

September 1990

# INFORMATION MANAGEMENT

## Immigration and Naturalization Service Lacks Ready Access to Essential Data



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**Information Management and  
Technology Division**

B-240117

September 27, 1990

The Honorable Dick Thornburgh  
The Attorney General

Dear Mr. Attorney General:

This report discusses the Immigration and Naturalization Service's (INS) information resources management (IRM) and represents part of an ongoing general management review. As part of the general management review, our General Government and Accounting and Financial Management Divisions are analyzing INS' planning processes, organizational structure, management practices, and financial issues. They will report their results soon. Our objective was to assess how effectively INS manages its information resources to support its mission. Specifically, we assessed information needed by (1) headquarters officials to manage, monitor, and evaluate major programs; and (2) field officials to implement goals, objectives, and legislative requirements.

In working with INS' chief IRM official and the Special Assistant to the Commissioner, we provided several briefings throughout our review, which assessed the Service's IRM plans, policies, and evaluation program. Appendix I details our objective, scope, and methodology.

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**Results in Brief**

INS' managers and field officials do not have adequate, reliable, and timely information to effectively carry out the Service's mission. The Service's information resources management problems are varied. Program and management data are kept in a loose collection of automated information systems, as well as a number of ad hoc, labor-intensive manual systems. These information systems contain incomplete and inaccurate data which cannot be efficiently accessed or shared. Further, because of the autonomy of INS' regional and central offices, redundant systems have been developed.

As a result, top managers cannot measure program performance and field office productivity. In many instances, the Service does not have information needed to (1) identify, apprehend, and deport criminal aliens; (2) process an alien's application for benefits; and (3) account for or collect fees owed to the government. Consequently, the Service is at risk of admitting illegal aliens and granting benefits to alien applicants who are not eligible. Further, millions of dollars in breached surety bonds and other penalties are going uncollected.

An overriding problem is that INS' IRM plan offers conceptually sound goals but provides little direction on how to meet them. An IRM plan should first, define its own agency's information needs and second, describe how technology can best support these needs. INS did define and assess its information needs in the early 1980s. Management, however, soon disregarded the assessment, focusing instead on individual program needs in an attempt to speed up systems development. This resulted in an ad hoc systems modernization effort. Later, INS attempted to correct this piecemeal approach by developing an IRM plan. While this plan set forth goals and system initiatives, it was not based on a comprehensive INS-wide information needs assessment. Without this assessment, it is difficult to develop an overall architecture or plan that describes how the organization's technology resources—hardware, software, communications, and people—will best support the agency's information needs. Further, policies that would promote information sharing and standardized system development have not been fully implemented. Finally, the Department of Justice and INS have not effectively evaluated the Service's management of its information resources. Evaluations have focused on specific information systems, rather than addressing how effectively INS has managed its information resources as a whole.

INS has taken steps to correct information problems by enhancing systems' capabilities and improving its IRM planning process. However, a concerted effort and long-term commitment by agency leadership is needed to make INS more efficient and provide the information needed for its mission.

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## Background

INS administers federal immigration policies and enforces immigration laws by controlling the entry of aliens into this country, adjudicating alien requests for benefits, and examining alien applicants who want to become citizens. Each year about 350 million people cross our borders, over 280,000 persons are naturalized, and more than 2 million aliens file applications for benefits. INS also apprehends and deports aliens who enter illegally or whose stay is not in the public interest. During the 1980s, INS acquired new responsibilities, most notably enforcing sanctions against employers who (1) knowingly hired aliens not authorized to work in the United States and (2) did not verify the job applicant's eligibility to work in this country.

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To carry out its mission, INS employs about 17,000 people, has a budget of about \$1.1 billion, and operates in a highly decentralized environment, with a headquarters in Washington, D.C., and many field offices. The field offices are divided into 4 regions, 33 districts, and 21 border patrol sectors, which are made up of 296 sub offices and border patrol stations, and 610 air, land, and sea ports of entry.

