RECOMMENDATION AR 2007 -- 18

The Ombudsman recommends that USCIS' blended approach to training continue and expand. USCIS should establish, regulate, and evaluate core training needs throughout its operations in the same manner for its review of the Basic Officer Training Course for adjudicators.

Moreover, the quality of the curriculum, teaching methodology, and instructors needs to be assured. USCIS should establish a certification process for both federal and contracted instructors.

USCIS has several strategies to meet uneven demands and surges of work. It hires temporary employees, sends cases to less busy offices, and shifts permanent employees to different offices on temporary assignments. As described in the Ombudsman's previous annual reports, USCIS has become dependent on temporary employees who have stayed for several years.

RECOMMENDATION AR 2007 -- 19

To reduce USCIS' dependency on temporary employees and assignments, the agency should establish a table of standard staffing levels and office organization to provide the requisite staff at any particular office.

2. Staffing, Career Development, and Training Areas of Concern

The Ombudsman will continue to monitor the following issues:

a. Training After Immigration Reform

If comprehensive immigration reform is enacted and signed into law, the thoughtful and systematic training of officers contemplated in USCIS' Strategic Workforce Plan and illustrated in the process to redesign the Basic Office Training Course may be overwhelmed by the need for large numbers of narrowly trained employees to implement discreet provisions of the reform. Contingency plans must be in place to ensure that the systemic training and careful development of permanent USCIS staff to fill future gaps is not forgotten when management invariably diverts its attention to implementing immigration reform provisions.

b. Hiring of Temporary Employees

The agency also needs to be cautious that the expedient hiring of large numbers of workers does not replicate the situation of the large numbers of "term employees" hired originally for backlog reduction. Term employees became an essential part of the USCIS workforce, but they were not guaranteed careers, hired for growth potential, or trained as carefully and broadly as permanent employees. Staff morale and office efficiency suffered as the term contracts had to be renewed each year, often not until the last minute. Term employees also