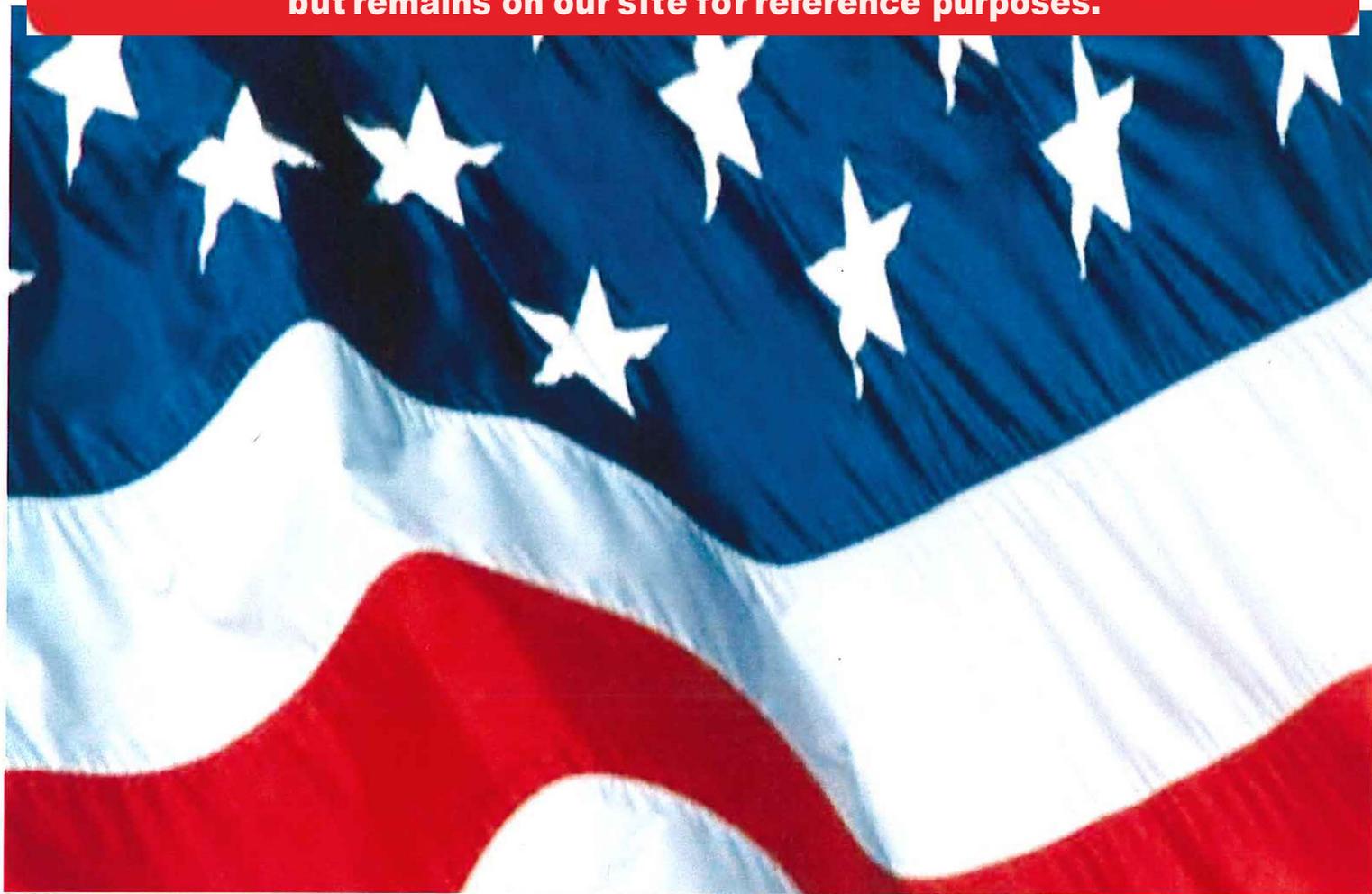


IMPORTANT: This document contains information that is no longer current but remains on our site for reference purposes.



