Verification Review of USCIS' Progress in Implementing OIG Recommendations for SAVE to Accurately Determine Immigration Status of Individuals Ordered Deported

Homeland Security

January 18, 2017

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MEMORANDUM FOR: The Honorable León Rodriguez
Director
U.S. Citizenship and Immigration Services

FROM: John Roth *John Roth*
Inspector General

SUBJECT: *Verification Review of USCIS' Progress in Implementing OIG Recommendations for SAVE to Accurately Determine Immigration Status of Individuals Ordered Deported*

We conducted a verification review to assess the United States Citizenship and Immigration Services' (USCIS) progress in implementing recommendations from our report, *Improvements Needed for the SAVE (Systematic Alien Verification for Entitlements Program) to Accurately Determine Immigration Status of Individuals Ordered Deported* (OIG-13-11, December 2012). We periodically conduct verification reviews to evaluate agency progress on selected audit recommendations, including whether corrective actions achieve the intended results.

In our 2012 report, we discussed the results of our review of Systematic Alien Verification for Entitlements (SAVE), a Web-based system that uses the Verification Information System (VIS) to provide almost instantaneous responses to immigrant status inquiries. In summary, we reported that SAVE sometimes provided outdated and erroneous information about an individual's immigration status to assist Federal, state, and local agencies that grant benefits and licenses. Through statistical sampling, we found that nearly one out of eight times, SAVE erroneously verified that an individual had lawful immigration status although the individual had been ordered deported from the United States and was no longer entitled to many government benefits. We determined that the Central Index System, which SAVE accessed to validate an individual's immigration status, was generally not updated when the Immigration Court issued a final decision to deport, remove, or exclude an individual. Instead, immigration status codes in the Central Index System were generally updated after an individual had physically left the country, a process that may take years.

USCIS' progress in implementing our report recommendations. USCIS did not provide formal management comments to this verification review report.

Verification Review Results

Implementation of Recommendation 1

We recommended that USCIS determine what data interfaces are necessary for SAVE to reflect the timely status of individuals who have lost status as a result of a final removal order or expiration of time permitted to file an appeal. In response, USCIS undertook a series of meetings in early 2012 with its counterparts at U.S. Immigration and Customs Enforcement (ICE) and the Department of Justice's Executive Office of Immigration Review (EOIR) to identify the applicable interfaces. USCIS considered several options, including ICE's tracking system for deportable aliens, and EOIR's Immigration Review Information Exchange System (IRIES). Ultimately, USCIS selected IRIES as the system to interface with SAVE because it could provide, immediately and in real time, the status information on each individual subject to final removal. In contrast, ICE's system was unable to process deportable aliens' data as quickly as IRIES and could not provide USCIS with up-to-date information. We closed this recommendation in fiscal year 2013. Our verification review confirmed that all corrective actions have been completed.

Implementation of Recommendation 2

We recommended that USCIS develop an automated interface that would result in SAVE accurately reflecting the immigration status of individuals ordered deported. In June 2016, USCIS reported that the interface between SAVE and IRIES had been successfully tested and deployment had begun.

USCIS experienced initial delays in accomplishing the data interface. Specifically, in October 2013, 10 months after issuance of our report, USCIS reported that it had conducted analyses of the interface between SAVE and IRIES. However, early analysis of the interface test results showed unusually slow response times. Since 2013, USCIS (which is responsible for building the SAVE interface) conducted four additional

performance tests with IRIES, but the tests failed for various reasons. For example:

- IRIES, the web service that EOIR uses to share data with its external Federal Government business partners, could not process the high volume of queries that SAVE requires. An EOIR official informed us that the IRIES web service was not designed to handle approximately 20 million queries expected from SAVE in 2014, not to mention the increased volume expected in subsequent years.
- Department of Justice efforts to modernize its infrastructure further delayed SAVE interface performance testing. According to USCIS officials, EOIR modernization changed the IRIES environment, requiring that USCIS re-code portions of the SAVE interface following a number of test failures.

