



H-1B and L-1A Compliance Review Site Visits

Fraud Detection and National Security
Compliance Review Data
(October 1, 2012, to September 30, 2016)

January 17, 2018
Fiscal Year 2017 Report to Congress



**Homeland
Security**

*U.S. Citizenship and Immigration
Services*

Message from the Director

January 17, 2018

I am pleased to present the following report, “H-1B and L-1A Compliance Review Site Visits, Fraud Detection and National Security Compliance Review Data (October 1, 2012 to September 30, 2016),” which has been prepared by U.S. Citizenship and Immigration Services (USCIS).

This report was compiled pursuant to the language set forth in Senate Report 114-264, accompanying the Fiscal Year 2017 Department of Homeland Security Appropriations Act (P.L. 115-31).

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable John R. Carter
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable John Boozman
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jon Tester
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

If you have any questions, please do not hesitate to contact me at (202) 272-1000 or the Department’s Deputy Chief Financial Officer, Stacy Marcott, at (202) 447-5751.

Sincerely,



L. Francis Cissna
Director
U.S. Citizenship and Immigration Services



Executive Summary

This report responds to the Senate Appropriations Committee’s request for information on H-1B and L-1A visa compliance review site visits by USCIS. The report includes totals, localities, and outcomes of site visits, and the number of site visits that warranted referral to U.S. Immigration and Customs Enforcement (ICE).

The H-1B nonimmigrant visa classification allows qualifying foreign nationals to reside temporarily in the United States and work in a specialty occupation, provide services of an exceptional nature relating to a Department of Defense cooperative research and development project, or work as a fashion model of distinguished merit or ability. The L-1A nonimmigrant classification allows a U.S. employer to transfer an executive or manager from one of its affiliated foreign offices to one of its U.S. offices. This classification also allows a foreign company that does not have an affiliated U.S. office yet to send an executive or manager to the United States with the purpose of establishing a new office.

USCIS’s Fraud Detection and National Security (FDNS) Directorate conducts compliance reviews on randomly selected H-1B and L-1A petitions after they have been approved. Since 2009, FDNS has administered the Administrative Site Visit and Verification Program (ASVVP), which bolsters the compliance review process with unannounced site visits. The ASVVP includes site visits of H-1B, L-1A, religious workers, and, starting in FY 2016, EB-5 petitioners. This report analyzes data related to only H-1B and L-1A visa holders.

This report covers the period from October 1, 2012, to September 30, 2016. During those 4 years, FDNS completed a total of 30,786 H-1B and 4,676 L-1A compliance review site visits, as broken down by USCIS region in the following table.

<i>H-1B and L-1A Compliance Review Site Visits, FY 2013 to FY 2016</i>				
Region	H-1B Compliance Reviews	Percent of total	L-1A Compliance Reviews	Percent of total
Central	9,558	31	1,146	24
Northeast	10,525	34	1,531	33
Southeast	4,530	15	692	15
Western	6,137	20	1,301	28
Undesignated locations*	36		6	
Totals	30,786	100	4,676	100
*Because of the data extraction techniques and limitations, we were unable to confirm from the extracted data the worksite location for a small number of compliance reviews.				

Of the 30,786 H-1B compliance reviews, USCIS determined that 26,975 (88 percent) were compliant and 3,811 (12 percent) were noncompliant. Of the 4,676 L-1A compliance reviews, USCIS determined that 4,157 (89 percent) were compliant and 519 (11 percent) were noncompliant.

Compliant means that the petitioner and the beneficiary are not in violation of the terms of the petition. Noncompliant means that the petitioner is in violation of the terms of the petition or that the beneficiary is in violation of the terms of the visa classification. FDNS may pursue a noncompliant case through an administrative investigation, or, if criminal activity or national security risks are suspected, refer the case to ICE or another government agency.

H-1B and L-1A compliance reviews led to seven referrals to ICE for criminal investigation between FY 2013 and FY 2016. Multiple forms and visa classes may be associated with a single referral to ICE. Noncompliant cases that do not meet the threshold for a criminal referral are returned to the adjudications unit to take appropriate administrative action.