**USCIS Response to the
Citizenship and Immigration Services
Ombudsman's (CISOMB)
2018 Annual Report to Congress**
November 2, 2018



**Homeland
Security**

*U.S. Citizenship and
Immigration Services*

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of the Director (MS 2000)
Washington, DC 20529-2000



U.S. Citizenship
and Immigration
Services

November 2, 2018

Julie Kirchner
Citizenship and Immigration Services Ombudsman
U.S. Department of Homeland Security
Washington, DC 20528

Dear Ms. Kirchner:

Thank you for the information in the 2018 Citizenship and Immigration Services Ombudsman's Annual Report to Congress (Annual Report). I value your thoughtful and comprehensive assessment of U.S. Citizenship and Immigration Services' (USCIS) processes, policies, and operations.

I have reviewed the Annual Report and discussed your findings with my senior leadership team. We appreciate your analysis of the issues that affect our agency's work as we carry out our lawful mission. My team and I concur with many of the findings contained in the Annual Report.

We share your objective to continually improve the quality and efficiency with which we serve individuals who are seeking immigration benefits across all of our programs. Your recognition of our continued efforts to improve our anti-fraud measures and better administer our EB-5 program, and of our commitment to improving our electronic processing through our transformation initiatives is heartening. We acknowledge and appreciate your pointing out the challenges faced by USCIS, including an increased demand for immigration benefits during the reporting period. The Annual Report also noted stakeholder concerns about processing delays and information sharing, and the USCIS response addresses both of these issues and outlines the current steps the agency is taking to improve the quality and speed with which we process benefit requests and inform the public about our work.

USCIS continues to modernize our operations and streamline our adjudications processes to best fulfill our mission. Thank you again for your valuable feedback. I am pleased to present the USCIS response to the Annual Report for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Francis Cissna".

L. Francis Cissna
Director

A Message from the Director

November 2, 2018

It is my pleasure to present the USCIS response to the Office of Citizenship and Immigration Services Ombudsman's (CISOMB) 2018 Annual Report to Congress. Our response addresses concerns raised in the Annual Report and highlights some of the agency's many accomplishments during the reporting period.

In the Annual Report, the Ombudsman noted many of our achievements in the past year, which included:

- Our continued efforts to improve our capacity to process cases electronically to modernize the immigration benefits process;
- Our efforts to strengthen our background check procedures to ensure only eligible applicants receive immigration benefits;
- Our dedication to combatting fraud and abuse and to improving EB-5 program integrity; and
- Our unified effort to reducing our asylum backlog.



The Annual Report also noted many areas within the agency where improvements are warranted, and we are pleased to provide our plans for addressing these concerns. We remain committed to fulfilling our duties to our nation and to those persons seeking immigration benefits.

I am thankful for the Ombudsman's diligence in reviewing the work of USCIS. Through efforts like the Annual Report, we are given an opportunity to step back and consider our achievements while addressing areas that need improvement. This kind of careful self-reflection is essential to progress, and I thank the Ombudsman for her help in moving our agency forward. USCIS, as always, stands ready to work with the CISOMB to ensure we provide the best service possible to our applicants, stakeholders, and the American public.

Sincerely,

A handwritten signature in black ink, appearing to read "LFC", written in a cursive style.

L. Francis Cissna
Director



**USCIS Response to the Citizenship and
Immigration Services Ombudsman's
2018 Annual Report to Congress**

Table of Contents

I.	Legislative Requirement	1
II.	Introduction	1
III.	USCIS Anti-Fraud Initiatives	1
IV.	Transformation	2
V.	Background Checks	5
VI.	Affirmative Asylum Backlog	6
VII.	EB-5 Immigrant Investor Program	7
VIII.	Appendices-Recommendations Update	9
IX.	Conclusion	9
	Appendix A: Acronyms and Abbreviations	11

I. Legislative Requirement

This document responds to the reporting requirements set forth in the *Homeland Security Act of 2002*, codified at 6 U.S.C. § 272, which provides in relevant part:

