



**Homeland
Security**

RECOMMENDATION FROM THE CIS OMBUDSMAN TO THE DIRECTOR, USCIS

To: Eduardo Aguirre, USCIS Director
Cc: Admiral Jim Loy
From:: Prakash Khatri, CIS Ombudsman
Date: November 29, 2004
Re: Recommendation that USCIS issue national policy guidance on the implementation of InfoPass to ensure equitable access to immigration services. Specifically, the guidance should direct that:

1. All districts should schedule as many InfoPass appointments as possible.
2. Each field office must either reserve some time each week for walk-in appointments or implement clear procedures for emergency, same-day appointments due to exigent circumstances. To ensure standard implementation nationwide, USCIS Headquarters should promulgate a definition of “exigent circumstances” and provide examples of situations that would warrant same-day appointments.
3. Each field office must either have a kiosk or computer available to help customers make an InfoPass appointment. If the local offices are not immediately capable of providing this service they must at least compile and provide a list of public libraries, legal services providers, and/or community-based organizations that can help immigration customers make InfoPass appointments. Local offices should *not* simply use their current list of immigration legal services providers, but should compile a new list with the prior consent of each listed entity.

I. BACKGROUND

InfoPass has eliminated long lines at many USCIS field offices and is a welcome change. The Ombudsman applauds this significant modernization effort and is pleased by reports from districts where InfoPass has greatly improved customer service. However, the Ombudsman is disturbed by reports from several field offices that customers without an InfoPass appointment are routinely turned away; that no computer is available at most offices for customers to make an InfoPass appointment; and that no effective procedures are in place to accommodate true emergencies that require immediate service. Although USCIS is actively working to solve many

of the technical problems with InfoPass, the agency must also issue clear policy guidance to ensure equitable access to immigration services at all USCIS field offices.

II. JUSTIFICATION

Any services modernization cannot come at the cost of customer service. Although InfoPass has eliminated the lines at local USCIS offices, it is apparently not yet capable of ensuring access to all immigration customers. Across the country, immigration customers report extreme difficulty in making InfoPass appointments: there are simply not enough appointments available. In addition, the Ombudsman's office has received reports from Arlington, Atlanta, Baltimore, Charlotte, Cherry Hill, Chicago, Des Moines, Kansas City, Omaha, and San Diego that customers without InfoPass appointments are turned away, yet these offices have no effective emergency or walk-in appointment procedures and have no reliable way to help customers make InfoPass appointments on site. InfoPass implementation at these offices has effectively denied access to immigration services for many customers.

This problematic implementation exacerbates the difficulties faced by many immigrants and erodes public confidence in USCIS. For example, the Ombudsman's office has already learned that questionable "consultants" are charging vulnerable immigrants exorbitant fees to make InfoPass appointments. Rather than improving customer service, Infopass – when implemented without adequate policy guidance – further erodes public trust in the immigration system.

The Ombudsman understands that there must be some flexibility in the implementation of InfoPass to accommodate the varying needs and resources of different USCIS field offices. However, USCIS must ensure that all field offices follow basic policies to prevent a decline in service or the complete denial of service to customers with true emergencies or those without computer access.

IV. BENEFITS

Customer Service

This recommendation will greatly improve customer service by ensuring equitable access to immigration services nationwide. USCIS will also regain a measure of public trust by proactively addressing problems in districts where InfoPass has denied access to many immigration customers.

USCIS Efficiency

When equitably implemented at all USCIS field offices, InfoPass will increase efficiency by allowing each district to effectively manage its schedule of appointments.

National Security

This recommendation poses no risks to national security and will enhance the integrity of the immigration system.