Citizenship and Immigration Services Ombudsman

USCIS SERVICE REQUESTS: RECOMMENDATIONS TO IMPROVE THE QUALITY OF RESPONSES TO INQUIRIES FROM INDIVIDUALS AND EMPLOYERS

March 5, 2012

The Office of the Citizenship and Immigration Services Ombudsman (Ombudsman’s Office) was created to help people and employers with problems they encounter when seeking citizenship and immigration benefits. We serve as a safeguard and a promoter of quality customer service. With this in mind, it is fitting that the Ombudsman’s Office turns its attention to some of the behind-the-scenes machinery designed to support customer service at U.S. Citizenship and Immigration Service (USCIS). The recommendations here specifically address USCIS use of the Service Request Management Tool (SRMT).

Over the past two years, USCIS has made changes with a goal of improving the level of customer service it provides. As two examples, the agency expanded access to the seasoned Information Service Officers who staff the second tier of the National Customer Service Center, and reduced, by half, the amount of time that field offices and centers have to respond to a service request. Yet concerns continue to be raised to the Ombudsman’s Office, both through individual cases and stakeholder feedback, about the quality of the responses to service requests, and about challenges resolving issues that require collaboration between different USCIS offices or centers.

In an effort to improve its responsiveness to customer inquiries and requests for assistance, USCIS implemented the Service Request Management Tool (SRMT) in 2006, which improved the timeliness, consistency and tracking of USCIS responses to customer inquiries. The Ombudsman’s Office review found that while the SRMT is an effective tool for tracking response times, it has greater potential to serve as a mechanism to facilitate problem solving and to identify and anticipate service issues. Increasingly, USCIS field leaders are requiring supervisor review of SRMT responses to customers. The Ombudsman’s Office encourages USCIS to use the rich SRMT data as a tool in identifying and resolving problems and to improve communication and decision making across USCIS.

Implementing a national quality review program for service requests and sharing the results internally and externally would help foster meaningful responses, alert field leadership to customer experiences, and serve as a consistent guide for the initiation of operational or policy changes needed to address systemic issues. Quality review can also help build customer trust and confidence in USCIS’ customer service programs.

Out of the millions of applications and petitions that USCIS touches every day, there’s no doubt that a significant percentage of them are received, processed, and adjudicated seamlessly. Because USCIS is a service-based agency that administers benefits that have profound and far-reaching effects on the lives of immigrants, their families, and on their prospective employers,

the Ombudsman’s Office recommends that USCIS use systems like SRMT to their full potential.

Most sincerely,

January Contreras
Citizenship and Immigration Services
Ombudsman

RECOMMENDATIONS

The Ombudsman recommends that USCIS:

1) Implement national quality assurance review procedures for service requests and make quality a priority;
2) Establish a follow-up mechanism in the SRMT system so that USCIS employees can provide customers with multiple responses (e.g., initial, follow-up, final) for the same service request;
3) Expand self-generated e-Requests to all form types;
4) Pilot mandatory supervisory review of certain SRMT responses; and
5) Post SRMT reports on the USCIS website and standardize the use of SRMT reports to identify spikes, trends, or other customer service issues.

REASONS FOR THE RECOMMENDATIONS

- USCIS has prioritized the timeliness of service request responses, but stakeholders report that USCIS responses to service requests often lack information that is accurate and useful to the customer for resolving the issue.
- USCIS Immigration Services Officers (ISOs) report that the current timeline of 15 days is not always adequate to provide meaningful responses to service requests.
- USCIS has not established agency-wide metrics to evaluate the accuracy, relevance, and overall quality of the responses. Some regions and service centers have implemented local, ad hoc quality assurance procedures, but no national, consistent method exists.
- Inadequate responses erode public confidence in the USCIS National Customer Service Center. Stakeholders increasingly turn towards other customer service options to find a solution, such as scheduling InfoPass appointments, Congressional case assistance, or inquiries to the Ombudsman’s Office.

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March 05, 2012

The Citizenship and Immigration Services Ombudsman, established by the Homeland Security Act of 2002, provides independent analysis of problems encountered by individuals and employers interacting with U.S. Citizenship and Immigration Services, and proposes changes to mitigate those problems.