(f) Responsibilities of Citizenship and Immigration Services—The Director of Citizenship and Immigration Services shall establish procedures requiring a formal response to all recommendations submitted to such director by the Ombudsman within 3 months after submission to such director.¹

II. Introduction

U.S. Citizenship and Immigration Services (USCIS) thanks the Office of the Citizenship and Immigration Services Ombudsman (CISOMB) for the thoughtful, wide-ranging analysis found in its Annual Report for 2018 (Annual Report). USCIS appreciates the Ombudsman’s review of the agency’s operations and welcomes the opportunity to respond to concerns and recommendations found in the Annual Report. This response provides updates to USCIS programs mentioned in the Annual Report and addresses CISOMB’s recommendations for improving USCIS processes. Where appropriate, the response also raises several of USCIS’ accomplishments in improving procedures and applicant services from Fiscal Year (FY) 2017.

III. USCIS Anti-Fraud Initiatives

CISOMB recommended that USCIS expand electronic case filing to facilitate better fraud detection efforts. USCIS’ reasoning and initial steps to address this recommendation are explained below.

Better Support of USCIS Anti-Fraud Initiatives. USCIS is currently expanding online filing of forms and submission of electronic content through the myUSCIS external-facing web portal. The USCIS online case management system—USCIS Electronic Immigration System (ELIS)—is the only system able to receive and process electronic benefit requests through myUSCIS. The agency has doubled the number of applications which can be filed online, and now include Forms I-90, N-400, N-336, and N-565. Work is ongoing for the online electronic versions of Forms N-600 and N-600K, which will be ready for processing in ELIS in 2018. USCIS will continue to expand online filing capabilities by incorporating family-based adjustment of status forms in 2019.

Supporting documents provided by applicants or obtained by USCIS, are currently digitally stored and are reviewed electronically in adjudications when using ELIS. The ability to use Optical Character Recognition (OCR) to convert electronically filed documentation and images into editable and searchable data is not a current development milestone for the USCIS

¹ Pub. L. No. 107-296, 116 Stat. 2135 (2002), *Homeland Security Act of 2002*, online at http://www.dhs.gov/xlibrary/assets/hr_5005_enr.pdf.

modernization project. However, USCIS continues to work to incorporate enhancements in records processing and security checks as they evolve.

IV. Transformation

CISOMB provided USCIS with five recommendations, outlined below, that it felt would improve USCIS Transformation efforts. USCIS concurs with these recommendations. The reasoning and initial steps taken to meet these recommendations are explained below.

- **Increase Engagement with External Stakeholders.** USCIS is committed to expanding its public education and outreach efforts to raise awareness and promote use of all digital tools by applicants and representatives, including online filing and registering for an online account.

During FY 2018, USCIS hosted 14 national and local engagements with nearly 1,400 participants focused specifically on online services, including stakeholder engagements in each of the four USCIS regions. In addition, community relations officers have shared information about USCIS' online tools and resources during hundreds of outreach events with thousands of stakeholders and members of the public.

USCIS is exploring potential changes to the USCIS website to make it easier for users to navigate to the myUSCIS and online filing pages. Also, as USCIS expands ELIS capabilities, we have increased integration with federal partners in U.S. Department of Justice (DOJ), U.S. Department of State (DOS), and other U.S. Department of Homeland Security (DHS) components. Further, USCIS implemented the Federal Bureau of Investigation's (FBI) new Name Check Service. This upgraded feature has decreased background check response time for applicants without a "hit" from 1 to 2 weeks to less than 24 hours. In addition, as DOS has continued its global deployment of electronic immigrant visa packages, USCIS has kept pace and has been able to fluidly transition from processing the paper-based immigrant visa entry packets in ELIS. Current discussions with DOS will support the technological development of functionality enhancements and new interfaces to establish electronic end-to-end processing of the family-based adjustment of status line of business. These changes and enhancements are being coordinated across USCIS and federal immigration partners to achieve technological efficiency and ensure readiness and training of system users.

