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Report to Congressional Requesters

March 2006

INFORMATION TECHNOLOGY

Near-Term Effort to Automate Paper-Based Immigration Files Needs Planning Improvements

GAO-06-375

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GAO Accountability · Integrity · Reliability

Highlights

Highlights of GAO-06-375, a report to congressional requesters

Why GAO Did This Study

The United States Citizenship and Immigration Services (USCIS) relies on about 55 million paper-based files to adjudicate applications for immigration status and other benefits. Ensuring the currency and availability of these manual files, referred to as alien files, or A-Files, is a major challenge. To address this challenge, USCIS has initiated efforts, both long and near term, to automate the A-Files. The long-term effort is now being re-examined within the context of a larger USCIS organizational transformation initiative. In the near term, USCIS has begun a digitization program, which it estimates will cost about $190 million over an 8-year period to electronically scan existing paper files and store and share the scanned images. GAO was asked to determine whether USCIS was effectively managing its A-Files automation efforts.

What GAO Recommends

GAO is making recommendations to the Secretary of Homeland Security to help ensure that USCIS's long-term organizational transformation initiative is effectively managed and that improvements are made to USCIS's planning for its near-term A-Files digitization and document management effort. In written comments on a draft of this report, the Department of Homeland Security agreed with our recommendations and described actions that are planned and under way to address them.

www.gao.gov/cgi-bin/getrpt?GAO-06-375.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Randolph C. Hite at (202) 512-3439 or hiter@gao.gov.

What GAO Found

USCIS's effectiveness in managing its long-term effort for automating the A-Files cannot yet be determined because the scope, content, and approach for moving from paper-based to paperless A-Files has yet to be defined. Nevertheless, GAO believes that USCIS's recent decision to re-examine prior agency plans for a strategic A-Files automation solution within the context of an agencywide transformation strategy appropriately recognizes the integral support role that information technology plays in organizational and business transformation. GAO also believes that the success of USCIS's organizational transformation depends on other key supporting practices, such as having a comprehensive and integrated transformation plan (goals and schedules) and results-oriented performance measures. With respect to USCIS's near-term A-Files automation effort, known as the Integrated Digitization Document Management Program, effective planning is not occurring. In particular, USCIS has not developed a plan governing how it will manage this program and its contractors, and it has not developed an evaluation plan for its ongoing digitization concept of operations pilot test, even though it has either awarded or plans to award contracts totaling about $20 million for this pilot. In addition, USCIS officials told us they do not yet know which A-Files immigration forms will be scanned. Without a defined scope and adequate planning, this program is at risk of falling short of expectations.

A-Files Storage at National Records Center in Lee's Summit, Missouri

Source: DHS.

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Abbreviations

A-Files	alien files
CBP	Customs and Border Protection
CIS	Central Index System
CLAIMS 3	Computer Linked Application Management System 3
DHS	Department of Homeland Security
FBI	Federal Bureau of Investigation
ICE	Immigration and Customs Enforcement
IDDMP	Integrated Digitization Document Management Program
IG	inspector general
IT	information technology
NBC	National Benefits Center
NFTS	National File Tracking System
OCIO	Office of the Chief Information Officer
USCIS	U.S. Citizenship and Immigration Services
US-VISIT	U.S. Visitor and Immigrant Status Indicator Technology

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Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, D.C. 20548

March 31, 2006

The Honorable Susan M. Collins
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Charles E. Grassley
Chairman
Committee on Finance
United States Senate

The United States Citizenship and Immigration Services (USCIS) within the Department of Homeland Security (DHS) relies on more than 55 million paper-based files, each containing between one and hundreds of pages of immigration information, to adjudicate applications for immigration status and other benefits. These alien files (A-Files) are kept for 75 years, and the data contained in these files are also used by federal, state, and local agencies.

