

Citizenship and Immigration Services Ombudsman Recommendation

CUSTOMER COMPLAINTS: A TOOL FOR QUALITY CUSTOMER SERVICE AND ACCOUNTABILITY

March 23, 2011

Accessibility and accountability drive the recommendations in this report. Executive and congressional leaders alike have directed Federal agencies to provide high quality customer service and, in doing so, to provide an avenue for the public to submit complaints or comments. For USCIS, primarily a service-based agency, an effective complaints/comments system would be beneficial to both the agency and its customers.

Many USCIS leaders encourage customers to share complaints directly with them so they can quickly address problems. There are clearly instances where this chain of communication and resolution works, especially in the field offices. At the same time, it is not uncommon to encounter USCIS customers who refrain from sharing legitimate concerns or are only willing to report concerns or complaints confidentially. Specifically, customers have reported an unwillingness to share complaints with USCIS because they fear offending the decision-maker as their ability to live, work, or employ a critical employee in the United States hangs in the balance. Furthermore, without a comprehensive method of accepting, tracking, and addressing customer complaints/comments the agency loses a chance to learn about customer experiences system-wide and to identify trends – including both issues of concern and best practices.

While the recommendations here are directed to USCIS, I realize that we are currently missing out on this same opportunity regarding services provided by the Office of the Citizenship and Immigration Services Ombudsman. If you have a complaint or other feedback about an interaction or experience with our office, please contact us at cisombudsman.feedback@dhs.gov. We are counting on you to hold us accountable to deliver responsive services in the same way you should be able to hold accountable all government service providers, including USCIS.

Most sincerely,



January Contreras
Citizenship and Immigration Services
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RECOMMENDATIONS

The Ombudsman recommends that USCIS:

1. Establish a better means of informing the public how to submit general complaints; and
2. Publish the collected complaint data for public scrutiny.

REASONS FOR THE RECOMMENDATIONS

- Although USCIS has established venues for handling customer inquiries regarding specific cases, customers have shared with the Ombudsman that they were unable to find information about how to contact USCIS regarding general matters such as behavior and treatment or areas in need of improvement.
- Information is not easily accessible on how to report a non-case specific complaint or, additionally, how to follow-up on a complaint after it has been reported.
- The lack of a centralized reporting system for customer complaints at USCIS denies USCIS leadership visibility over trends that may be occurring.
- USCIS facilities currently do not have adequate guidance regarding the proper handling and reporting of non-case specific complaints.



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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

While U.S. Citizenship and Immigration Services (USCIS) has devoted significant resources to customer service, the agency does not yet have a uniform procedure for tracking or otherwise managing non-case specific feedback at the national, regional, and local levels.¹

Such feedback or complaints, defined broadly, can include comments or suggestions about a variety of customer experiences such as:

- USCIS facilities or an interaction with USCIS staff;
- Quality and responsiveness of customer service resources;
- Inaccuracy or lack of clarity in USCIS resources; and
- Appropriateness of questions posed in interviews.

When currently seeking to register a complaint or comment, USCIS customers and stakeholders do not find a centralized process. Instead, they encounter a confusing process with little guidance. Publicly available avenues include bringing the matter to the immediate attention of a supervisor; making INFOPASS appointments to speak directly with personnel at local USCIS offices; contacting the Department of Homeland Security (DHS) Office of Inspector General (OIG); telephoning the USCIS National Customer Service Center (NCSC);² writing the relevant USCIS facility, congressional representative, or the White House; or contacting the Ombudsman.³ Local offices are able to handle these matters as they choose, but are not provided with direction agency-wide about how to track such complaints, what the standards should be for responding, or how the effectiveness of actions taken should be measured in order to address serious issues or trends that are reflected in complaints.

The absence of a truly centralized reporting system denies USCIS leadership visibility over trends that may be occurring. By implementing a system to better organize and utilize this type of feedback, the agency could improve customer service by addressing complaints, initiating redress and solutions, where needed, and communicating clearly to the public and/or staff when issues are largely due to communications issues. The USCIS Office of Security and Integrity (OSI) recently announced a complaints tracking initiative that appears to be a step in the right direction. However, as currently structured, this mechanism is too limited in scope to comply fully with the needs of the customer and stakeholder community, as well as legal requirements discussed later in this recommendation. Ideally, USCIS will either expand the

¹ In contrast, USCIS provides instructions for filing case specific inquiries, maintains centralized tracking systems such as the Service Request Management Tool (SRMT) for telephonic inquiries received by the USCIS National Customer Service Center (NCSC) and the Executive Correspondence Tracking (ECT) system for written inquiries received by USCIS or referred to USCIS by outside agencies, and dedicates resources to analyzing reports generated. For example, USCIS Headquarters is able to review SRMT response time metrics and take appropriate action. No such system exists for non-case specific complaints.