- **Provide Progress Updates to Stakeholders.** USCIS will continue to expand online filing capabilities as we work toward incorporating the family-based adjustment of status line of business into ELIS in 2019. As part of its ongoing outreach efforts, USCIS notifies stakeholders when an additional form becomes available for online filing.
- **Improve Connectivity to Representative Accounts.** ELIS has offered support for representative accounts since the initial rollout of the electronically filed Form I-90 in 2015, and can accept and associate Form G-28, Notice of Entry Appearance as Attorney or Accredited Representative, filings with all applications currently processed by ELIS. ELIS supports case processing through two channels: Paper filing through the USCIS

Lockbox and online electronic filing through user accounts created on the myUSCIS external portal. On July 18, 2018, USCIS began making updates designed to improve the representative account experience based on feedback from attorneys and accredited representatives. When attorneys or accredited representatives file applications, petitions, or Form G-28 through the USCIS Lockbox, they will receive an online access code that allows them to view their filed cases through myUSCIS. Through the myUSCIS e-filing channel, attorneys and accredited representatives are able to electronically file cases on behalf of applicants and manage those cases in their myUSCIS account.

- **Need to Address Fee Waiver Functionality.** The agency receives applications and petitions via two distinct intake channels: paper applications and petitions via USCIS Lockbox (or “paper intake channel”), and electronic applications and petitions via myUSCIS (or “electronic intake channel”). ELIS already has the capability to digitally process waivers received via both intake channels; however, the only waivers ELIS currently receives are via Lockbox. The Request for Fee Waiver (Form I-912) is received by the Lockbox and approved or denied by USCIS while the application is still at the Lockbox. When a fee waiver is approved, the application is digitally transmitted to ELIS. ELIS processes the fee-waived application, and stores the Form I-912 to reflect that it was fee-waived. The ability to apply for fee waivers online does not currently exist; however, USCIS is aware of stakeholder interest in making fee waiver requests available for electronic filing. As soon as myUSCIS delivers the online version of the waiver, then ELIS will be able to immediately begin digitally processing these waivers.
- **Ensure USCIS is Prepared for More Paperless Processing.** USCIS has continued to expand its paperless environment, and since October 2017 has initiated a paperless approach that relies heavily on electronic processing. For all applications and petitions that are currently processed in ELIS, paper-based filings received by the USCIS Lockbox are scanned and digitally transmitted to ELIS for digital processing. The original paper applications or petitions are not utilized for processing or adjudication. It is important to note that most applicants/petitioners have a very long immigration history that spans several years or decades. In the past these applicants/petitioners filed via paper, so USCIS officers have continued referencing paper A-files in order to view the complete immigration history of applicants. However, today when an applicant files a request for Naturalization (Form N-400), USCIS field offices are now processing and adjudicating these cases exclusively in ELIS. All pre-processing, adjudication, English and civics testing, certificate production, and ceremony management activities for the current Form N-400 application are completed digitally via ELIS. We expect to see an even greater return on investment when USCIS completes development and rollout of the family-based adjustment of status product line in ELIS. With this product line the agency is able to digitally process files submitted from applicants/petitioners much earlier in their immigration lifecycle. We expect to see an increase in online filing once this product line is rolled out, and at that point officers will be able to see an applicant’s/petitioner’s complete immigration history in ELIS. The need to create or reference paper-based A-files goes away when an applicant’s/petitioner’s “official record” resides digitally in ELIS.

Historically, USCIS operations were heavily paper-based, which constrained USCIS in its ability to innovate or streamline its processes. ELIS uses automation and business process re-engineering to make innovative changes in the way USCIS processes applications and petitions for the agency's central lines of business. When ELIS reaches full operating capacity, it will have the necessary functionality to support the processing of:

- Application for Naturalization (Form N-400);
- Application for Replacement of Naturalization/Citizenship Document (Form N-565);
- Request for a Hearing on a Decision in Naturalization Proceedings Under Section 336 (Form N-336);
- Application for Certificate of Citizenship (Form N-600);
- Application for Citizenship and Issuance of Certificate Under Section 322 (Form N-600K);
- Application to Register Permanent Residence or Adjust Status (Form I-485);
- Petition for Alien Relative (Form I-130);
- Petition for Amerasian, Widow(er), or Special Immigrant (Form I-360);
- Petition for Alien Fiancé(e) (Form I-129F);
- Application for Employment Authorization (Form I-765);
- Application for Travel Document (Form I-131);
- Application to Replace Permanent Resident Card (Form I-90);
- Application for Temporary Protected Status (Form I-821);
- Consideration of Deferred Action for Childhood Arrivals (Form I-821D); and
- Notice of Entry of Appearance as Attorney or Accredited Representative (Form G-28).

Together, these filings account for approximately 70 percent of the agency's receipts. Additional functionality may be added as needed. Altogether, USCIS launched a considerable number of ELIS products and capabilities. To date, ELIS has accepted over nine million cases and currently receives and processes almost 40 percent of the agency's annual receipts.

ELIS supports intake and processing of applications and petitions filed through both paper and online filing channels. In addition, the online filing channel expanded to handle more applications in FY 2018, and more will be added through FY 2019. Over 33 percent of the cases received through ELIS were filed online, which supports the agency's efforts to streamline the application process.

Over the past year, USCIS continued to make significant internal adjustments designed to increase productivity, as well as ensure positive and significant progress toward enhancing the reliability, security, and efficiency of ELIS. During 2018, USCIS added Forms N-336 and N-565 to ELIS, enhanced lines of business already in ELIS (i.e., expanded streamlined processing capabilities), vertically expanded existing capabilities to all product lines in ELIS, and introduced several new efficiencies in alignment with the agency's digital initiatives.

Other accomplishments include:

- **Reduced Dependencies Limiting Performance.** Reconfigured ELIS components to remove dependencies in all environments to reduce the frequency of ELIS outages and eliminate system downtime caused by outages of that previously dependent environment.
- **More Reliable, Streamlined Deployments.** Significantly reduced the number of disruptive deployments and improved recovery from error situations, thereby increasing ELIS availability for users and minimizing session time outs.
- **An Expanded ELIS Operations Dashboard to Track Progress of Cases and Status.** USCIS expanded its ELIS Operations Dashboard to include Application to Replace Permanent Resident Card (Form I-90) applications and to report on case status in ELIS, including additional thresholds to support monitoring of cases and task.
- **User-Based Product Delivery Process.** USCIS recently introduced a framework that places users at the center of product design, delivery, and testing. This process uses the USCIS operational directorates to conduct extensive user-based discovery and release planning. During discovery, field office and service center employees partner with the Office of Information Technology to inform requirements collection and refinement, co-design workflow processes and prototypes, and improve those prototypes through iterations of testing and redesign. They also assist in defining and redefining problems, developing physical and digital solutions, and informing development schedules. Usability is an integrated part of the design and delivery process, as new features are prototyped and beta tested with small groups of users in the field. These features are continuously updated based on user feedback before being deployed to the entire population of users.
- **Broadening of Product Development to Provide Stakeholders the Opportunity to Experience the Electronic Filing Environment.** The new product design and delivery process relies on the creation of prototypes to first explore challenges and then to create and iterate on solutions. Prototypes will represent service design solutions and will involve processes and tools in both the physical and digital worlds that work together to address specific case management challenges. Through this iterative design and delivery process, stakeholders will have the opportunity to interact with prototypes before final rollout.

V. Background Checks

CISOMB recommended that USCIS clarify the background check process and how it plays a role in delaying cases in order to improve public confidence in its efforts. This would help assure the public that when the adjudication of cases is delayed, it is for good reason. USCIS concurs with this recommendation. The reasoning and initial steps taken to meet this request are explained below.