Information is critical to INS. The Service maintains automated records on over 23 million aliens plus 30 million non-immigrant students and visitors. In fiscal year 1990, INS plans to spend about \$143 million on information resources. Most of this money will be used to maintain and operate existing information systems supporting operational and administrative areas. Management and program data are kept in over 120 information systems, ranging from large, complex, centrally developed and maintained systems to small computer applications used at field offices. In addition, there are many individually developed manual information systems.

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## Information Systems Do Not Readily Provide Needed Data

INS' manual and automated information systems are not giving top management and field staff the data needed to assess, monitor, and administer the Service's diverse and complex mission. According to INS executives and mid-level managers, the lack of reliable, timely, and complete information hinders their work and wastes scarce resources.<sup>1</sup>

Data compiled by INS offices are kept in numerous automated information systems that (1) are missing critical information and (2) cannot electronically share or exchange data. Consequently, INS cannot easily and readily get the information needed to:

- Administer part of the employer sanctions provisions of the Immigration Reform and Control Act.
- Detect, apprehend, and deport criminal aliens.
- Make appropriate and consistent benefit application decisions in a timely and efficient manner.
- Control and manage its financial resources.
- Measure program performance and field office productivity.

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<sup>1</sup>According to a questionnaire we administered to INS managers, only 29 percent reported that they had adequate information.

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## Poor Data Hinders Administration of Employer Sanctions Program

Top program managers and field office officials do not have the information needed to effectively administer the employer sanctions provisions of the Immigration Reform and Control Act of 1986. This act prohibits employers from hiring aliens who are not authorized to work in the United States. To support this act, INS has been developing and modifying an automated system since 1986. However, this system is missing information critical to effective program implementation, and much of the process is still manual. For instance, in investigating employers, INS cannot easily get information on the type of business, its size, number, and type of violations by industry, and the fines assessed and collected. Because this information is manually collected and not readily accessible, program officials said that they could not effectively adjust or target the field's effort to enforce compliance or educate employers about the act's requirements.

Further, we found and reported<sup>2</sup> that the lack of investigative data hurts the quality of follow-up investigations of sanctioned employers. For example, information such as previous agreements reached with the employer and reasons for reducing initial fines is not being documented. This historical information is needed to (1) appropriately fine and discourage employers from continually hiring unauthorized aliens and (2) measure progress in implementing the act.

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## Incomplete and Inaccurate Information Hinders Criminal Alien Deportation

Criminal aliens who have been convicted and jailed for committing felonies such as homicide, auto theft, and narcotics possession and distribution may avoid being deported because information is not readily available. According to INS enforcement officials, the Service may not be able to find and deport criminal aliens because it cannot quickly determine the alien's location or status (e.g., has the alien been tried, convicted, served time, or been released) within the judicial process. INS-wide information systems cannot easily share and electronically exchange data. Routine sharing and exchange of data from six INS information systems and seven external law enforcement systems, such as the Narcotics and Dangerous Drugs Information System, is needed to effectively investigate criminal aliens. Currently, field staff must make separate inquiries into each system to investigate the background of a criminal alien.

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<sup>2</sup>Immigration Reform: Employer Sanctions and the Question of Discrimination (GAO/GGD-90-62, Mar. 29, 1990).

The management information systems that help INS monitor and manage aliens who are apprehended, detained, or deported from the country may not be readily accessible and may contain inaccurate data. We reported<sup>3</sup> in 1987 that a high percentage of the criminal aliens deported from the New York City area are not listed in the information systems used to screen aliens' entry into the country. INS reported<sup>4</sup> that when accessing its automated system on deported aliens, needed information may not be available over half the time because most of the data are kept on paper records. Further, we found that data contained in a detention center's system<sup>5</sup> did not accurately reflect the number of illegal aliens at this center. In order to obtain an accurate number of aliens, the center must perform a physical count. A physical count on March 21, 1990, showed that the system had a different number of aliens listed than were actually at the center. In this case, 153 aliens (12 percent of the center's population) were still listed in the system although they were no longer at the center. According to supervisory deportation officers, inaccurate information could be caused by (1) inadequate data verification, (2) data entry backlogs, (3) missing case files, or (4) inadequate user training.