² USCIS recently informed the Ombudsman that, after telling callers to file a written complaint with the Director of the facility where they were served, the NCSC provides them with a telefax number and mailing address to contact the Office of Security and Integrity (OSI) to report noncriminal employee misconduct.

³ The Ombudsman receives both written and verbal input in the form of complaints commonly reporting poor customer service: insensitivity, rudeness, misinformation, etc.

OSI initiative or introduce an alternative comprehensive process as a means of monitoring complaints service-wide from submission to resolution.

The Ombudsman recommends that USCIS:

- (1) Establish a better means of informing the public how to submit general complaints; and**
- (2) Publish the collected complaint data for public scrutiny.**

By doing so, USCIS will both gain the ability to mine data that have been under-utilized and satisfy legal requirements.

The Ombudsman identifies several ways to implement these recommendations that build upon existing USCIS processes:

- Issue guidance to USCIS facilities regarding proper handling of non-case specific complaints (e.g., treatment of customers expressing verbal grievances; acceptance of comment cards via “suggestion boxes” at sites with customer contact, review and data entry of these cards; routing for analysis and response; analogous rules for handling correspondence by mail or email).
- Provide clear guidance to customers about how to submit non-case specific complaints to USCIS, whether to the OSI or another designated contact, such as the Regional Offices or the Customer Service Directorate, and ensure that this contact is accessible for concerns beyond reports of employee misconduct internally referred from other USCIS employees and the DHS OIG (e.g., add an email channel and publish guidance elsewhere in addition to the NCSC).
- Expand use of Executive Correspondence Tracking (ECT, also called “Intranet Quorum”), modify the Service Request Management Tool, or use some other system to log, track, and report data from comment cards, correspondence, etc.
- Add a web link to the left sidebar of USCIS homepage under “Customer Tools” entitled “Report a Complaint” that leads to customer guidance.
- Establish protocols for systematic treatment of captured data by local, regional and/or headquarters managers (including sending customers acknowledgement of receipt of their complaints) and, with appropriate redaction, make this information publicly available.

Implementation of these suggestions will foster accountability that can help USCIS better learn where improved communication or customer service is most needed based on the experience of immigration benefits customers.

Background

Current USCIS Director Alejandro Mayorkas signaled a renewed commitment to customers by elevating “Customer Service” to the status of a “directorate” as part of his restructuring of USCIS. Formerly, Customer Service was a division within the Domestic Operations Directorate. This change increased the visibility of Customer Service within USCIS by, in organizational terms, allowing it to report directly to the Director, whereas it had previously reported to the Director only through Domestic Operations.⁴ While USCIS has raised Customer Service’s visibility within the agency, the new directorate has yet to expand its role in complaints processing by issuing policy guidance informing the public how to submit non-case specific complaints. Currently, published guidance is lacking on how to contact OSI or OSI’s handling of complaints; even this avenue is not readily or easily accessible to customers.

The Ombudsman has received inquiries about how to lodge non-case specific complaints with USCIS. Although USCIS has established venues for handling customer inquiries regarding specific cases,⁵ customers have shared with the

⁴ On January 11, 2010, USCIS announced that the Domestic Operations Directorate would be divided into the Service Center Operations Directorate and the Field Operations Directorate.

⁵ The NCSC, via the SRMT, and INFOPASS appointments are the primary means for USCIS customers to request general information, as well as make inquiries regarding their pending cases. Quantitative records of NCSC calls, SRMT requests, and

Ombudsman that they were unable to find published information about how to contact USCIS regarding general matters such as behavior and treatment (e.g., general rudeness, inappropriate language) or areas in need of improvement (e.g., building access, parking, uncomfortable surroundings, cleanliness).⁶ To improve customer service, and pursuant to statute and Executive Order, USCIS has an obligation to maintain a means of tracking such customer complaints from receipt to resolution.