EXECUTIVE SUMMARY

These recommendations focus on a critical element of USCIS customer service: service requests generated through the Service Request Management Tool (SRMT). U.S. Citizenship and Immigration Services (USCIS) developed the SRMT, an electronic inquiry system, to track and transfer an inquiry from an individual or employer to the USCIS office best able to assist. When a customer contacts USCIS for assistance, service requests may be generated by contractors and USCIS officers staffing the National Customer Service Center (NCSC) – USCIS’ toll-free call center – or by personnel at field offices and service centers. In addition, since July 2010, customers have had the option of initiating their own service requests through the USCIS website for select form types in certain circumstances (referred to as “Service Request Online” or “e-Request”). In Fiscal Year (FY) 2011, there were approximately 78,152 service requests generated per month.

USCIS has prioritized the timeliness of service request responses, but the agency has not uniformly focused on the quality of responses. Stakeholders routinely report that responses to service requests are form letters that lack new information. When USCIS does not provide informative responses to service requests, individuals and employers find it necessary to make repeat requests in search of more accurate, more useful information. These repeat information requests increase the overall volume of calls and visits to USCIS, amplifying the level of frustration experienced by customers, and costing the agency, as well as individuals and employers, both time and money.

More efficient use of the SRMT system’s capabilities would help USCIS address inquiries from individuals and employers, and at the same time enable the agency to identify trends and improve efficiency by reducing the overall number of customer service interactions.

The Office of the Citizenship and Immigration Service Ombudsman (Ombudsman’s Office) recommends that USCIS:

1) Implement national quality assurance review procedures for service requests and make quality a priority;

2) Establish a follow-up mechanism in the SRMT system so that USCIS employees can provide customers with multiple responses (e.g., initial, follow-up, final) for the same service request;

3) Expand self-generated e-Requests to all form types;
4) Pilot mandatory supervisory review of certain SRMT responses; and

5) Post SRMT reports on the USCIS website and standardize the use of SRMT reports to identify spikes, trends, or other customer service issues.

METHODOLOGY

For this recommendation the Ombudsman’s Office: 1) observed customer service operations – specifically the use of the SRMT – at various USCIS facilities, including field offices and service centers; 2) met with the leadership and staff of the USCIS Customer Service Directorate; and 3) reviewed feedback submitted by stakeholders experiencing customer service problems. Many requests for assistance submitted to the Ombudsman’s Office provide examples of difficulties encountered by individuals and employers when attempting to communicate with USCIS to rectify problems.

BACKGROUND

The SRMT is one element of USCIS’ customer service operations. It gives USCIS the ability to create, retrieve, update, and close out service requests using a single, data-driven, workflow-oriented tool. In addition, the SRMT retains the response information provided to the customer by USCIS and permits USCIS management to compile a variety of reports on the number of service requests received, responses generated, timeliness of response, etc.  

USCIS describes the SRMT as “a customized enterprise-wide web enabled application.” In essence, the SRMT is an electronic inquiry management/database system designed to deliver and track internal and external inquiries about pending applications or petitions. USCIS uses the SRMT to create “service requests,” electronic messages that may be directed to a particular USCIS office – a service center, field office, or asylum office – in response to customer information requests or requests to resolve a problem. Most service requests are initiated by customer calls to the NCSC, others are created by Immigration Services Officers (ISOs) in the field, others during InfoPass appointments; some are created by USCIS staff in other situations. In certain limited circumstances, applicants and beneficiaries may self-generate service requests through a web-based SRMT function, introduced in August 2010.