## Ineffective Processing of Aliens' Benefits

Immigration examiners cannot always quickly access data needed to process an alien's application for benefits. Examples of benefits include authorization to engage in employment, as well as being eligible for naturalization, asylum, or refugee status. Examiners may need information from an alien's paper file, personal interviews, and at least eight INS information systems to process an application. Because of the limited capability to electronically exchange data among information systems and the dependency on aliens' paper files, obtaining information, such as an alien's immigration history, is a time-consuming process. According to an operations official in the Western Region, examiners could cut the time spent searching alien records if they could access California's electronic fingerprint system. This system links up with other external law enforcement systems and could help identify criminal

<sup>3</sup>Criminal Aliens: Majority Deported From the New York City Area Not Listed in INS' Information Systems (GAO/GGD-87-41BR, Mar. 3, 1987). We reported similar problems in five other cities in a related report, Criminal Aliens: INS' Enforcement Activities (GAO/GGD-88-3, Nov. 10, 1987).

<sup>4</sup>INS' Tactical Plan for Automated Information Systems, FY 1989-1993, March 1989.

<sup>5</sup>The Port Isabel Service Processing Center in Los Fresnos, Texas, uses INS' Deportable Alien Control System to identify an alien by name, nationality, case file number, etc. and to keep track of aliens who are being held for deportation.

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aliens. The fingerprint information could help prevent immigration examiners from giving benefits to unauthorized aliens.

After assessing the benefits applications process, INS' Adjudications Division concluded that information system weaknesses have contributed to inappropriate and inconsistent decisions on alien benefits. INS' information problems have also contributed to application backlogs. As of March 1990, the Los Angeles District had about 62,000 applications pending; at that district it takes about 2 years to process an application for asylum and 17 months for citizenship applications.

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## Financial Management Information Is Unreliable

INS' executives and managers do not have the financial management information needed to control funds, evaluate the Service's financial status, or facilitate decision-making.<sup>6</sup> The accounting and financial management information systems containing data on allocations, obligations, and expenditures are inaccurate, incomplete, and outdated. According to INS, its financial accounting system is obsolete and needs a major redesign. Moreover, the system is labor intensive and cannot efficiently respond to changing information requirements. As a result, managers have developed redundant, ad hoc manual and automated information systems to control funds. For example, to comply with a Commissioner's request for personnel expenditures, the Comptroller had to manually pull together data on INS staffing levels and costs.

INS' 1989 Financial Integrity Act<sup>7</sup> report indicated that the Service has not been able to take appropriate and timely action to recover breached surety bonds. These bonds are used to assure an alien's appearance at deportation hearings. INS stated that it had problems billing, collecting, and litigating breached bonds because it lacked accurate and readily available information on those bonds. While the amount of outstanding breached bonds is unknown, INS officials estimate there are tens of millions of dollars owed to INS for breached bonds and other penalties.

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<sup>6</sup>We will discuss INS' extensive financial management problems in more detail in a separate report.

<sup>7</sup>The Federal Managers' Financial Integrity Act of 1982 (31 U.S.C. 3512 (b) and (c)) gives agency management the primary responsibility for maintaining adequate systems of internal control and accounting.



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## Management Information Is Inadequate to Monitor Program Performance

Along with the mission-related problems described above, INS also has problems with the administrative information used by its managers. The Service's primary management information system—the Performance Analysis System—is a central office data base that captures data from 2,500 paper reports submitted monthly by INS' 285 reporting offices. It provides computer printouts containing work load and resource expenditure data. It was designed to help Central Office program managers monitor field resources. However, the National Research Council reported<sup>8</sup> that despite widespread use of the data, there is a pervasive skepticism among program and policy analysts about the accuracy and comparability of the information. The data are considered neither accurate enough nor appropriate for office or employee evaluation. Our assessment also found that the system's information is inaccurate and outdated, and as such cannot adequately measure program performance and field office productivity.