Legislative and Executive Authorities. Both Congress and the Executive Branch have emphasized the importance of customer service and accountability. In 1993, Congress passed and the President signed into law the Government Performance and Results Act (GPRA).⁷ The third of GPRA's six stated purposes is to "improve Federal program effectiveness and increase public accountability by *promoting a new focus on results, service quality, and customer satisfaction.*" [emphasis added] Later that same year, President Clinton issued Executive Order 12862 directing federal agencies to establish means for customers to file complaints and for agencies to address them.⁸

Nearly a decade later, section 478 of the Homeland Security Act of 2002 (HSA)⁹ imposed on the new DHS an annual reporting requirement that included providing quantitative data regarding immigration-related complaints received by any DHS¹⁰ official and plans to address their systemic causes in order to improve immigration services.¹¹ Leaving no doubt about Congressional intent regarding customer service, section 478(b) states, "It is the sense of Congress that (1) the quality and efficiency of immigration services rendered by the Federal Government should be improved . . . ; and (2) the Secretary should undertake efforts to guarantee that concerns regarding the quality and efficiency of immigration services are addressed . . .".

Early in 2009, President Obama set forth his vision of an "Open Government Directive" rooted in transparency about government processes, openness that "promotes accountability" and helps "ensure the public trust."¹²

Consistent with both the GPRA and the HSA, and echoing the Clinton Executive Order, USCIS Director Alejandro Mayorkas acknowledged that USCIS "must be answerable to and responsive to the public...."¹³

Current USCIS Complaints Tracking Systems. To date, USCIS has not established a central portal or management system for non-case specific complaints received. In November 2010, OSI rolled out a next generation case management system. However, no field offices or service centers have access to the system; the database is available only to several dozen OSI Investigations Division officers in a handful of OSI offices nationwide. The new system may eventually become a clearinghouse for complaints, but does not appear to be the agency-wide, integrated tracking system for non-case specific complaints that would give USCIS full control over these issues. Without such control, the agency still lacks

INFOPASS appointments are created and tallied not only by operational entities in the field (for employee performance evaluation), but also reported to a central headquarters element for further scrutiny and interpretation.

⁶ While recognizing that egregious matters – e.g., bribery/extortion, assault/battery -- might be referred by USCIS to its Office of Security and Integrity or to the DHS Office of the Inspector General, the Ombudsman is focusing solely on those complaint channels readily accessible to the public. This recommendation reviews means for customers to file grievances, and not the agency's investigation options for matters that do come to its attention.

⁷ Pub. L. No. 103-62 (1993)

⁸ See <http://www.archives.gov/federal-register/executive-orders/pdf/12862.pdf> (accessed Jan. 26, 2011).

⁹ Pub. L. No. 107-296.

¹⁰ Although this subsection (a)(2)(E) says "any official of the Department of Justice," DHS appears to have conceded that this was a legislative typographical error when, in the annual report required by this section of the statute, it modified the language to read "any official of the Department of Homeland Security," and proceeded to address the issue specified.

¹¹ Regarding the "number and types of immigration-related grievances filed with any official of the Department of Homeland Security, and if those grievances were resolved," DHS stated, "This information is not available." Annual Report on the Impact of the Homeland Security Act on Immigration Functions Transferred to the Department of Homeland Security (Nov. 8, 2010), p. 3.

¹² Obama "Memorandum on Transparency and Open Government" (Jan. 21, 2009), <http://www.archives.gov/cui/documents/2009-WH-memo-on-transparency-and-open-government.pdf>; cf. Obama Executive Order 13520, "Reducing Improper Payments" (Nov. 20, 2009), <http://edocket.access.gpo.gov/2009/pdf/E9-28493.pdf>.

¹³ Foreign Press Center, "Briefing with Alejandro Mayorkas, USCIS Director" (Oct. 21, 2009).

a mechanism to promptly identify service trends that are impacting customers, and to ensure appropriate handling or investigation followed by timely response.

To the extent any means of submitting comments, suggestions, and outright grievances exist, except as noted in the next paragraph, they lack uniformity and relevant data are largely unreported for centralized consideration within USCIS. The Ombudsman focuses here on standardized means for customers to provide input – a complaints process to enhance customer service and accountability.

