said that the effect of delayed case review due to productivity issues surrounding

\textsuperscript{17} Temporary Protected Status is a temporary immigration status granted to eligible individuals from designated countries, such as countries with conditions that prevent the individuals from returning safely.

EDMS can be extremely dire if a VAWA applicant is harmed by an abuser while awaiting adjudication.

OIT and program leadership indicated that users may face difficulties with ELIS and EDMS because these users feel uncomfortable switching from paper-based processes to system-based processes. In addition, since staff may not use ELIS or EDMS on a frequent basis, users may be unaware of new system features, such as the option to load images more quickly in EDMS. Staff members who use the systems infrequently may also have difficulty operating the systems after a delay in use. While ELIS and EDMS program managers communicate information about system changes and provide training to end users, they acknowledged that there may be a need for refresher training for users. Such training would help ensure users are aware of newer system functions and provide opportunities to reacquaint staff with a system they might not use frequently.

IT Reliability

USCIS OIT also faces challenges with system reliability. For example, in May 2013, USCIS launched the Customer Identity Verification Secondary Inspection Tool (CIV SIT) to enhance the integrity of the immigration system and protect applicants from identity fraud. As part of requesting immigration or naturalization benefits, applicants visit one of USCIS’ Application Support Centers to provide their biometric information. USCIS uses this information to help determine eligibility for requested benefits. Applicants visiting a USCIS field office for an interview or to be issued evidence of an immigration benefit, such as temporary travel documents, are required to have their identity biometrically reverified. This identification check entails USCIS staff electronically scanning two fingerprints and taking a picture of the applicant to verify his or her identity. CIV SIT makes it possible to identify applicants by matching the applicant using the two fingerprint scan and picture and comparing the prints and images on file.

However, system failures occurred within the first two hours of CIV SIT’s roll out. Although the system failures occurred at the server, efforts to address the system failures were hampered by hardware problems. An internal USCIS assessment reported hardware problems; for example, three of the four cameras tested for use with CIV SIT had pre-existing compatibility problems. Further, the equipment for CIV SIT was not standardized prior to the system’s release. The variety of types of cameras and scanners at each site, with some sites inheriting second-hand equipment from U.S. Customs and Border Protection, contributed to system reliability issues. Because the type of IT
equipment varied across locations, it was difficult to pinpoint system issues and fixes.

In September 2013, CIV SIT redeployed successfully. However, challenges with CIV SIT continued, and senior staff said that USCIS is considering new solutions. Staff said that CIV SIT sometimes dropped or did not capture key biometric information. As a result, staff must spend time locating the missing information. In one instance, the adjudicator submitted a request for missing information on a Monday and waited until that Thursday for the ultimate resolution. Further, misplaced data and system failure can create a burden for applicants who must wait while staff attempt to find missing information or who have to return to a field office, sometimes several hours away, to repeat their biometric capture.

Infrastructure Planning

A limited IT refresh plan and historical challenges with standardizing and funding IT infrastructure contributed to problems with system functionality and reliability. USCIS OIT has yet to implement a full IT refresh plan that includes workstations, printers, and other IT equipment. Upper level management within USCIS and OIT acknowledged that OIT struggled with refresh planning. Staff with whom we met said that USCIS was too reactive in regards to refreshes and could be more proactive in planning.

OIT has made progress in upgrading hardware; however, challenges remain. For example, USCIS began implementing a Workstation Refresh Program to replace computers that do not meet USCIS standards. In FY 2012 and FY 2013, USCIS replaced more than 6,000 computers. In addition, OIT’s End User Services Division was working on a strategic plan for USCIS to ensure that the computer technology provided to each USCIS employee keeps pace with technological developments and concepts. This plan will involve adopting a 4-year cycle for user level computer replacement. However, some of USCIS’ largest facilities are still waiting for a refresh. As of December 2013, all four service centers, the National Benefit Center, the National Records Center, and the USCIS headquarters program offices in Washington, DC, were awaiting a refresh.