The 30,786 H-1B compliance reviews from October 1, 2012, to September 30, 2016, represent a decrease of 17,323 from the previous report covering October 1, 2011, to September 30, 2015. (L-1A compliance review site visits were introduced in FY 2014.)

This decrease reflects several factors, including a disproportionately high number of site visits during the first year covered by the previous report. In FY 2012, contract site inspectors and newly hired level 1, General Schedule (GS) 5/7/9, immigration officers conducted the site visits. They conducted 23,451 site visits in FY 2012, or nearly half of all 48,109 completed from FY 2012 to FY 2015.

After FY 2012, FDNS began transitioning ASVVP from contract site inspectors. The program now uses only immigration officers. Officers conduct a more robust—and more time-intensive—process of screening cases using a variety of systems and law enforcement databases. The volume of compliance reviews also was affected by the need to train the officers in using a new standard operating procedure and new software, and by high attrition rates. Attrition has remained a concern, leading FDNS in FY 2016 to add a higher position at the GS-11 grade to supplement fraud detection efforts by promoting career growth and retention in the program.



H-1B and L-1A Compliance Review Site Visits Fraud Detection and National Security Compliance Review Data (October 1, 2012, to September 30, 2016)

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I. Legislative Language

This document has been compiled in response to language in Senate Report 114-264, accompanying the Fiscal Year (FY) 2017 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-31).

Senate Report 114-264 includes the following:

The Committee is disappointed that USCIS has not provided the H-1B and L reports required in Senate Report 144-168 [*sic*], especially as one of the reporting requirements was simply to describe enforcement goals and the action plan for compliance visits. The Committee directs USCIS to continue reporting on compliance, as described in Senate Report 144-168 [*sic*], on an annual basis.

Senate Report 114-68 includes the following:

Within 90 days of the enactment of this act, the Committee directs USCIS to report on how many H-1B and L compliance review site visits have been conducted over the past 4 years, as a percentage of total of active petitioners and visa beneficiaries, including the localities in which the visits have been performed, the outcomes of the site visits, including when petitioners or beneficiaries have requested that the review be terminated, and when cases were referred to ICE.

II. Background

U.S. Citizenship and Immigration Services (USCIS) processes immigration benefit requests, including petitions for nonimmigrant workers and other employment-based benefits. The Fraud Detection and National Security (FDNS) Directorate collects information to help determine if petitioners and beneficiaries are complying with applicable immigration laws and regulations.

In July 2009, FDNS established the Administrative Site Visit and Verification Program (ASVVP) to conduct unannounced site visits to verify information provided to USCIS in various visa classifications. The agency's Benefit Fraud and Compliance Assessment program had recommended that physical site inspections would be a valuable fraud detection tool.

For the H-1B and L-1A classifications, compliance review site visits are conducted post-adjudication, meaning after USCIS approves the petitions. The work locations are selected randomly, rather than being targeted as part of an administrative investigation into suspected fraud. In April 2017, USCIS launched a more targeted approach when making site visits to H-1B petitioners and the worksites of H-1B employees. This new approach is part of increased measures against fraud and abuse in that classification.

The compliance review process includes a review of public records and information, a review of the petition and accompanying evidence, interviews with the petitioner and beneficiary, and findings from the site visit. The objectives include verifying whether the beneficiary is working in the location, being paid the salary, and performing the duties stated in the petition. There also may be follow-up questions by phone and email.

Cooperation during a site visit is voluntary. The petitioner or the beneficiary may decline or discontinue participation at any time. If that happens, FDNS immigration officers will leave and note in their report that the site visit was terminated at the request of the petitioner or beneficiary.

If a case is found to be noncompliant—meaning not in compliance with the terms of the petition or the visa classification—FDNS may pursue an administrative investigation. If criminal activity or national security risks are suspected, FDNS may refer the case to U.S. Immigration and Customs Enforcement (ICE) or to another law enforcement agency for criminal investigation.

III. Compliance Review Data Report

Senate Report 114-264 accompanying the FY 2017 DHS Appropriations Act (P.L. 115-31) specifically requested data reports regarding ASVVP performance during the past 4 years. In response, USCIS compiled relevant data from October 1, 2012, to September 30, 2016. This report encompasses an analysis and discussion of the requested data.