Posted Complaint Filing Instructions. USCIS states that its public offices must post, under the heading “Department of Homeland Security Office of Inspector General,” information on how the public may contact the DHS OIG via (a) postal mail, (b) email, and (c) toll-free telephone.¹⁴ The agency publishes the following contact information on a poster under the admonition, “Report suspected criminal violations, misconduct, wasteful activities, and allegations of civil rights or civil liberties¹⁵ abuse to the:”

DHS OIG HOTLINE
245 Murray Drive, Building 410 Stop: 2600
dhsoighotline@dhs.gov
Tel: 1-800-323-8603

To this information, the USCIS website adds a telefax number for contacting the OIG: Fax: 1-202-254-4292.

Additionally, in reviewing the USCIS website, the Ombudsman found only one reference to possible customer complaints – those alleging employee misconduct. The webpage entitled “Report USCIS Employee Misconduct”¹⁶ tracks the DHS OIG notice described above instructing anyone with knowledge or suspicion of criminal violations, misconduct, wasteful activities or allegations of civil rights or civil liberties abuse by a USCIS employee to report the matter to the OIG.

Beyond the narrow class of serious, possibly criminal, misconduct referable to the OIG, the website presents no process for customers to report general comments or lesser complaints not about civil rights or criminal violations. A November 16, 2010 USCIS blog posting reinforces this point by referring customers with service-related complaints who have already contacted the USCIS office directly (i.e., spoken with a supervisor or written to the office address) to the OIG.¹⁷ Nowhere in the blog is OSI mentioned or its contact information listed, although callers to the NCSC are provided this information and OSI administers the complaints tracking system debuted in November 2010.

While the USCIS website contains no additional instructions regarding customer filing of complaints, USCIS reports receiving some non-case specific complaints via the “Contact Us” feature of the website listing a variety of ways to contact the agency. The agency webmaster attempts on an *ad hoc* basis to forward complaints received at uscis.webmaster@dhs.gov to the appropriate office: e.g., it refers fraud allegations to the Fraud Detection and National Security Directorate. However, USCIS says that expansion of “Contact Us” from what once was a single email address to its current form as a lengthy webpage listing numerous avenues for contacting USCIS has slowed the number of emails coming to the general feedback mailbox maintained by the webmaster.

Interactive Information on Complaint Submission (Live One-to-One Assistance). In addition to reviewing passive information provided by posted notices or on the USCIS website, the Ombudsman reviewed information available to customers via interaction with a USCIS representative, either by telephone or in-person. As the NCSC represents the primary avenue for customers to access USCIS telephonically, the Ombudsman researched how the call center handles

¹⁴ The Ombudsman has not sought to verify compliance with the DHS OIG Hotline posting requirement.

¹⁵ USCIS customers may also submit complaints alleging violation of civil rights or civil liberties to the DHS Office of Civil Rights and Civil Liberties (CRCL). See http://www.dhs.gov/xabout/structure/gc_1273526572731.shtm.

¹⁶ USCIS website, “Report USCIS Employee Misconduct,” <http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=4a6e0b89284a3210VgnVCM10000b92ca60aRCRD&vgnnextchannel=4a6e0b89284a3210VgnVCM100000b92ca60aRCRD>.

¹⁷ See <http://blog.uscis.gov/2010/11/five-questions-and-answers-how-to.html>.

customers wishing to make a complaint or to provide non case-specific comments about the agency's operations, policies, personnel, facilities, etc.¹⁸ The most frequent NCSC response to such callers is that they write a letter to the specific office responsible, or that they make an INFOPASS appointment to discuss the matter with an immigration officer at a local office. In a few instances, the NCSC suggested lodging a complaint with the USCIS OSI or the DHS OIG.

Confirming the Ombudsman's observations, USCIS says that, in some situations, the NCSC provides callers with the following direct access information regarding OSI, but that the information is not published on the website or elsewhere. Scripts used by NCSC representatives require them to provide the following information,

If they have tried working with the local office Director and feel they didn't receive an appropriate response, they can then contact the Office of Security and Integrity. Callers can report employee misconduct by fax at 202-233-2453 or by mail at the following address:

Chief, Investigations Division
OSI MS 2275
USCIS
633 Third Street, NW, 3rd Floor
Washington, DC 20529-2275

Notably, when the NCSC suggested a written inquiry, it was unable to advise the customer of the timeframe in which to expect a response. Also, OSI confirms that it maintains neither an email address nor a telephone number for use by the public.