OMBUDSMAN CASE ASSISTANCE

In January 2007, an applicant filed Form I-485, Application to Register Permanent Residence or Adjust Status. When he did not receive a decision, or any updated information regarding his case, the applicant called the NCSC in July 2009, January 2010, and June 2010. The applicant also wrote inquiry letters to USCIS in February 2010 and June 2010. Although USCIS did respond, two of the responses simply informed the customer that his file was at a location other than the field office responsible for processing his case. Despite the fact that both of these responses contained little information of use to the applicant, USCIS closed the associated service requests. The customer felt USCIS had not provided a meaningful response to his service requests so he requested assistance from the Ombudsman’s Office in October 2010. The Ombudsman’s Office contacted USCIS on the customer’s behalf and was able to determine that adjudication of the customer’s application had been delayed due to the need for updated biometrics. The customer was scheduled for a biometrics capture appointment and USCIS approved the application in May 2011.
Because service requests are the primary method by which USCIS receives customer problems, the quick, effective resolution of service requests is important to stakeholders. USCIS reports demonstrate that timely responses are regularly being sent to customers. The SRMT was initially designed to enable USCIS to respond to inquiries within 30 days.\textsuperscript{7} At present, the USCIS goal for providing responses to service requests is set at 15 days.\textsuperscript{8} The agency regularly meets or exceeds this response time goal.\textsuperscript{9}

While USCIS’ emphasis on rapid responses to service requests is laudable, timely responses are not valuable if they do not include information that is both accurate and useful to the customer for resolving the issue that prompted the service request. Stakeholders report that although they receive timely replies to their service requests, those replies are often uninformative, inaccurate, or irrelevant. Currently, the agency does not employ agency-wide metrics to evaluate the accuracy, relevance, and overall quality of the responses. It should be noted that some regions and service centers have acknowledged the need for quality review, going so far as to implement local, \textit{ad hoc} quality assurance procedures. However, these procedures are not part of a national quality assurance program, nor are they coordinated nationally by USCIS headquarters.\textsuperscript{10}

**Overview of USCIS Customer Service Operations.** Since 2007, the Ombudsman’s Office has identified USCIS customer service challenges as ongoing, pervasive and serious. Ombudsman’s Office Annual Reports have discussed various customer service-related problems, including: 1) the inability of immigration benefits applicants and petitioners to communicate directly with supervisors at service centers to resolve problems; and, 2) the delays involved when responses to customer inquiries require USCIS customer service entities to communicate with USCIS field offices and service centers in order to obtain further information.\textsuperscript{11}

USCIS strongly encourages customers seeking general or case specific information to contact its NCSC toll free number (1-800-375-5283), which offers recorded and live assistance options. When NCSC contractors or ISOs cannot resolve the customer’s concern, they often prepare a service request that is electronically sent to the USCIS office with jurisdiction over the application or petition. The service request typically summarizes the question or problem presented by the customer and asks the office with jurisdiction to respond directly to the customer. Approximately 14.8 percent of NCSC calls result in the creation of a formal service request.\textsuperscript{12}

Individuals and employers also may make InfoPass appointments at local USCIS offices to seek case assistance.\textsuperscript{13} ISOs at field offices may create service requests and electronically forward inquiries to other USCIS offices.

USCIS uses the SRMT system to track electronic service requests sent to the field and to service centers. USCIS regional office and service center leadership review SRMT aging reports to track the number of inquiries, service request types, and USCIS response time. SRMT reports are provided to USCIS managers to help in supervising tracking and accountability functions. The quality of service request responses is not currently evaluated through any type of systematic nationally administered and managed review.

**SRMT Expansion.** On August 2, 2010, USCIS introduced an SRMT self-service feature known as “e-Request,” which allows customers to initiate a service request without assistance from USCIS personnel.\textsuperscript{14} The USCIS “e-Request” is for Forms I-90, Application to Replace Permanent Resident Card, and N-400, Application for Naturalization, which are outside normal processing times, and for customers whose I-90 filings did not generate a biometric appointment notice. In FY 2011, USCIS received a total of 5,955 “e-Requests,” the majority of which were for cases outside normal processing times.\textsuperscript{15} In FY 2012, USCIS plans to expand the customer online request feature to the following areas: cases outside normal processing times for all form types; non-delivery of certain notices for Forms I-130, Petition for Alien Relative; I-485, Application to Register Permanent Residence
or Adjust Status; and I-765, Application for Employment Authorization; and typographical errors for all form types.¹⁶