Analysis/Discussion

A. H-1B and L-1A compliance review site visits that have been conducted over the past 4 years

For this report, USCIS defines “have been conducted” to mean completed during the period. Any incomplete cases pending final review or follow-up as of September 30, 2016, are not included.

This analysis also excludes compliance reviews with a substatus of “No Site Check Conducted” because the visit was canceled. Site visits can be canceled for reasons such as the petitioner’s withdrawal of the petition or the beneficiary’s adjustment of status to lawful permanent resident. They also can be canceled because of an active investigation or officer safety concerns. Site visits can be waived by a supervisory immigration officer—for example, if a work location for a petitioner was subject to a site visit within the last 2 years.

Table 1 shows H-1B and L-1A compliance review site visits completed in FY 2013 to FY 2016.

Table 1

<i>H-1B and L-1A Compliance Review Site Visits Completed: FY 2013 to FY 2016</i>					
Compliance Review Type	2013	2014	2015	2016	Totals
H-1B	9,060	10,658	4,940	6,128	30,786
L-1A		487	1,986	2,203	4,676
Totals	9,060	11,145	6,926	8,331	35,462

Source: FDNS Data System (FDNS-DS), October 2016.

Note: Excludes substatus of “No Site Check Conducted.”

When ASVVP launched in July 2009, the program initially focused on H-1B compliance reviews. In August 2013, the DHS Office of Inspector General released its report, OIG-13-107, “Implementation of L-1 Visa Regulations.” That report recommended a site visit before employers file a petition to extend the initial period of stay of 1 year granted to L-1A

nonimmigrants admitted to open, or be employed in, a new U.S. office.¹ USCIS concurred and incorporated L-1A compliance reviews into the program during FY 2014.

Both contract site inspectors and level 1 immigration officers conducted site visits during the period of FY 2012 through the first quarter of FY 2014, when the site inspector contract ended.

In FY 2015, H-1B compliance review completions dropped for two main reasons:

- Transition to new software, the Workload Balancer, to streamline the ASVVP’s intake and assignment process; and
- Implementation of a revised standard operating procedure for the program, which required updated training for all officers.

B. H-1B and L-1A compliance reviews completed over the past 4 fiscal years as a percentage of total approved petitions

Employers use Form I-129, Petition for a Nonimmigrant Worker,² to petition USCIS for a foreign national to come temporarily to the United States to perform services or labor or to receive training. Each Form I-129 petition in the H-1B or L-1A nonimmigrant classification identifies one petitioner and one beneficiary.

Table 2 shows the number of site visits completed as a percentage of total active petitioners/beneficiaries based on the number of petitions approved during that fiscal year.

Table 2

<i>H-1B and L-1A Compliance Review Site Visits as Percentage of Total Approved Petitions: FY 2013 to FY 2016</i>					
Compliance Review Type	2013	2014	2015	2016	Totals
Total H-1B Site Visits	9,060	10,658	4,940	6,128	30,786
Total H-1B Petitions Approved	286,773	315,857	275,317	345,262	1,223,209
<i>Site Visits as Percentage to Total Petitions Approved</i>	3.2	3.4	1.8	1.8	2.5

Compliance Review Type	2013	2014	2015	2016	Totals
Total L-1A Site Visits	-	487	1,986	2,203	4,676
Total L-1A Petitions Approved	-	19,950	22,609	23,472	66,031
<i>Site Visits as Percentage to Total Petitions Approved</i>	-	2.4	8.8	9.4	7.1

Source: FDNS-DS, October 2016; Office of Performance and Quality, October 2016.

Note: A site visit might or might not take place within the same fiscal year that the corresponding petition was approved.

¹ “New office” means an organization that has been doing business in the United States through a parent, branch, affiliate, or subsidiary for less than 1 year, 8 CFR 214.2(l)(1)(ii)(F). New office petitions may be approved for a period not to exceed 1 year, 8 CFR 214.2(l)(7)(i)(A)(3). Evidentiary requirements specific to new office petitions filed on behalf of L-1A nonimmigrant managers or executives are found at 8 CFR 214.2(l)(2)(v).

² Available at <https://www.uscis.gov/i-129>.

From October 1, 2012, to September 30, 2016, a total of 1,233,209 H-1B petitions were approved. FDNS conducted a total of 30,786 H-1B site visits, or 2.5 percent of the total active H-1B petitions.