The information in the system is not always accurate because field offices may enter wrong and incomplete information. For example, a Los Angeles Assistant District Director said that, in processing benefit applications, examiners must manually record the number received and completed, as well as track the time spent and the outcome of each case. Because of the large amount of applications and recordkeeping involved, examiners tend to make counting errors or put numbers in the wrong columns on the form used to gather statistics. Further, district field office supervisory inspectors said that some port-of-entry data, such as traffic counts, have been inflated to justify more personnel or overtime shifts. They also said that when field staff are busy, they may not be able to enter inspection data (e.g., people entering the country, number of inspectors, time spent on inspections, etc.) into the system.

Also, the information is outdated and consequently of limited use. The process to enter information in the central data base is slow and unwieldy. Currently, hundreds of locations manually fill out forms and mail them to the Central Office for key punching, editing, and entry into a computerized data base. It can take up to 6 months from the time an event occurs in the field until it is entered into the reporting system. Further, since the computer printouts may not yield the desired analytical information and some program managers have difficulty accessing and pulling data from the system's central data base, additional time is

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<sup>8</sup>Immigration Statistics: A Story of Neglect, Panel on Immigration Statistics, Committee on National Statistics, Commission on Behavioral and Social Sciences and Education, National Research Council (Washington, D.C.: 1985), p. 52.

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lost. For instance, program managers who are not proficient at using the centralized system have had a redundant system set up and have the data from the printouts entered into their unit's personal computers for analysis.

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### Corrective Steps Initiated, Yet Information Problems May Persist

INS has started several automated projects to enhance data availability and the efficiency of information systems. For example, the Service is developing an automated capability for obtaining data from other federal, state, and local law enforcement agencies and has identified the need for an information system to improve management reports. Also, the INS is working with the U.S. Customs Service and Department of State in developing a consolidated information system to support port-of-entry inspections. In addition, regions have identified and are developing several systems to meet their own information needs. However, these initiatives are not based on a consistent, comprehensive INS-wide information needs analysis and as such, this as well as other factors may hinder the effective development and implementation of these initiatives.

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### Factors Hindering Effective IRM

Despite INS' efforts to enhance its information systems and support critical mission information needs, progress has been slow. Several factors have contributed to this. Specifically, while INS developed an IRM long-range plan establishing goals and detailing system modernization initiatives, the plan does not provide needed direction because it is not based on an information analysis and a formal agencywide planning process that clearly outlines INS' mission.<sup>9</sup> As a result, system initiatives are fragmented and systems supporting different agency programs cannot electronically exchange and share data. Further, the decentralized, autonomous regional structure and system development problems—delays and ineffective, hard-to-use systems—have contributed to the field's development of redundant and incompatible information systems. This has a negative impact on both mission accomplishment and use of resource dollars. INS-wide IRM policies have not been implemented and this has also contributed to the fragmented systems environment. Finally, the Department of Justice and INS do not have comprehensive evaluation programs to assess the effectiveness of IRM, as required by the Paperwork Reduction Act of 1980.

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<sup>9</sup>As part of this ongoing management review, details on INS' agencywide planning process will be discussed in another report, which will be issued in the near future.

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## IRM Plan Provides Inadequate Direction

Our recent symposium<sup>10</sup> on managing information technology in the government brought together leaders from industry, the Congress, and executive agencies. The symposium participants agreed that a successful IRM program begins with a top manager who has a clear vision of how effective management of information resources can benefit the organization, a commitment to making this vision a reality, and an architecture for implementing this vision. An architecture is a blueprint which explains the structure and relationships among the agency's information resources and identifies needed systems, as well as systems that must exchange or share data. It gives management a clear plan for how information technology resources will fit into the agency's overall strategy and dictates critical characteristics of the equipment and resources required. Without clear direction and support from agency leadership, IRM initiatives tend to degenerate into loose collections of independent information systems. Often these systems are designed by program managers who focus on their individual unit's needs rather than the organization's larger mission and goals.