Service Request Breakdown FY 2010 & 2011

<table>
<thead>
<tr>
<th>Service Requests Created By:</th>
<th>2010 FY</th>
<th>2011 FY</th>
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</thead>
<tbody>
<tr>
<td>TOTAL</td>
<td>910947</td>
<td>937833</td>
</tr>
<tr>
<td>LOCAL OFFICE</td>
<td>31346</td>
<td>27699</td>
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<td>1770</td>
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<tr>
<td>LOCKBOX OPERATIONS DIVISION</td>
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<td>0</td>
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<tr>
<td>NATIONAL BENEFITS CENTER</td>
<td>55</td>
<td>18</td>
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<td>496426</td>
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<tr>
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<td>206028</td>
</tr>
<tr>
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<td>53</td>
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<tr>
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<tr>
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<td>0</td>
</tr>
<tr>
<td>E-REQUEST</td>
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<td>5955</td>
</tr>
</tbody>
</table>

Source: Information provided by USCIS (Jan. 12, 2012)

**Improved Timeliness.** USCIS has made great strides in providing timely responses to customer inquiries logged in the SRMT system. The agency reports that it has reduced the target response time from 30 to 15 business days, and generally meets that goal.¹⁷ USCIS also reports that it continues to maintain a five business day response time for expedited handling or a change of address, and a seven business day response time to make reasonable accommodations to schedule interviews or biometrics.¹⁸ These reports do not address how often responses provide useful information or how often responses lead to the resolution of an inquiry.

**Stakeholder Concerns and Nonresponsive Answers to Service Requests.** Stakeholders have regularly expressed to the Ombudsman’s Office and USCIS their frustration with responses that are incomplete or unhelpful. The most common complaint is that service request responses do not answer their questions and simply state that their case is “pending” or “under review.”¹⁹ In these situations, customers who have already invested time trying to resolve an issue through the NCSC increasingly turn to other sources to find a solution,
such as scheduling InfoPass appointments, Congressional case assistance, or inquiries to the Ombudsman’s Office. Such delays in case resolution add unnecessary costs to the immigration process for individuals, employers, and USCIS.

Problems may stem, in part, from the USCIS method for handling customer inquiries that ISOs are unable to resolve within the target 15 day timeframe. If they cannot fully resolve a particular customer inquiry within the allotted time, ISOs typically close that service request with an interim response to the customer. Closing the service request in this manner, with an uninformative, *pro forma*, response often fails to address the customer’s concern, leading to additional service requests, and possibly inquiries to other entities, as noted above.

Applicants and petitioners seeking immigration benefits view the USCIS office they interact with as responsible for the work of the entire agency. Accordingly, when ISO’s close a service request with an interim response, in order to comply with a target response time, stakeholder confidence in the ability of the NCSC to assist customers in resolving difficulties is undermined. Confidence in the ability of USCIS, as a whole, to review and adjudicate immigration benefits applications is also undermined. This is of particular concern since USCIS has made the NCSC the focal point of its customer service strategy, and the central gateway for most inquiries regarding pending applications and petitions. If the NCSC is to serve as the primary USCIS customer service entity, the agency should implement policies that are designed to help the NCSC to succeed, and that improve the NCSC’s public image.

**ANALYSIS & RECOMMENDATIONS**

1) **Implement national quality assurance review procedures for service requests and make quality a priority.**

USCIS has not yet instituted a consistent approach to addressing problems with the quality of its service request responses. Some regional offices and service centers have established local quality assurance programs for service request responses. However, there is no centralized, agency-wide plan for ensuring the quality of responses to service requests. The Ombudsman’s Office recommends that USCIS develop a focused, nationwide, quality assurance plan that includes metrics designed to capture the quality, in addition to the timeliness, of responses to service requests.

Quality responses and quality assurance reviews of service request responses should both be USCIS priorities. Although quality assurance reviews are not a solution, in and of themselves, it is not possible to assure high quality output without determining the source of flaws in current output. Some regions have implemented local quality review procedures, including the Northeast Region, which implemented a pilot program for quality review during spring 2011. The Northeast Region’s pilot program identified a number of erroneous responses attributed to improper use of dropdown menus in the SRMT. However, USCIS reported that these errors constituted an insignificant portion of the overall call volume. USCIS has not publicly reported any further information obtained from this program.