Clarifying the Background Check Process. Over the past several years, USCIS's workload has increased substantially, both in volume and complexity. This has placed increasing demands on various aspects of the immigration system, including case adjudicators, who are constantly challenged to balance efficiency and integrity. To address these concerns, USCIS is in the process of exploring the possibility of creating a new, centralized Web page to house all information on background checks. USCIS will review current website content to ensure that it is clear and relevant to applicants and to determine whether there may be any more granular information about the background check process that can be shared publicly. In addition, USCIS will consider the possibility of displaying information through Case Status Online and myUSCIS indicating when USCIS has updated case status to reflect administrative processing of background and security checks.

VI. Affirmative Asylum Backlog

CISOMB recommended that USCIS continue to reduce its affirmative asylum backlog. USCIS agrees that this is a priority and explains its reduction to the backlog approach below.

Further Reducing the Affirmative Asylum Backlog. USCIS has undertaken a range of initiatives to address the backlog and mitigate its consequences for asylum seekers, agency operations, and the integrity of the asylum system. These efforts include: (1) revised scheduling priorities including changing from first-in first-out (FIFO) order processing to last-in first-out (LIFO) order; (2) staffing increases and retention initiatives; (3) acquiring new asylum facilities; (4) assigning refugee officers to assist with asylum workload; (5) conducting remote screenings; and (6) launching a pilot program that extends an interview waiver to pending applicants to expedite cases filed only to access immigration court and request certain kinds of relief available only in immigration courts, such as cancellation of removal for non-lawful permanent residents.

USCIS agrees with the importance of expanding the effort to eliminate the affirmative asylum backlog. The reduction of the backlog remains a primary objective of USCIS, and positive progress has been made in this effort. The LIFO system of scheduling prioritizes the most recently filed affirmative asylum applications when scheduling individuals for asylum interviews. With asylum applicants eligible to obtain employment authorization after the application has been pending for 6 months, giving priority to recent filings allows USCIS to promptly place individuals found ineligible for asylum into removal proceedings well before 6 months have passed. This scheduling approach aims to reduce the incentive to file frivolous or fraudulent applications for asylum solely to obtain employment authorization, and it thereby prevents such cases from continuing to clog the asylum process, both before USCIS and the DOJ Executive Office for Immigration Review (EOIR). This approach also allows USCIS to render decisions on qualified applications in a more efficient manner.

The revised scheduling priorities have reduced the number of new asylum applicants, as anticipated. The effect on new asylum filings was immediate with a 28 percent decrease in asylum filings in the first month, with reductions that have continued to date. The reduction in asylum filings since January has coincided with a significant increase in the number of asylum case completions and has allowed USCIS to complete in some recent months more cases than were accepted for the first time since September 2012. As a result, several individual asylum

offices have seen their number of pending cases decline since January, and the previous month-to-month exponential increase in the overall number of pending asylum applications has been stopped.

USCIS has expanded staffing at asylum offices to keep pace with the significant increase in asylum office workloads. USCIS approved 191 new positions in FY 2018, including 61 asylum officer positions and 14 supervisory asylum officer positions. The equivalent of an average of 100 refugee full-time officers were detailed to assist in asylum processing throughout the fiscal year. Refugee officer deployments in FY 2018 have been instrumental in supplementing staffing, which has aided the successful implementation of the revised LIFO asylum scheduling priorities. The largest refugee officer deployments have been to offices where receipt volumes are particularly high, especially at offices in Houston, Texas; Los Angeles, California (located in Anaheim); Miami, Florida; and Arlington, Virginia.

USCIS successfully launched a pilot program to address applicants who appear to be using the asylum program as a route to immigration court to request cancellation of removal for non-lawful permanent residents. As noted in the Annual Report, USCIS initially notified 1,500 applicants of an option to voluntarily waive their asylum interviews and proceed directly to EOIR. Of this first round, just over 20 percent of the recipients voluntarily accepted interview waivers. Those cases were quickly and efficiently moved from USCIS to immigration court. Of the applicants in the first round who did not waive their asylum interview, over 1,000 have been interviewed on an expedited track, with nearly all of those completed resulting in referrals to immigration court.