USCIS OIT has made progress in upgrading operating systems and software. In March 2012, 71 percent of USCIS computers could not run Microsoft Office 2010 or Windows 7. As of October 2013, 83 percent of USCIS computers were able to run Office 2010 and Windows 7. However, full implementation has been delayed due to legacy systems that are not compatible with Windows 7. For example, USCIS struggled with migrating to Windows 7 because legacy applications, such
as CLAIMS 3 and CLAIMS 4, are reliant on older operating systems and are incompatible with Windows 7.

USCIS and OIT management are aware of the need for comprehensive infrastructure planning and a formal refresh plan beyond workstations. A USCIS official said that OIT had challenges with producing a plan with dates and milestones for the Windows 7 deployment due to a need for increased coordination between OIT divisions. In addition, members of OIT management said that funding was one of the largest challenges facing the refresh. Historically, definitive replacement cycles have been difficult to establish consistently across USCIS due to budget constraints and disparate funding sources, as well as the decentralized nature in how USCIS field offices had independently procured IT infrastructure. Because IT is so central to USCIS’ operations and ability to fulfill its mission, dated and obsolete technology has a negative effect on productivity, customer service, and support costs.

While delaying refresh may decrease costs in the short run, the delay can increase operational costs in the long run. Outdated infrastructure can lead to higher hardware-based failure rates, increased software conflicts, extended warranty fees, and more staff hours dedicated to end-user support. Because USCIS has historically not had a comprehensive refresh program or a standard baseline of equipment, the agency has accumulated multiple computer configurations. The multiple types of equipment increase the complexity of the IT environment baseline and thus the total cost of ownership. Additionally, IT Security officials told us that infrastructure and security concerns are linked. Outdated infrastructure causes vulnerabilities on USCIS’ internal applications. These vulnerabilities, while not yet exploited, are reflected in the agency’s Federal Information Security Management Act Scorecard.

**IT System Use**

USCIS staff members are not always sure of which systems to use or which systems are available to them to complete business processes. For example, staff members in some locations were not aware that they should be using the Arrival and Departure Information System (ADIS) during the adjudication process. ADIS is a DHS Office of Biometric Identity Management system used to collect and maintain the arrival and departure information of non-U.S. citizens traveling to the U.S. A high level official in the field learned about the value of the system when a Fraud Detection and National Security supervisor brought it to the official’s attention. Senior field officials told us they experienced an increase in customers’ withdrawals of applications for benefits after implementing the use
of ADIS. Due to the increased information adjudicators were able to gather, they had a fuller picture of the applicant.

In addition, some staff members were not aware that they may qualify for access to certain systems, such as the Public Access to Court Electronic Records system operated by the Administrative Office of the U.S. Courts. In one case, a USCIS employee used the account information of a U.S. Immigration and Customs Enforcement employee to access the court electronic records system because the employee did not know it was possible to gain access through USCIS. Other staff members with whom we met were not aware of systems available to them, such as forms editing software or additional background check tools.

Senior field officials with whom we met expressed concern regarding non-standard system use. For example, officials were concerned that if every site is not using the same systems, applicants could travel to different field offices to receive different results. In addition, such as in the case of ADIS, if immigration services officers at different sites are not accessing the same information, officers could be missing information that would help them carry out USCIS’ goal of strengthening the security and integrity of the immigration system.

**Recommendations**

We recommend that the Chief Information Officer, U.S. Citizenship and Immigration Services:

**Recommendation #3:**

Coordinate with the owners of ELIS and EDMS to ensure users are provided with adequate training.

**Recommendation #4:**

Develop and communicate a plan of action and milestones to refresh outdated IT infrastructure, including computers, printers, and software.

**Management Comments and OIG Analysis**

The Acting Deputy Director, U.S. Citizenship and Immigration Services, concurred with our recommendations and provided details on steps being taken to address specific findings and recommendations in the report. We have reviewed
management’s comments and provided an evaluation of the issues outlined in the comments below.

In response to recommendation three, the Acting Deputy Director concurred and stated that coordination and communication between system owners and business owners is crucial to the success of USCIS meeting its mission. The Acting Deputy Director stated that, within USCIS, respective program offices are responsible for training users on the IT systems appropriate for the individual’s job function. However, OIT supports this training by ensuring that user manuals and training documents are up to date. Additionally, OIT can provide demonstrations and training sessions with the program offices to ensure systems are used to their full extent. The Acting Deputy Director said that OIT expects to complete updates to the ELIS and the EDMS user manuals and training documents by November 2014. We recognize this action as a positive step toward addressing this recommendation.