Customers appear to have the greatest chance of having their grievances immediately addressed when they present their complaints in person, either to a supervisor immediately after occurrence of the objectionable events or during a later INFOPASS appointment with a USCIS staff member at a local office. The Ombudsman surveyed nearly a dozen USCIS field offices to determine how they receive and handle locally filed customer/stakeholder complaints and comments. Most field office managers reported that their offices receive very few customer complaints, and several indicated that when they do receive such input, they typically handle the matter on the spot.¹⁹

USCIS field managers reported receiving even fewer verifiable written complaints than they do complaints submitted in person. They say that correspondence containing a name and address are answered, but at least one office reports abandoning its survey/suggestion box because submissions were (a) declining in number, (b) usually anonymous, or (c) often complimentary (and, therefore, not an actionable complaint).²⁰ Further, the Ombudsman heard from several USCIS offices that in many cases involving suggestions or comments about a particular employee that are neither case-specific in nature, nor rise to the level of employee misconduct, by the time a letter reaches the manager, it is difficult to pinpoint the employee who engaged the customer and is referred to in the complaint. Problems verifying complaints can result from customer delay in alerting the manager, in some instances due to fear of repercussions before a benefit is granted, but may also stem from delay in referral of complaints from OIG to OSI to the field manager.

Whether received immediately via customer input at the local office or via internal USCIS referral, complaints appear to be taken seriously enough that field managers instruct office personnel to refer them directly to the facility director or other high ranking official.

¹⁸ Besides asking USCIS how the NCSC answers such inquiries and reviewing "scripts" Customer Service Representatives are required to use, the Ombudsman's methodology included making numerous calls to the NCSC in the role of a customer seeking to make a complaint.

¹⁹ The Ombudsman gathered this information during visits to a number of field offices. Also, during the October 6, 2010 "Listening Session" on customer complaints hosted by the USCIS Office of Public Engagement, senior Field Operations officials and directors of the four regional offices agreed that contemporaneous complaints to a supervisor at the local office are taken seriously and usually resolved the same day.

²⁰ Managers stated that anonymity may stem from fear of retribution and not necessarily indicate a false claim; they took the common sense approach of attributing greater weight to negative reports repeated about the same officer, particularly if they mentioned the same issue.

Other Federal Agencies and DHS Components Providing a Complaint/Comment Mechanism. To better understand how USCIS might establish a standardized, uniform complaint and comment process for its customers, the Ombudsman studied other agencies both within and outside of DHS that have established such processes for the customers they serve. This research revealed that a number of federal executive branch agencies²¹ have established complaint procedures with clear, easy-to-follow instructions on how to file complaints, as well as means of acknowledging receipt, logging/tracking, investigating, and resolving them.

Likewise, although the Ombudsman receives feedback in the form of non-case specific complaints, this mechanism does not represent a direct means of filing complaints with USCIS.²²

Analysis and Recommendations

1. Establish a better means of informing the public how to submit general complaints.

USCIS has made strides in developing the OSI complaint channel, but must determine if this system or some other will be the central portal for general non-case specific complaints. The agency should publish customer guidance on submitting these complaints to USCIS to OSI, or another office such as the Regional Offices or the Customer Service Directorate. USCIS must then ensure that the designated contact's scope or jurisdiction includes any concerns that involve a non-case specific complaint or comment, not just a narrow range of the types of concerns. The utility of these channels will depend on agency willingness to establish protocols for systematic treatment of captured data, whether it reaches USCIS at the local, regional, or headquarters level. Protocols should also include, at the front end, sending letters acknowledging customer complaints. At the back end, in the interest of transparency, the agency should make publicly available statistics regarding the nature and number of complaints received.

Instructions about how to access the designated contact must be made widely available through a number of channels, including a web link on the USCIS website home page. This link could be entitled, "Report a Complaint," and added to the "Customer Tools" sidebar. The agency could evaluate several existing processes facilitating the flow of internal communications generated by external inquiries (e.g. ECT or SRMT).