In August 2018, USCIS built on the momentum of the pilot project by issuing another round of waiver offers to applicants with the longest-pending and untimely filed Forms I-589, Applications for Asylum and for Withholding of Removal, in each jurisdiction. This second round will provide USCIS with further data to identify factors that may correlate to a higher or lower acceptance rate of the interview waiver. It is anticipated that this second round will achieve a higher acceptance rate due to the increased awareness of the pilot among advocacy and immigrant communities.

VII. EB-5 Immigrant Investor Program

CISOMB recommended that USCIS continue to strengthen the integrity of the EB-5 Immigrant Investor Program. It stated that the extent of the investment and job creation through the EB-5 Program has been the subject of debate. Additionally, the Ombudsman advises that as usage of the EB-5 Program has grown, stakeholders, including members of Congress, have increasingly voiced concerns regarding program integrity, possible exploitation of foreign investors, and the potential for EB-5 investors to use funds from unlawful sources. USCIS acknowledges that there are indications that the program has been used to undermine our national security.

In FY 2018, the Immigrant Investor Program Office's Fraud Detection and National Security Division (IPO FDNS) produced an assessment of the national security concerns within the EB-5 Program from calendar years 2011 to 2015. The study identified 19 cases of confirmed national security concerns in those 5 years. IPO FDNS concluded that, though cases of national security

concern exist, the EB-5 Program is not a substantial gateway for individuals with national security concerns to seek to actually obtain immigration benefits. IPO FDNS found that the restructuring of the EB-5 Program has led to better training of adjudications staff and a dramatic improvement in vetting, researching, and resolution of national security concerns. We have also seen cases of fraud taint the program and undermine public trust.

Strengthening the Integrity of the EB-5 Immigrant Investor Program. USCIS has implemented solutions and programmatic adjustments to enhance the integrity of the EB-5 Program. USCIS has sought to address concerns through a range of reforms, including proposing regulations that would, among other things, enhance oversight of the Regional Center Program, increase minimum investment amounts, and reform the Targeted Employment Area (TEA) designation standard and process. DHS received comments on each of the proposed changes and is considering those comments carefully, as part of the rulemaking process. In addition, CISOMB recognized that USCIS has directed additional resources to EB-5 compliance activities, including the expanded use of site visits and compliance reviews. The Ombudsman further noted that USCIS has worked closely with other regulatory and law enforcement agencies to decrease criminal and civil abuses. For example:

- USCIS expanded its security checks to cover both regional center business entities and individuals participating in the program, and entered into a memorandum of understanding with the Financial Crimes Enforcement Network (FinCEN) to further expand access to FinCEN's holdings and services. USCIS also partnered with other federal agencies including the U.S. Securities and Exchange Commission, the FBI, and U.S. Immigration and Customs Enforcement to strengthen the EB-5 Program.
- In FY 2017, USCIS published revised forms to enhance our data collection to improve vetting of regional centers, regional center principals, and individual petitioners. USCIS also increased application and petition fees to support these enhanced vetting and compliance efforts.
- USCIS created a Compliance Division to review all regional centers' annual certifications (Form I-924A), which are filings to ensure continued eligibility for designation. This new division conducts regional center compliance reviews and initiates the process to terminate the designations of regional centers that fail to maintain their continued eligibility for designation under the regulations. In the first 21 years of the program, USCIS and legacy Immigration and Naturalization Service (INS) terminated only five regional center designations. By contrast, USCIS has terminated over 230 regional centers in just the past five years.
- To highlight a recent successful collaboration, USCIS in February 2018 worked with the FBI and the U.S. Attorney's office in Los Angeles to investigate and ultimately terminate the status of a regional center for failure to promote economic growth. Additionally, two individuals associated with the regional center were indicted on eight counts including conspiracy to commit immigration and wire fraud.

The Ombudsman also noted public criticism about TEA gerrymandering, which has concentrated investments in wealthy urban areas rather than rural and high-unemployment areas as originally intended. USCIS has sought to address these concerns and others, including through issuance of a Notice of Proposed Rulemaking (NPRM) in January 2017. Specifically, the proposed regulation would eliminate the ability of a state to designate certain geographic and political subdivisions as high-unemployment areas; instead, DHS would make such designations directly.