FDNS started compliance review site visits on L-1A petitions in FY 2014. From October 1, 2013, to September 30, 2016, a total of 66,031 L-1A petitions were approved. FDNS completed a total of 4,676 L-1A compliance reviews, or 7.1 percent of the total active L-1A petitions.

C. Localities in which the site visits have been performed

In FY 2012, USCIS developed a new methodology to improve efficiency in distributing the ASVVP workload across field offices. This change shifted workflow management from the fraud detection units at service centers (under the Service Center Operations Directorate) to the agency’s regional offices (under the Field Operations Directorate).

The regional offices now oversee the program at the field level, which may involve several field offices within a region sharing the workload as a team. The regional offices then report the results back to the service centers for final evaluation by their fraud detection unit.

Table 3 shows³ H-1B compliance review site visits by USCIS region based on the beneficiary worksite address:

Table 3

<i>H-1B Compliance Review Site Visits by USCIS Region Based on Beneficiary Worksite Address: FY 2013 to FY 2016</i>						
Region	2013	2014	2015	2016	Totals	% of Completed Site Visits
Central	2,760	3,119	1,891	1,788	9,558	31%
Northeast	3,237	3,900	1,482	1,906	10,525	34%
Southeast	1,148	1,601	690	1,091	4,530	15%
Western	1,899	2,026	872	1,340	6,137	20%
Undesignated location*	16	12	5	3	36	
Totals	9,060	10,658	4,940	6,128	30,786	

*Because of the data extraction techniques to identify address information, the beneficiary worksite address was unable to be pulled for a small number of site visits.

Source: FDNS-DS, October 2016.

³The results exclude site visits with a status of “No Site Check Conducted” and site visits that were missing receipt numbers. The results include the most recent worksite addresses where the petitions and supporting documents indicated that the beneficiaries were performing H-1B or L-1A duties.

Table 4 shows L-1A compliance review site visits by USCIS region based on beneficiary worksite address:

Table 4

<i>L-1A Compliance Review Site Visits by USCIS Region based on Beneficiary Worksite Address: FY 2013 to FY 2016</i>						
Region	2013	2014	2015	2016	Totals	% of Completed Site Visits
Central	-	95	500	551	1,146	24%
Northeast	-	299	853	379	1,531	33%
Southeast	-	42	212	438	692	15%
Western	-	51	417	833	1,301	28%
Undesignated location*	-	-	4	2	6	
Totals	-	487	1,986	2,203	4,676	

*Because of the data extraction techniques to identify address information, the beneficiary worksite address was unable to be pulled for a small number of site visits.

Source: FDNS-DS, October 2016.

D. Outcomes of the Compliance Reviews

The fraud detection unit at a service center reviews the results of the compliance reviews and makes a determination on the basis of the site visit results and any additional information gathered during the final review:

- “Compliant” means that the petitioner and beneficiary are not in violation of the terms of the petition and visa classification.
- “Noncompliant” means that the petitioner is in violation of the terms of the petition or that the beneficiary is in violation of the terms of the visa classification.

Table 5 shows the outcomes of H-1B and L-1A compliance reviews:

Table 5

<i>Outcomes of H-1B and L-1A Compliance Reviews Site Visits: FY 2013 to FY 2016</i>					
Outcome	2013	2014	2015	2016	Total
<i>H-1B</i>					
Compliant	7,706	9,429	4,425	5,415	26,975
Noncompliant	1,354	1,229	515	713	3,811
Total	9,060	10,658	4,940	6,128	30,786
<i>L-1A</i>					
Compliant	-	428	1,782	1,947	4,157
Noncompliant	-	59	204	256	519
Total	-	487	1,986	2,203	4,676

Source: FDNS-DS, October 2016.

Note: Excludes substatus of “No Site Check Conducted.”

Of the 30,786 H-1B compliance reviews completed, USCIS determined that 26,975 (88 percent) were compliant, while 3,811 (12 percent) were noncompliant. Of the noncompliant reviews, 53 percent of those petitions were revoked. An additional 15 percent of the approved petitions have an ordered Notice of Intent to Revoke (NOIR).