In response to recommendation four, the Acting Deputy Director concurred and stated that since the issuance of our draft report, OIT has made progress in refreshing outdated workstations and peripherals. In the current cycle, OIT is set to complete upgrades at all major Service Centers by August 2014. Additionally, OIT is expanding its Workstation Refresh Strategy 2013–2017 to include infrastructure. The new Technology Refresh Strategy 2014–2018 goes beyond the workstation refresh and also includes a plan of action and milestones for updating all IT hardware and infrastructure. The Technology Refresh Strategy 2014–2018 will be completed by September 30, 2014. We recognize this action as a constructive step toward addressing this recommendation and look forward to hearing more about continued progress in the future.
Appendix A
Objectives, Scope, and Methodology

The DHS Office of Inspector General (OIG) was established by the Homeland Security Act of 2002 (Public Law 107–296) by amendment to the Inspector General Act of 1978. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

As part of our ongoing responsibilities to assess the efficiency, effectiveness, and economy of Departmental programs and operations, we conducted an audit to determine USCIS’ progress in establishing key IT management capabilities to support mission needs.

We researched and reviewed Federal laws, management directives, and agency plans and strategies related to IT systems, management, and governance. We obtained published reports, documents, and news articles regarding USCIS’ management and use of IT. Additionally, we reviewed recent GAO and DHS OIG reports to identify prior findings and recommendations. We used this information to establish a data collection approach that consisted of focused information-gathering meetings, documentation analysis, site visits, and system demonstrations to accomplish our audit objectives.

We held meetings and teleconferences with USCIS staff at headquarters and field offices. Collectively, we met with more than 170 individuals, including headquarters officials, field office staff, and system users, to learn about USCIS IT functions, processes, and capabilities. At headquarters, we met with the USCIS Acting Deputy Director and staff from the Management Directorate, Office of Transformation Coordination, Enterprise Services Directorate, and the Customer Service and Public Engagement Directorate. We met with USCIS OIT officials including the CIO, Deputy CIO, division directors, branch chiefs, and program managers to discuss their roles and responsibilities related to USCIS IT management. We met with staff from OIT offices and divisions, including End User Services, Resource Management, Information Security, Enterprise Infrastructure, and Systems Engineering. In addition, we met with DHS OCIO staff.

We visited USCIS field locations including the California Service Center, the Vermont Service Center, the Western Region Office, the Northeast Region Office, the San Diego District Office, the San Diego Field Office, the Chula Vista Field Office, and the St. Albans Field Office. At USCIS field locations, we met with service center executive staff, regional office management, district office management, field office directors, immigration
services officers, immigration analysts, training and support staff, immigration officers, IT specialists, and other system users to understand IT development practices, user requirements, and system use in the field. We discussed the current IT environment and the extent to which it supports mission needs, local IT development practices, and user involvement and communication with headquarters. We collected supporting documents about the USCIS IT environment, IT management functions, Transformation, other current initiatives, and improvement initiatives.

We conducted this performance audit between September 2013 and February 2014 pursuant to the Inspector General Act of 1978, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

The principal OIG point of contact for this audit is Richard Harsche, Acting Assistant Inspector General for Information Technology Audits and Director of Information Management. Major OIG contributors to the audit are identified in appendix C.
Appendix B
Management Comments to the Draft Report

Memorandum

TO: Richard Harsche
Acting Assistant Inspector General, Office of Information Technology Audits

FROM: Rendell L. Jones
Acting Deputy Director


Thank you for the opportunity to review and comment on the subject Office of the Inspector General (OIG) draft report. In addition to this response, U.S. Citizenship and Immigration Services (USCIS) has separately provided technical and sensitivity comments related to the subject draft report.