Since 2007, USCIS has expanded OSI's role²³ to include handling referrals of external complaints, but without ever publishing a means of direct submission by customers.²⁴ Recently, the agency announced an improved system for OSI to keep records of all complaints it receives. Yet, the only public source of OSI contact information (postal address and telefax) is the NCSC toll-free number or, possibly, referral from a well-informed USCIS local office employee during an INFOPASS appointment.

Unless USCIS adequately disseminates instructions for public reporting of general complaints, the promise of any new system cannot be fulfilled because complaints will continue to be underreported. For example, in its only prior experience accepting complaints by email, OSI received about 5,000 in one month. USCIS reports that resource limitations led to closure of the email channel, as OSI received a high number of complaints it considered outside its scope. As OSI

²¹ The Ombudsman researched online the complaint process for several entities, including: U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, Transportation Security Administration, U.S. Postal Service, Food and Drug Administration, and U.S. Department of State. Additionally, in August 2009, the DHS Privacy Office established a formal Complaint Tracking System, a correspondence workflow system to help the agency respond to complaints, comments, and requests for redress. DHS Privacy Office, "Department of Homeland Security-028 Complaint Tracking System of Records," 74 Fed. Reg. 35877-35880 (July 21, 2009).

²² The Ombudsman forwards relevant complaints via several channels, including the correspondence tracking database serviced by the Customer Assistance Office, the Project Liaison Team, and direct contact with OSI or the appropriate USCIS facility.

²³ USCIS created this office on March 15, 2007 to consolidate audit and internal self-inspection functions in order to "elevate and increase the visibility of USCIS internal security and integrity programs." USCIS Press Release, "New USCIS Office Enhances Internal Security" (Apr. 17, 2007).

²⁴ The OSI maintains an extensive webpage on the USCIS intranet, but has no publicly accessible website.

currently projects its *annual* caseload to be approximately 1,000, comparison of the two numbers suggests that many more complaints are in search of a reporting avenue.

Since November 17, 2010, the OSI Investigations Division has been maintaining records of complaints, whether direct submissions from customers or internal referrals (from field offices, service centers, OIG, etc), via the Investigations Division Case Management System. OSI expects to continue developing and refining this case management system, which now captures both complainant and referral information.

In sum, whereas the public OIG notice advises that both DHS employees and the public may report to the OIG “suspected criminal violations,” etc., complaints reach the OSI largely through internal channels (e.g., forwarded by employees²⁵ or received from the OIG) and address misconduct that fails to rise to the level of criminal activity required by OIG. While the exact scope of OSI review is not specified to the public, USCIS says that OSI sends reports of rudeness or unprofessional behavior²⁶ to the appropriate field manager, either as formal inquiries requiring a response or as information with no response required.

Before USCIS can establish an effective complaints tracking system, it must decide how to standardize the disparate means of managing the public’s submissions of concerns.

2. Publish the collected complaint data for public scrutiny.

In keeping with DHS policy implementing Presidential directives to increase transparency, USCIS should make available on its website the complaints data reported from the field with information that describes whether a complaint was substantiated and addressed. Such access should allow stakeholders to monitor an essential aspect of customer service – handling of complaints – and compare performance among offices. Parameters to consider would include, but not be limited to, nature of complaint, type of benefit involved, office size, geographical region, and resolution. The Ombudsman believes that, by presenting information in a summary way, statistically valuable data can be published without compromising confidentiality.

Conclusion

The absence of a published customer comment intake process, coupled with *ad hoc* management processes, deprives USCIS of feedback vital to improving customer service. While overall satisfaction of customers and stakeholders ultimately depends on the timely receipt of the immigration benefit sought, USCIS should seize the chance to use direct feedback from customers to consistently improve the quality of customer service in the benefit-seeking process. Beyond the fact that federal law specifically requires tracking of immigration-related complaints, USCIS has a genuine opportunity to use complaint data to identify trends experienced by customers. If utilized in the right way, thoughtfully collected complaint data can empower USCIS to solve newly emerging problems as they present themselves. This would be valuable to USCIS customers, as well as to the agency itself.

²⁵ Instructions for filing a report with the OSI, including the downloadable form to use, are only accessible to USCIS employees having access to the agency’s intranet.

²⁶ OSI also may forward matters to the OIG, as may occur where an internal employee report of a fellow employee’s misconduct constitutes a criminal violation or infringes civil rights/liberties.