Of the 4,676 L-1A compliance reviews completed, USCIS determined that 4,157 (89 percent) were compliant, while 519 (11 percent) were noncompliant. Of the noncompliant reviews, 39 percent of those petitions were revoked. An additional 12 percent of the approved petitions have an ordered NOIR.

If an immigration officer finds a petitioner or beneficiary to be noncompliant, the Center Fraud Detection Unit (CFDO) at the service center then assesses the case for fraud indicators. If no fraud indicators are found, the petition goes to an immigration services officer to resolve outstanding issues or to pursue adverse actions, such as revocation of an immigration benefit.

If the CFDO finds substantive and articulable fraud indicators, the case becomes subject to administrative investigation and may be referred for criminal investigation. See Section F below.

E. Outcomes of the site visits indicating when the petitioner or the beneficiary requested to terminate the interview

In cases with unwilling participants, the immigration officer conducting the site visit states on the report that the site visit was terminated at the request of the petitioner or the beneficiary, or both. Such unwillingness may lead to USCIS follow-up actions, such as issuance of a Request for Evidence, a Notice of Intent to Deny a petition, or a NOIR.

From FY 2013 to FY 2016, information on site visits terminated by request was not recorded consistently in the FDNS Data System. However, FDNS recently has developed the capability to better record these instances for future reporting.

F. Referrals to ICE

If the fraud detection unit at a service center identifies fraud indicators, FDNS elevates the “compliance review” status to “case” status to be pursued as an administrative investigation. This includes looking for violations of section 212(a)(6)(C)(i) of the Immigration and Nationality Act (fraud or willfully misrepresenting a material fact) and any other grounds of inadmissibility or removability.

During an administrative investigation, FDNS may uncover evidence of criminal conduct, public safety threats, or national security concerns. In those instances, FDNS refers the case to ICE or other government agencies for criminal investigation. H-1B and L-1A compliance reviews led to a total of seven referrals to ICE from FY 2013 to FY 2016. Multiple forms and visa classes may be associated with a single referral to ICE.

If a referral to ICE or other agency is declined, FDNS then will continue the administrative investigation, which may identify grounds to deny or revoke an immigration benefit and/or initiate removal proceedings.

IV. Conclusion/Prospective Plans

To help ensure compliance in select visa classifications, USCIS implemented the ASVVP in 2009, initially authorizing FDNS to conduct unannounced site visits on randomly selected H-1B visa petitions. Randomly selected L-1A visa petitions were added in FY 2014. From FY 2013 to FY 2016, FDNS completed a combined total of 35,462 H-1B and L-1A compliance reviews. USCIS determined that 31,132 (88 percent) were compliant and 4,330 (12 percent) were noncompliant. Noncompliant cases with no suspected fraud are referred to the adjudications unit for further processing of the petition, while cases with fraud indicators are subject to administrative investigation and possible criminal referral.

Compliance reviews continue to play an important and growing role in USCIS's efforts to deter and detect fraud and to enhance the integrity of the immigration system.

Other USCIS Initiatives

Although outside the immediate scope of this report, USCIS has taken a number of recent initiatives to enhance the agency's ability to target fraud.

In response to Executive Order 13767 titled "Border Security and Immigration Enforcement Improvements," then-DHS Secretary John Kelly on February 20, 2017, instructed the heads of USCIS, U.S. Customs and Border Protection, and ICE to review fraud detection, deterrence, and prevention measures and to provide a consolidated report regarding fraud vulnerabilities in the asylum and benefits adjudication processes. The Secretary's implementation memo also specifically instructs USCIS to "increase the operational capacity of the Fraud Detection and National Security (FDNS) Directorate and continue to strengthen the integration of its operations to support Field Operations, Refugee, Asylum and International Operations, and Service Center Operations Directorate, to detect and prevent fraud in the asylum and benefits adjudication processes ..." (See the February 20, 2017, memorandum titled, "Implementing the President's Border Security and Immigration Enforcement Improvements Policies," at section I, pp. 7-8.)⁴

Additionally, on April 18, 2017, the President issued an executive order on Buy American and Hire American. Section 5(a) directs that "the Secretary of State, the Attorney General, the Secretary of Labor, and the Secretary of Homeland Security shall ... propose new rules and issue new guidance, to supersede or revise previous rules and guidance if appropriate, to protect the interests of United States workers in the administration of our immigration system, including through the prevention of fraud and abuse." Section 5(b) addresses the H-1B visa program by directing the Secretary of State, the Attorney General, the Secretary of Labor, and the Secretary of Homeland Security to "suggest reforms to help ensure that H-1B visas are awarded to the most-skilled or highest-paid petition beneficiaries."

