



**Homeland  
Security**

# Engagement Readout

## **The CIS Ombudsman's Webinar Series: 2021 Annual Report**

On July 14, 2021, the Department of Homeland Security's (DHS) [Office of the Citizenship and Immigration Services Ombudsman \(CIS Ombudsman\)](#) hosted a webinar highlighting its 2021 Annual Report to Congress.

During this engagement, the CIS Ombudsman's staff provided an overview of the 2021 Annual Report and shared practical, actionable recommendations made to USCIS for improving the administration of immigration benefits and services. The CIS Ombudsman tracks USCIS' progress on recommendations made in previous Annual Reports. USCIS acts upon some recommendations immediately, while others may take years to result in change.

Below are the topics and some of the recommendations discussed.

### **The COVID-19 Pandemic and its Impact on USCIS Operations**

As USCIS returns to normal processing, lessons learned from the pandemic may help the agency mitigate some lingering challenges. The CIS Ombudsman recommends USCIS develop and implement a strategic backlog reduction plan matching operational demands with available resources, use its incoming monies wisely, and expand its public outreach to foster use of all available tools and resources such as online filing.

### **Issuance and Coordination of Notices to Appear (NTAs)**

As the agency works on the implementation of new NTA guidance, the CIS Ombudsman recommends USCIS take additional actions to improve the service of NTAs, to create a more fair and just process, and to increase administrative efficiency. To the extent that USCIS continues to have a role in serving NTAs on the Executive Office for Immigration Review, it should develop internal procedures to address or otherwise perfect NTAs that are issued to noncitizens but never subsequently filed with the court.

### **Petitions for Removal of Conditions for Conditional Permanent Residents**

There are a variety of actions USCIS could take to increase efficiencies, manage expectations, and minimize the adverse impacts of processing delays on Form I-751, Petition to Remove Conditions on Residence. The CIS Ombudsman recommends that USCIS should lengthen the validity period for temporary evidence of Conditional Permanent Resident (CPR) status and post local field office processing times for Form I-751. In addition, USCIS can improve the processing of concurrently pending Forms I-751 and N-400, Application for Naturalization by aligning the internal adjudicative platforms of these benefit requests, modifying the Form N-400 interview notice, and allowing the National Benefits Center to adjudicate interview-waived Form I-751 petitions.

### **The Medical Disability Waiver Process**

The CIS Ombudsman recommends USCIS take action to ensure that eligible applicants with a disability have equal access to naturalization by increasing public outreach and expanding the list of medical professionals authorized to complete Form N-648, Medical Certification for Disability Exceptions. Pre-adjudicating concurrently filed Forms N-648 at the National Benefits Center and increasing officer training would foster consistency and efficiency in the medical disability waiver process.

### **An Update on the Continuing Complications of USCIS' Digital Strategy**

The CIS Ombudsman recommends implementing outreach and education initiatives to encourage customers to file online, prioritizing the development of high impact/volume immigration benefit filings and recommitting to helping customers with limited English proficiency. The CIS Ombudsman also recommends interim measures, such as increasing use of email communications and establishing a central portal for the electronic submission of Form G-28, Notice of Entry of Appearance as Attorney or Representative, as well as taking appropriate measures to timely update USCIS systems and corresponding paper files.

### **International Student Programs**

The CIS Ombudsman recognizes that USCIS has taken steps to improve oversight of the international student program and suggests that a DHS working group with headquarters and field participants could further foster collaboration between USCIS and U.S. Immigration and Customs Enforcement. In addition, the CIS Ombudsman recommends enhanced training for Designated School Officials (DSOs) to improve understanding of advanced issues and fraud and efforts to eliminate communication barriers between DSOs and USCIS.

The CIS Ombudsman will continue to collaborate with USCIS on these recommendations to effect meaningful change.

Visit the CIS Ombudsman's [Annual Report to Congress](#) page to read the highlights and the full Annual Report.

464 stakeholders joined this webinar (attorneys/legal representatives – 37%, government workers – 24%, employers – 9%, petitioners/applicants – 3%, advocacy groups – 2%, and others – 25%). Participants submitted 30 written questions and the speakers answered as many as possible during the engagement. Below is a sample of the questions received:

- What responsibility, if any, does USCIS have to act upon the CIS Ombudsman's recommendations? Is there a timeframe for USCIS to respond to or implement the recommendations?
- The CIS Ombudsman's Office made several recommendations to USCIS about concurrent Forms I-751 (Petition to Remove Conditions on Residence) and N-400 (Application for Naturalization) processing. Is USCIS doing anything about it? For example, why does USCIS still conduct interviews for low risk Form I-751s, which will result in a slowdown of N-400 processing?
- The 2020 Annual Report included a section relating to denaturalization, while this year's Annual Report does not. Is the CIS Ombudsman continuing to review or oversee denaturalization-related efforts?

While there were many questions directed to the CIS Ombudsman there were also questions specifically for USCIS, which will be taken into consideration for future conversations we have with USCIS.

#### **Speakers from the CIS Ombudsman's Office**

- Phyllis Coven, CIS Ombudsman
- Bertha Anderson, Chief of Public Engagement
- Elissa McGovern, Chief of Policy
- Ciro Parascandola, Assistant Chief of Policy
- Fatimah Mateen, Senior Advisor
- Michael Onka, Senior Advisor
- Frederick Tronccone, Senior Advisor