INS' efforts over the past decade to develop an effective IRM framework have encountered several of the problems addressed in our symposium. In the early 1980s, in response to congressional concerns about the lack of planning and information needs assessment, INS assessed the information needs of each major program and initiated a long-term plan to support these needs with technology. However, in 1983, in an effort to speed up system acquisition and software development, INS management deviated from the plan's outline and began an accelerated, ad hoc modernization of its information systems.

We evaluated a major part of this effort—a multimillion-dollar systems acquisition—and reported<sup>11</sup> in 1986 that because of inadequate internal controls, INS (1) violated federal procurement regulations in awarding a \$61.3 million contract for computer systems acquisition, (2) paid too much, and (3) bought equipment without the clear statement of the agency's ADP requirements. Once again, the Congress directed that INS review its modernization program and not use any funds for systems development or technology acquisition, beyond what had already been

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<sup>10</sup>Meeting the Government's Technology Challenge (Oct. 4 and 5, 1989) provided a forum that brought together top-level executives responsible for implementing IRM programs to explore better ways of using information technology.

<sup>11</sup>ADP Acquisitions: Immigration and Naturalization Service Should Terminate Its Contract and Recompete (GAO/IMTEC 86-5, Mar. 20, 1986).

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ordered. In response, INS contracted with the Federal Computer Performance Evaluation and Simulation Center to analyze and evaluate system architectures for INS in terms of cost, performance, and other characteristics. The scope of this study focused on the computer capacity and equipment needed to process existing and planned transactions. It did not, however, analyze INS-wide information needs and then develop an architecture based on these needs. Specifically, the study did not identify what data (1) exist and where they reside, (2) need to be shared, and (3) need to be developed and collected. As a result, there is no assurance that the architecture selected can best meet INS' information needs.

Without an effective architecture based on information needs, INS' current IRM plan does not provide the guidance needed to develop an efficient and effective IRM program. While the plan has conceptually sound goals, (such as effectively integrating information systems throughout the agency) INS' plan does not provide the vision or explain how it is going to meet these goals. INS' Office of Information Systems established priorities, at the direction of the Department of Justice, but the Service has no assurance that these priorities will effectively meet INS' overall needs. The Office of Information Systems has also recognized the importance of updating the Service's information needs analysis and incorporating the results of this analysis into an architecture. However, at the time of our review, agency leadership had not committed the time and resources needed for this task. In commenting on our assessment of INS' IRM planning efforts, the Department of Justice IRM officials emphasized that it was also very important for the Commissioner to take the lead in setting the Service's IRM priorities.

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### System Development Efforts Are Not Always Coordinated

Automated information systems developed by field offices to meet specific administrative and program management needs are not always coordinated among INS' central and regional offices. As a result, redundant systems are being developed, which are expensive and not the best use of the agency's scarce resources. For example, INS' Eastern Regional Office has been developing a field office funding system since December 1987, to track the allocation of funds to field offices and to electronically enter field obligations into the Central Office's main accounting system. INS' Northern Region also needed to track funds and record its obligations, but chose to develop its own automated system because the Eastern Region's funding system was still being developed. Further, the Central Office developed a criminal alien tracking system, but district offices in the Eastern and Southern Regions found that this did not meet

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their needs so they developed their own tracking systems. Finally, both the Central Office and Eastern Region are developing information systems to control illegal alien immigration and smuggling. Despite Central Office's instructions to the region to halt development, the region is proceeding with its redundant system.