The draft report notes that the USCIS Chief Information Officer (CIO) has established key information technology (IT) management capabilities to support USCIS’s mission. These include developing an enterprise architecture and advancing agile methodologies for software development. In addition, since the OIG completed its audit work, USCIS’s Office of Information Technology (OIT) has made progress in addressing some of the issues in the draft report.

For example, OIT has implemented a practice of including staff from all other divisions, as appropriate, at the beginning of any IT project. OIT will create an Integrated Project Team (IPT) for projects to ensure requirements are gathered from all divisions and that roles and responsibilities are clearly defined. For the Enterprise Wireless Project, OIT’s End User Services and the Information Security Divisions provided significant input into the design and implementation of the project. OIT has also improved the performance of the Enterprise Document Management System (EDMS), which the draft report notes had negatively affected adjudicators’ work processes. During the past few months, OIT has added significant features to EDMS that have increased processing speed and new functionality is also being deployed.

The draft report identifies measures USCIS can take to enhance the overall effectiveness of its IT program. Specifically, the OIG recommends that the USCIS CIO take the following steps:

Draft Recommendation 1: Finalize and communicate USCIS’s IT Strategic Plan to ensure that IT supports the mission of USCIS and the Department.

Page 2

Response: USCIS concurs with this recommendation. The draft USCIS OIT Strategic Plan 2013-2017 has been reviewed throughout USCIS and is currently undergoing a final review by the USCIS CIO. USCIS expects to finalize and publish the document by September 30, 2014. At that time, the document will be available on USCIS’s intranet and communicated via USCIS Today, an agency-wide electronic newsletter.

Draft Recommendation 2: Develop and implement a plan of action and milestones to address senior level staffing vacancies including the Chief of Staff, Chief Technology Officer and Chief, Strategic Vendor Management.

Response: USCIS concurs with this recommendation. OIT has made significant progress to address senior level staffing vacancies. OIT has selected a new Chief of Staff, who is currently going through the pre-employment clearance process, and is interviewing candidates for the Strategic Vendor Management position. USCIS is fully committed to filling the positions noted in the OIG recommendation and is on schedule to do so by October 2014.

To ensure that IT systems and services are delivered at a high level of quality and are consistent with the enterprise vision for architecture and practices, OIT created the new Applied Technology Division in May 2014. This new division encompasses the functions of Quality Assurance, Change Control and Release Management, Processes and Practices, Software Asset Management, Enterprise Architecture, and Solution Architecture, which previously were distributed throughout other OIT divisions. The Technology Officer position will also reside in this division. Bringing the functions together into a single division will allow OIT to unify processes, streamline workflows, and make the best use of its contractors.

Draft Recommendation 3: Coordinate with the owners of the Electronic Immigration System (ELIS) and EDMS to ensure users are provided with adequate training.

Response: USCIS concurs with this recommendation. Coordination and communication between the system owner and business owner is crucial to the success of USCIS meeting its mission. Within USCIS, the respective program offices are responsible for training users on the IT systems appropriate for an individual’s particular job function. OIT supports this training by ensuring user manuals and training documentation are up-to-date. In addition, OIT can provide demonstrations and training sessions with the program offices, as requested, to ensure the systems are being used to their full extent. OIT expects to complete its updates to ELIS and EDMS user manuals and training documents by November 2014.

Draft Recommendation 4: Develop and communicate a plan of action and milestones to refresh outdated IT infrastructure, including computers, printers, and software.

Response: USCIS concurs with this recommendation. Since the draft audit report was issued, OIT has made progress in refreshing outdated workstations and peripherals. As of May 2014, workstation refresh has been completed at the Vermont Service Center, California Service Center, Texas Service Center, and National Records Center. In the current cycle, OIT is on
Page 3

schedule to complete refresh at the National Benefits Center and the Nebraska Service Center by August 2014.

In addition, OIT is broadening the scope of the drafted Workstation Refresh Strategy 2013-2017 to include infrastructure. The new Technology Refresh Strategy 2014-2018 expands beyond workstation refresh and incorporates a plan of action and milestones for updating all IT hardware and infrastructure, reflecting a more comprehensive strategy for the organization. The Technology Refresh Strategy will also be completed by September 30, 2014.
Appendix C

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Appendix D
Report Distribution

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