Ultimately, in June 2016, USCIS officials reported that they had successfully tested the interface between SAVE and IRIES, and it was ready for deployment. USCIS put the interface into production in August 2016. However, USCIS and EOIR are in the process of approving an Interface Control Agreement to be in compliance with OMB Circular A-130, Appendix III. As of early December 2016, USCIS' Office of Information Technology and the Department of Justice's Office of General Counsel were reviewing this agreement. Recommendation 2 will remain open but resolved until we obtain evidence that the Interface Control Agreement has been signed.

Implementation of Recommendation 3

We recommended that USCIS conduct periodic evaluations to validate the accuracy of SAVE initial verification. When a Federal, state, or local entity queries SAVE regarding the immigration status of an individual, SAVE uses VIS to validate the individual's status. This "initial verification" process either 1) confirms that the benefit applicant has immigration status, or 2) prompts the inquiring agency to send the queries for additional manual verification.

During this verification review, we confirmed that USCIS reasonably validated the accuracy of SAVE's initial verification process. Specifically, we learned that on a monthly basis SAVE officials conduct statistical samples of about 64 queries to validate the accuracy of the SAVE initial verification results. This test entails reviewing the individual's status recorded in VIS against information from multiple source systems

containing immigration and entry and exit data.[1] Source systems include, for example, external systems such as IRIES, ICE's Student and Exchange Visitor Information System, U.S. Customs and Border Protection's Arrival and Departure Information System and TECS, as well as USCIS' own internal systems. After receiving October 2014 through May 2016 test results from the USCIS Verification Division, Program Development and Reporting Branch, we determined that the discrepancies identified were statistically insignificant. In addition, a Verification Division quality control official told us that the Program Development and Reporting Branch were able to resolve all potential discrepancies of validation tests performed over the past two years, which resulted in no significant discrepancies. We closed this recommendation in fiscal year 2014. Our verification review confirmed that all corrective actions have been completed.

Implementation of Recommendation 4

Our 2012 audit also recommended that USCIS periodically analyze SAVE initial verification evaluation results to determine whether the system risks verifying other populations erroneously. In October 2013, USCIS provided minutes indicating that it held monthly meetings to discuss initial verification results and to identify potential errors in other populations. We closed this recommendation in 2014 based on the documentation provided.

Our verification review indicated that SAVE officials continue to monitor initial verification results for specific populations that may be at risk of erroneous verification. In addition, the monthly evaluation sample of 64 cases can assist SAVE officials in verifying whether there is a pattern of incorrect verifications.

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[1] VIS contains, or retrieves from data sources, information pertaining to citizenship, immigration, and employment status from data sources including Customs and Border Protection's TECS (not an acronym), and USCIS' Image Storage and Retrieval System, Central Index System, and Computer Linked Application Information Management System.

Objective, Scope, and Methodology

The objective was to perform a verification review to assess the USCIS progress in implementing recommendations from our report, *Improvements Needed for the SAVE (Systematic Alien Verification for Entitlements Program) to Accurately Determine Immigration Status of Individuals Ordered Deported* (OIG-13-11, December 2012).To conduct this verification review, we examined prior management directives and policies. We obtained a basic overview of how USCIS determines what data interfaces are necessary for the SAVE interface to provide accurate results. We inspected appropriate documentation, including the draft interface control agreement and monthly SAVE evaluation reports. We also interviewed SAVE program officials and system engineers, as well as representatives from the Department of Justice's Office of General Counsel and its system engineering departments.

USCIS did not provide formal management comments to this verification review report.

We conducted this verification review between May and July 2016 pursuant to the *Inspector General Act of 1978*, as amended. Major contributors to this report include Tuyet-Quan Thai, Director, Data Analytics and Support Division; and Ann Brooks, Audit Manager.

Please call me with any questions, or your staff may contact Sondra McCauley, Assistant Inspector General, Office of Information Technology Audits at (202) 254-4100.

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