INS' Office of Information Systems officials recognize that field offices are using a number of locally-developed information systems that have not been coordinated with or approved by the Central Office. Several factors have contributed to the development of redundant systems. First, Central Office systems development efforts are often delayed and do not always meet the needs of the regions. According to IRM officials, these specific problems are likely to occur when program managers are not fully committed to the project and funding is restricted. Second, because of the decentralized structure—regional, district, and Border Patrol offices—INS regions exercise extensive control over their operations.<sup>12</sup> Finally, while INS may have put policies and procedures in place to ensure coordination, they have not been fully implemented.

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## Progress in Developing and Implementing Policies

INS' policies to standardize system development efforts have not always been followed; as a result, the Service recently developed detailed guidance to encourage offices to follow these policies. Policies can help ensure that separate, autonomous organizational entities develop compatible information systems that can share information across the agency and cut down on systems duplication. Specifically, systems development standards governing documentation, testing, and training will minimize the number of system variations, simplify the maintenance program, and help provide the skills needed to effectively use the systems.

In some cases, INS policies have not been followed in developing and implementing information systems. For example, a top-level official in INS' Office of Information Systems said the Eastern Region does not always follow system development life-cycle procedures. In developing the Field Office Funding System, the Eastern Region did not obtain user suggestions on system changes, adequately document the design changes, or prepare an acceptance test or training plan. The region agrees that it did not fully comply with the policies and, at the request

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<sup>12</sup>As part of this ongoing management review, details on INS' decentralized organizational structure and budgeting process will be discussed in another report, which will be issued in the near future.

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of Central Office information resource officials, plans to update and prepare the needed documentation.

Further, an INS Assistant Commissioner emphasized the need for more IRM agencywide life-cycle development policies. As a result, INS has been developing policies that will require system development teams to follow the Service's system development life-cycle guidelines. For example, at specific points in a system's development, the team will be required to prepare program documentation, user manuals, and system plans. These policies will also require identifying existing information systems that will share or exchange data with the system being developed. Implementing these types of policies will improve the coordination, sharing, and efficient use of information.

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### Comprehensive Program Evaluation Lacking

An evaluation of an agency's information management can find IRM problems and provide alternatives for fixing them. In addition, it's required by the Paperwork Reduction Act of 1980. However, neither the Department of Justice nor INS has made a concerted effort to assess how well INS is managing its information resources as a whole. Their evaluations have focused on specific information systems and have not addressed the effectiveness and efficiency of INS-wide IRM. Although the Department reviewed INS' ADP planning documents and conducted a special audit of INS' operations in February 1989, it has not done an overall assessment. Department officials said that limited resources prevented them from analyzing INS' IRM program more extensively. INS' assessments of its IRM activities have pin pointed specific system-related problems and have somewhat improved existing systems; however, because the internal evaluations are narrow in scope and few in number, INS has not realized the full potential of an effective IRM review program.

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### Conclusions

INS has an immense task in preventing the illegal entry of aliens and helping aliens seeking citizenship, asylum, or other benefits. The difficulty of this task is compounded by its inability to solve its longstanding information problems. It has invested considerable time and resources over the past decade setting up a planning process and developing information systems, with little benefit. INS' planning at the start of the decade addressed many of its information problems, but top management, in an effort to speed up system acquisition and software development deviated from its long-range plans. Consequently, the actions that followed were shortsighted, piecemeal, and ineffective. Specifically, the

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systems were designed to meet individual program needs and could not exchange data across INS programs.

INS' recent initiatives to improve its management of information can provide the foundation needed to build an effective IRM program. However, a number of obstacles will have to be removed before these initiatives can work. For example, the autonomy of field units has (1) fostered ad hoc, redundant information systems; (2) discouraged coordination among organizational components; and (3) wasted scarce resources. This barrier could be eliminated or diminished if Central Office and field program managers forge a strong IRM partnership and reach a consensus on the information needed to administer INS' programs.

Further, to a large extent, the current planning focus has been on automating existing manual processes, building new information systems to meet specific program needs, and modernizing existing systems, rather than developing new interconnected systems capable of sharing information. INS needs to recognize that information is an essential corporate asset. INS will realize a return on this asset only if it clearly defines its information needs and provides a long-term vision of how these needs can be supported by information technology. To ensure that critical initiatives are implemented and existing barriers are overcome, the INS Commissioner will need to exercise strong leadership and make a long-term commitment to implementing an effective information resources management program.