Local procedures and pilot programs are not sufficient to develop and implement nationwide quality standards for service requests. Rather than expending scarce resources on stop-gap measures, USCIS should implement a national customer service quality assurance program that deploys customer service supervisors and other senior field personnel to perform both random and regularly-scheduled quality assurance audits. Such procedures could include monthly, quarterly, and random quality reviews, comparing customer inquiries to the service request
responses actually received by customers. Furthermore, USCIS should exploit the base of knowledge available within the USCIS Office of Performance and Quality\textsuperscript{23} and encourage its participation in the development of an agency-wide quality assurance process aimed at improving the services delivered to USCIS customers.

2) **Establish a follow-up mechanism in the SRMT system so that USCIS employees can provide customers with multiple responses (e.g., initial, follow-up, final) for the same service request.**

USCIS should provide customers with preliminary responses to service requests within 15 days, and keep the request open until a final action is taken. This would facilitate greater accountability for meaningful responses, and provide more effective customer service. At times a service request may require research and review of a case file. If the file is not located in the office to which the SRMT has been assigned, the inquiry likely will not be resolved within 15 days. Local offices and service centers have developed alternative procedures to ensure that they meet the 15-day response time goal. Some USCIS offices are closing cases in the SRMT and creating additional service requests in order to allow more time for the research and follow-up work that are necessary to provide meaningful responses. Other offices have created freestanding databases, outside of the SRMT, to track customer inquiries. Still, other offices disregard the directive for 15-day completion and leave the service request open until it is resolved. None of these alternative procedures is ideal. A system-based, follow-up mechanism within the SRMT would enable USCIS to measure the timeliness of responses, while allowing ISOs to effectively resolve the matter without having to create another service request, or track follow-up action manually or through other local systems.

3) **Expand self-generated e-Requests to all form types.**

USCIS should, as rapidly as possible, expand the customer online request feature to all form types. Self-service features allow USCIS to leverage information technology and the internet to improve public access to customer service tools.

As noted above, during FY 2012, USCIS plans to expand the customer online request feature to the following areas: cases outside normal processing times for all form types; non-delivery of certain notices for Forms I-130, Petition for Alien Relative; I-485, Application to Register Permanent Residence or Adjust Status; and I-765, Application for Employment Authorization; and typographical errors for all form types. Expansion of the self service feature to all forms would enable customers to quickly and easily file service requests via the internet, without the need to access the NCSC in order to speak with USCIS personnel.

4) **Pilot mandatory supervisory review of certain SRMT responses.**

USCIS should mandate supervisory review of its responses to customers inquiring about cases that are beyond normal processing times. This would improve the quality of responses, and help serve as an early warning mechanism for process and adjudication issues that may develop at USCIS field offices or centers.

Frequently, when customers inquire about cases beyond normal processing times, USCIS advises that the case is pending and suggests that the individual wait another 30 to 60 days, and file another service request. This type of response is frustrating to customers who are already concerned about delays in the processing of their benefits applications. Furthermore, such responses do not provide customers with any meaningful information that ensures that their submission is being reviewed and adjudicated.
Additionally, supervisory review would offer an opportunity for senior immigration officers and customer service representatives to mentor new USCIS personnel.

5) **Post SRMT reports on the USCIS website and standardize the use of SRMT reports to identify spikes, trends, or other customer service issues.**

USCIS should post SRMT report data on the USCIS website. This would enhance public awareness, increase agency accountability, and demonstrate USCIS’ commitment to improving customer service. The SRMT provides real-world case data that can assist USCIS, as well as stakeholders, in identifying trends, which the agency can use to improve its processes and procedures.

Expanded use of the SRMT’s tracking capabilities could assist the agency in determining whether the nature and volume of service requests being received by USCIS indicates ongoing problems, or newly emergent ones, and where such problems are occurring. This type of data could be used to identify operational trends, policy gaps, and training needs. Additionally, requiring that USCIS regional leadership monitor and evaluate SRMT data on a monthly basis would ensure that identified problems are addressed at an operational level.