In the past, reliance on a state's TEA designation has resulted in inconsistency and the acceptance of some TEAs that consist of areas of relative economic prosperity linked to areas with lower employment, resulting in gerrymandered boundaries. Under the proposed rule, these specially designated high unemployment areas would be designated by DHS and consist only of the census tract(s) in which the new commercial enterprise is principally doing business together with any contiguous census tract(s). DHS received comments on the proposed changes in the NPRM and is considering those comments carefully, as part of the rulemaking process.

USCIS will continue to evaluate and address issues related to the EB-5 program to ensure the effective administration of this program.

VIII. Appendices-Recommendations Update

Under the statutory requirements, CISOMB makes recommendations to the USCIS Director, as appropriate. On December 21, 2016, former Ombudsman Maria Odom issued a recommendation to improve the Central American Minors (CAM) Refugee/Parole Program. The recommendation included the following:

- Increase the volume of interviews and associated Refugee Access Verification Unit (RAVU) processing of CAM cases;
- Permit access to counsel in CAM interviews;
- Create a plain language, comprehensive CAM "Information Guide"; and
- Publish and regularly update CAM case processing times.

Consistent with Executive Order 13767, 82 FR 8793 (January 30, 2017), USCIS stopped offering parole through the CAM program on August 16, 2017. In accordance with the Annual Report to Congress on the U.S. Refugee Admissions Program announcing that the CAM Refugee Program would be phased out in FY 2018, USCIS stopped accepting new CAM refugee applications on November 9, 2017, and stopped interviewing CAM refugee applicants on January 31, 2018. USCIS is currently defending litigation regarding termination of the CAM parole program. Accordingly, USCIS is not considering the recommended changes at this time.

IX. Conclusion

USCIS appreciates the Ombudsman's efforts in drafting its 2018 Annual Report and appreciates the opportunity to review our progress as an agency and identify further refinements we can make to our operations. USCIS remains committed to performing our lawful function of adjudicating requests for benefits submitted by applicants and petitioners and providing

exemplary service to those applicants and petitioners and their representatives, as well as to internal and external stakeholders at all levels of government.

As this response notes, USCIS agrees with many of the concerns and recommendations found in the Annual Report and is taking action to address these issues. These include:

- Working to further enable online filing of applications and submission of electronic content through the myUSCIS web portal;
- Exploring the possibility of creating a new, centralized Web page to house all information on background checks;
- Reviewing current website content on background checks to ensure that it is clear and relevant to applicants and petitioners;
- Considering the possibility of displaying information through Case Status Online and myUSCIS to indicate when USCIS has updated case status to reflect administrative processing of background and security checks;
- Revising scheduling priorities, increasing staffing and facilities, and implementing new programs targeted to reduce asylum case processing times and backlog; and
- Continuing efforts to improve the administration and integrity of the EB-5 Program.

USCIS strives to be the best agency it can be, both for our nation and the people we serve. USCIS greatly appreciates CISOMB's comprehensive and thoughtful evaluation of our operations and recommendations for improvement thereof. We look forward to future collaboration with CISOMB.

Appendix A: Acronyms and Abbreviations

CAM	Central American Minors
CISOMB	Office of the Citizenship and Immigration Services Ombudsman
DHS	Department of Homeland Security
DOJ	Department of Justice
DOS	Department of State
ELIS	Electronic Immigration System
EOIR	Executive Office for Immigration Review
FBI	Federal Bureau of Investigation
FIFO	First-In First-Out
FinCen	Financial Crimes Enforcement Network
INS	Immigration and Naturalization Service
IPO	Immigrant Investor Program Office
IPO FDNS	IPO's Fraud Detection and National Security Division
LIFO	Last-In First-Out
NPRM	Notice of Proposed Rulemaking
OCR	Optical Character Recognition
RAVU	Refugee Access Verification Unit
TEA	Targeted Employment Area
USCIS	U.S. Citizenship and Immigration Services