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## Recommendations

We recommend that the Attorney General direct the INS Commissioner to take a leadership role in defining the information needs of the Service and developing an architecture that will provide sufficient guidance in creating an efficient and effective IRM environment. This would include revising the Service's long-range IRM plan and its corresponding priorities and should (1) be directed by a full-time project manager who will ensure a joint and coordinated effort among headquarters and field IRM officials and program managers, (2) identify existing and planned information systems that contain redundant information, and (3) ensure top management commitment and resources needed to implement this long-term effort.

We also recommend that the Attorney General strengthen the Department of Justice's IRM review program and direct the INS Commissioner to follow the Attorney General's lead in broadening the focus and frequency of IRM reviews. An aggressive review effort by the Department

and INS will help ensure that the Service creates a fully integrated information systems environment.

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## Agency Comments and Our Evaluation

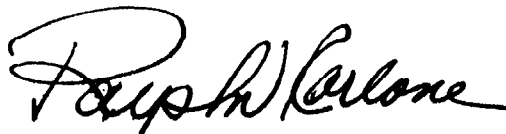
GAO requested written comments on a draft of this report from the Department of Justice. Their comments are summarized below and reproduced in appendix II.

The Office of the Assistant Attorney General for Administration generally agreed with our findings and noted that INS' Commissioner has recently begun to act on our recommendations. In July 1990, the Commissioner of INS designated a project manager to evaluate the Service's information needs and develop an information architecture. The newly appointed manager should use INS' Information Systems Advisory Group, established several years ago, as a forum for discussing IRM issues. Because the group has field office and headquarters representation, it could foster a strong IRM partnership and help reach consensus on the data needed to administer INS' programs.

The Department's response noted that INS recently proposed a reorganization to strengthen the relationship of the Central Office to its field units. We have not reviewed INS' proposed reorganization because it has not been finalized. Even if this reorganization successfully realizes INS' objectives, the Service still faces a formidable challenge in improving the efficiency and effectiveness of IRM. Consequently, top management needs to continue to place priority on and provide resources to implement this long-term effort.

We are providing copies of this report to interested members of the Congress, executive branch agencies, and the public. We will also make copies available to others upon request. This work was performed under the direction of Jack L. Brock, Jr., Director, Government Information and Financial Management, who can be reached at (202) 275-3195. Other major contributors are listed in appendix III.

Sincerely yours,



Ralph V. Carlone  
Assistant Comptroller General





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## Abbreviations

ADP	automated data processing
AIS	automated information systems
DOJ	Department of Justice
GAO	General Accounting Office
IMTEC	Information Management and Technology Division
INS	Immigration and Naturalization Service
IRM	information resources management



# Objective, Scope, and Methodology

Our objective was to assess how effectively INS officials at headquarters and field offices manage their information resources to support the Service's mission. To identify long-standing problems and obtain a historical perspective of INS, we analyzed earlier reports issued by us, the Department of Justice's Management Division and Inspector General, as well as management studies by consultants and others. We conducted our work from October 1989 through August 1990 at the Department of Justice in Washington, D.C.; INS' Headquarters in Washington, D.C.; and at INS' Regional Offices in California, Minnesota, Texas, and Vermont. Field work was also done at INS' District Offices in Dallas, El Paso, and Harlingen, Texas; New York City, New York; San Diego and Los Angeles, California; and at INS' Border Patrol Sectors in San Diego, California, and McAllen, Texas.