**CONCLUSION**

USCIS directs outside customer service communications through specific channels – call centers, InfoPass appointments, and the SRMT system. Service requests are the primary means through which USCIS solves customer problems and responds to complex customer inquiries. Responses to service requests that are both fast and effective are of great importance to individuals and employers. An application or petition that is beyond normal processing times or one that has been erroneously decided may result in significant hardships for the applicant/beneficiary such as: suffering significant loss of income; being unable to travel; or being separated from loved ones. Accordingly, service requests require fully developed responses that aid customers in moving an application or petition towards final adjudication. A response that does not contain relevant, substantive information is poor customer service. The Ombudsman’s Office recommends that USCIS prioritize service request quality assurance measures and enhance service request follow-up tracking in order to improve outcomes and the quality of services delivered.
Appendix

The following graphic shows the types of service requests generated between October 1, 2010, and March 31, 2011.

Source: Information provided by USCIS (May 25, 2011)

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2 USCIS processes approximately six million applications and petitions annually. Of those service requests, approximately 16,506 were change of address requests submitted online, which, typically do not require a response from USCIS. Information provided by USCIS (Jan. 12, 2012). See also USCIS Annual Report for Fiscal Year 2008, pp. 10-11.
4 IBA Management Solutions, Case Study: Technology Solutions – Service Request Case Management Tool (2010).
5 IBA Management Solutions, Case Study: Technology Solutions – Service Request Case Management Tool (2010).
7 See Ombudsman’s Annual Report 2006 at p. 34 for discussion of SRMT implementation goals, etc. us_Info.pdf
8 Information provided by USCIS (Apr. 27, 2011).
9 Information provided by USCIS (Feb. 07, 2011).
10 Information provided by USCIS (Apr. 27, 2011).
11 See Ombudsman’s Annual Reports 2010, pp. x, 50-59; 2009, pp. 24-27; 2008, pp. 37-42; 2007, pp. 25-31; 2006, pp. 33-36. On June 29, 2011 Director Mayorkas sent a request to stakeholders for new ideas the agency could use to communicate with customers and the general public. This invitation proposes to “help the agency craft a new vision for how the public can address the agency with questions, raise concerns, and how the agency can best deliver substantive responses.” USCIS Public Engagement, A Message from USCIS Director Alejandro Mayorkas (June 29, 2011).
12 Information provided by USCIS (Jan. 13, 2011).
15 Information provided by USCIS (Jan. 12, 2012).
17 Information provided by USCIS (Apr. 27, 2011).
18 Information provided by USCIS (May 25, 2011).
19 See USCIS Questions and Answers, “USCIS Quarterly National Stakeholder Engagement” (Feb. 24, 2011), accessed on May 31, 2011 at: http://www.uscis.gov/USCIS/Outreach/Public%20Engagement/National%20Engagement%20Pages/2011%20Events/February%202011/QA%20-%20Quarterly%20National%20Stakeholder%20Meeting.pdf. USCIS has also indicated that there are circumstances where it cannot release any more information about a case. For example, when a case has background check issues that must be resolved prior to final adjudication. Information provided by USCIS (Feb. 8, 2012).
20 Information provided by USCIS (Nov. 18, 2011).
21 Information provided by USCIS (Nov. 18, 2011).
22 Information provided by USCIS (Nov. 18, 2011).
23 The Office of Performance and Quality (OPQ) is responsible for reporting on enterprise-level performance-related information for all USCIS Field Offices and Service Centers, including application and petition processing times, efficiency ratings and adjudicative staff utilization rates. In addition, the OQP is responsible for identifying and setting staffing levels for all operational components which are developed based upon forecasted workload and available performance data and standards. The office also analyzes data to report on immigration statistics and oversees monthly national quality assurance reviews to ensure USCIS meets quality review standards, accessed on Jan. 26, 2012 at: http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=d84c0b89284a3210VgnVCM100000b92ca60aRCRD&vgnextchannel=d84c0b89284a3210VgnVCM100000b92ca60aRCRD.