The Department of Homeland Security (DHS) Office of the Chief Information Officer (OCIO) conducted a program review of the United States Citizenship and Immigration Services (USCIS) – Benefits Provision-Verification Information System (VIS)/Employment Eligibility Verification (EEV) program. This assessment represents the program’s status through March 2012.

Description and Background:
The VIS program has demonstrated value to an assortment of public and private organizations in meeting its mandates and providing services including responding to an increasing scope and customer base. The E-Verify and Systematic Alien Verification for Entitlements (SAVE) applications verify work authorization and immigration status of potential employees’ eligibility to work. These verification services are used extensively across the nation by more and more employers. Recent legislation promotes the implementation of mandatory E-Verify. If the use of E-Verify becomes mandatory for all workers in the United States, the query volume per year could substantially increase. To scale VIS so that it can process an ever-increasing volume of cases while meeting current system performance levels, USCIS/Verification Division will modernize the system by implementing a series of software releases that will revise the architecture of the technical infrastructure and improve business processes. For these upgrades, the Capability Development Plan and Mission Needs Statement have been signed by the Component Acquisition Executive; and the draft Acquisition Plan is currently being reviewed by the Office of the Chief Procurement Officer. The program is currently awaiting an Investment Review Board meeting to proceed through Acquisition Decision Event – 1 for the upgrades to its technology. In addition, VIS plans to have its final Life Cycle Cost Estimate complete in June 2012.

Risks and Issues:
VIS received a conditional Enterprise Architecture Decision-1 from the Enterprise Architecture Board for their planned modernization effort. The program was directed to continue to work closely with the Enterprise Architecture office during acquisition planning. In addition, the program has identified the following high risks:

- If the VIS environment continues to be impacted by increasing Federal or state demands, this will negatively affect the program’s ability to successfully operate and accomplish its mission goals as the program may have to negotiate cost and schedule changes with the contractor.

- If VIS scalability is not improved from its peak capacity of 60 million queries, VIS will be unable to meet system demand when E-Verify becomes congressionally mandated.
• If VIS cannot optimize the process of validating an individual’s immigration status or authorization for employment, USCIS will not be able to improve its fraudulent activity detection.

Mitigation Strategy:
VIS employs a Risk Management Team consisting of the Verification Division and contractors who meet on a regular basis. This team identifies any potential risks to the program and discusses what actions should be taken to diminish them. In addition, the VIS Executive Steering Committee (ESC), once approved by the Under Secretary of Management (USM), will provide better coordination and oversight across component modernization efforts. The program has also identified the following ways to mitigate the risks noted above:
• Develop a contingency plan that adds system capacity for expected Federal or state demands. Maintain ongoing communication with Congressional Relations to monitor legislative reform impacting the Verification Division.
• Develop a contingency plan that adds system scalability for the expected peak volume. Modeling and simulation has been performed to determine the capacity needed.
• Ensure documentation and business needs are articulated clearly to substantiate the requirements.

Assessment:
The program is well managed with respect to configuration management, architecture, and testing considerations. However, external factors, such as Congress and state legislation, pose potential unknown scope risks for VIS. Any immigration reform legislation that Congress may pass could also potentially have a substantial effect on the demand for VIS services. In addition to the Congressional mandates, many of the systems and data sets that feed VIS will be concurrently undergoing modernization under the USCIS Transformation program. All of these factors represent varying degrees of risk to VIS going forward, but are being managed and mitigation plans are in place. The CIO assesses the USCIS – VIS program as Medium Risk.

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