We interviewed senior IRM officials and management at the Department of Justice and INS to discuss the Service's information problems and needed corrections. Further, to gain an understanding of the field's perspective we interviewed INS' three Regional Commissioners and the Northern Region's Acting Regional Commissioner. At INS' District Offices and Border Patrol Sectors we interviewed the District Directors, Border Patrol Sector Deputy Chiefs, and program managers. We also reviewed INS' IRM policies, budget, information plan, program documents, and relevant reports and legislative documents. Further, we interviewed the Director, Systems Evaluation Division, of the Federal Computer Performance Evaluation and Simulation Center to discuss the scope of work performed in analyzing and evaluating alternative information system architectures for INS. We also had a consultant help analyze INS' information resource problems and develop specific recommendations. Finally, as a part of this ongoing management review, our General Government Division administered a comprehensive questionnaire to INS managers. This questionnaire covered organization, human resources, and management practices. In addition, we incorporated a set of questions on information resources issues. We mailed the questionnaire in December 1989, to 2908 managers. We defined managers as employees at the grade 13 level or above and INS designated managers, based on their position title. We had an overall response rate of 83.95 percent on the questionnaire.

Our work was performed in accordance with generally accepted government auditing standards. INS provided written comments on a draft of this report. These comments are presented and evaluated briefly in the body of this report, and are included in full in appendix II.

# Comments From the Department of Justice



U.S. Department of Justice

Washington, D.C. 20530

AUG 21 1990

Lowell Dodge  
Director, Administration of Justice Issues  
General Government Division  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Dodge:

The following information is being provided in response to your request to the Attorney General, dated July 23, 1990, for comments on the General Accounting Office (GAO) draft report entitled, "Information Resources: Long-term Commitment Needed to Improve INS' Information Resources." In general, the Department agrees with GAO's findings, however, we believe that more attention should be given to the Department's and INS' ongoing efforts to improve INS' IRM. We would like to take this opportunity to discuss our more significant activities in this area.

The current Commissioner, INS, is aggressively promoting IRM planning and management. Recognizing that previous automation initiatives have not been based on a consistent comprehensive INS-wide information needs analysis, he has initiated an information architecture study to evaluate INS information needs Service-wide. To ensure adequate coordination and cooperation in this effort, the Assistant Commissioner, Systems Integration Division, has been designated its project manager. INS also has established an Information Systems Advisory Group comprised of Office of Information Systems managers, ADP representatives from its regions and representatives from each major program office. This group meets quarterly to discuss and resolve organizational issues involving IRM. Further, INS has proposed a reorganization to strengthen the relationship of the Central Office to its field elements. The proposal is currently under departmental review.

The Department has followed a practice of conducting regular, periodic evaluations of planned and existing automated information systems in order to ensure adequate oversight of all IRM processes within the Department. The Systems Policy Staff (SPS), the Department's principal IRM policy staff, reviews all strategic and tactical plans, proposed systems and related support acquisitions, budget submissions and security plans. SPS also manages the Information Collection Budget/Public Use Report Program and monitors component performance against program goals and Administration policies. These reviews are augmented by SPS

Mr. Lowell Dodge

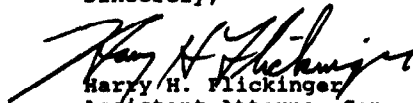
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site visits and project briefings in order to better understand component requirements and project status. Other Department controls over IRM include the review of information resource procurements, internal controls, financial management and budget submissions. Additionally, the Inspector General is authorized to conduct a wide variety of reviews concerning IRM program activities.

INS IRM is subject to all the above oversight activities. An example of SPS efforts is its annual review of INS' Tactical Plan. This is a major review in which SPS verifies adherence to the Department-wide plan and compliance with Federal regulations and Department policies and standards. SPS also ensures that an appropriate level of system planning and documentation characterizes each of the phases of the system's life cycle. According to SPS' review, the most recent INS Tactical plan showed a significant improvement in INS' planning process.

We believe these actions demonstrate the Department's and INS' commitment to improving INS' IRM. We appreciate the opportunity to comment on the draft report and hope that you find our comments both constructive and beneficial.

Sincerely,

  
Harry H. Flickinger  
Assistant Attorney General  
for Administration

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