⁴ Available at https://www.dhs.gov/sites/default/files/publications/17_0220_S1_Implementing-the-Presidents-Border-Security-Immigration-Enforcement-Improvement-Policies.pdf.

Under this mandate, USCIS announced in April 2017 that it will take a more targeted approach to combating H-1B petitioner fraud and abuse. As part of the new approach and in addition to ASVVP, USCIS is in the process of establishing the Targeted Site Visit and Verification Program (TSVVP). TSVVP initially will focus on petitioning entities where:

- USCIS cannot validate the employer's basic business information through commercially available data;
- H-1B-dependent employers (those who have a high ratio of H-1B workers as compared to U.S. workers, as defined by statute); and
- Employers petitioning for beneficiaries who work offsite at another company or organization's location.

TSVVP referrals contain specific guidance on what to look for during the site visit. Immigration officers have access to a set of questions categorized along different scenarios. These targeted site visits will allow USCIS to focus resources where fraud and abuse of the H-1B program may be more likely to occur. During the inaugural April 2017 TSVVP pilot, immigration officers conducted 140 site visits across the country and found suspected fraud concerns in a number of the visits that are now under CFDO review. In addition, starting in the first quarter of FY 2018, USCIS is expanding TSVVP efforts by conducting targeted site visit pilots of post-adjudication L-1B petitions (Intracompany Transferee with Specialized Knowledge). The pilots include 300 L-1B petitions filed by companies that place their workers at offsite locations. The results of the pilots will be used in conjunction with additional research efforts to create a broadly scoped, permanent TSVVP program that we expect to include L1-B applications.

FDNS immigration officers also conduct site visits based on potential fraud indicators identified in the USCIS system VIBE (Validation Instrument for Business Enterprises). VIBE uses commercially available data from an independent information provider to validate basic information about companies or organizations petitioning for certain foreign national workers. The purpose of the site visit is to validate the petitioner's existence, operational status, eligibility, and business viability when VIBE cannot verify and resolve the data discrepancies.

To provide the public with a direct method of reporting suspected issues, USCIS also has established an email address, reporth1babuse@uscis.dhs.gov, for public tips about potential H-1B fraud and abuse. Similarly, a new tip line, reporth2babuse@uscis.dhs.gov, also has been established to report abuse and employer violations in the H-2B temporary nonagricultural worker program.

Although site visits are a valuable anti-fraud strategy, they are also resource intensive. USCIS has identified a need for additional staffing resources to support expansion of its site visit programs. The FY 2018 President's Budget submission includes funds to build the additional capacity necessary to carry out the directives of the President and the DHS Secretary in fighting immigration fraud and protecting American workers.

Appendix

Abbreviation	Explanation
ASVVP	Administrative Site Visit and Verification Program
CFDO	Center Fraud Detection Unit
DHS	Department of Homeland Security
FDNS	Fraud Detection and National Security
FDNS-DS	Fraud Detection and National Security Data System
FY	Fiscal Year
GS	General Schedule
ICE	U.S. Immigration and Customs Enforcement
NOIR	Notice of Intent to Revoke
TSVVP	Targeted Site Visit and Verification Program
USCIS	U.S. Citizenship and Immigration Services
VIBE	Validation Instrument for Business Enterprises

Regional Jurisdictions by State/Territory			
Central	Northeast	Southeast	Western
CO	CT	AL	AK
IA	DC	AR	AZ
ID	DE	FL	CA
IL	MA	GA	GU
IN	MD	LA	HI
KS	ME	MS	MT
KY	NH	NC	NV
MI	NJ	PR	OR
MN	NY	SC	WA
MO	PA	TN	
ND	RI	USVI	
NE	VA		
NM	VT		
OH	WV		
OK			
SD			
TX			
UT			
WI			
WY			