Ensuring the currency and availability of these paper files to support a range of agency mission needs is a major challenge for USCIS. To address this challenge, USCIS plans to pursue both long-term and near-term A-Files automation efforts. While the scope, content, and approach to its long-term efforts have not yet been defined, in the near-term, USCIS has begun the Integrated Digitization Document Management Program (IDDMP), which it estimates will cost about $190 million over an 8-year period. This program provides for electronically scanning paper forms and associated documents contained in the A-Files, storing the resulting electronic images, and providing user access to the images. Thus far, USCIS has either awarded, or plans to award, five contracts to pilot test a digitization concept of operations. These contracts are being funded primarily with funds that were set to expire by the end of September 2005.

As part of your request that we review USCIS's management and use of the A-Files, we agreed to determine whether USCIS was effectively managing its A-Files automation efforts. To accomplish this objective, we reviewed available plans and contractor statements of work pertaining to the automation efforts. We conducted our review from August 2005 through February 2006 in accordance with generally accepted government auditing standards. Details on our objective, scope, and methodology are provided in appendix I.

Results in Brief

It is too early to determine how effectively USCIS's long-term A-Files automation effort is being managed because the scope, content, and approach for moving from paper-based to paperless A-Files have yet to be defined. The agency recently decided to re-examine this long-term effort within the context of an agencywide organizational and business transformation initiative, but it has not formally documented this transformation initiative. Nevertheless, we support the concept of aligning strategic automation of the A-Files with a transformation of USCIS business operations, as this concept recognizes and reflects the support role of information technology (IT) in organizational transformation. As USCIS moves forward with what it is calling its Transformation Strategy, it will be important for the agency to leverage a number of interdependent transformation enablers that we have previously reported as keys to success, such as having strong executive leadership; establishing a comprehensive and integrated transformation plan (e.g., goals and schedules); adopting effective management processes, information systems, and related best practices (e.g., use of an enterprise architecture); and employing results-oriented performance measures.

USCIS is not effectively managing key planning activities associated with its near-term A-Files automation effort, known as the Integrated Digitization Document Management Program (IDDMP). In particular, it has not yet developed a plan governing how it will manage this program and the contractors working on it, and it has not yet developed a plan for measuring and evaluating the results of a pilot test of a document scanning and storage capability. According to USCIS officials, these plans do not exist because the program is just getting started. Nonetheless, USCIS has already awarded, or plans to award, contracts totaling more than $20 million for this pilot. In addition, USCIS officials told us they do not yet know which of the roughly 50 types of A-Files-related forms will be scanned as part of the program. Without a defined program scope and adequate program planning, IDDMP is at risk of falling short of expectations.

To assist USCIS in its future transformation efforts, we are making recommendations to the Secretary of Homeland Security aimed at ensuring that certain keys to successful organizational transformation are employed. We are also making recommendations to the Secretary for improving IDDMP planning.

In written comments on a draft of this report, the Department of Homeland Security agreed with our recommendations. In its letter, which is reprinted in appendix II, the department described actions it is taking, and plans to take, to address our recommendations. It also provided technical comments that we have incorporated, as appropriate.

Background

A mission of USCIS is to provide timely and accurate information and services to immigrant and nonimmigrant aliens as well as to federal employees who make informed decisions about, for example, granting citizenship and approving immigration benefits. To perform this mission, staff dispersed among approximately 89 of USCIS's field offices[1] require, among other things, access to an alien applicant's case history information. Currently, this information resides primarily in the paper-based A-Files.

To improve the reliability and currency of the A-Files, as well as their accessibility to geographically and organizationally dispersed users, USCIS intends to automate the A-Files, beginning with scanning certain forms contained in the A-Files and storing the resulting electronic images. While these automation efforts were to be part of their IT Transformation Program, both A-Files automation and the IT Transformation Program were recently incorporated into an agencywide organizational and business transformation effort referred to as the USCIS Transformation Strategy.

A-Files Are Important to Mission Operations of USCIS and Other Agencies

A-Files are a critical component of the USCIS mission of ensuring the integrity of the immigration system. These files are used by USCIS staff to make immigration and citizenship decisions. Maintaining the currency of these files and distributing them in a timely manner has been a long-standing challenge.

An A-File is the set of records USCIS maintains on certain individuals to document their interaction with USCIS in actions prescribed by the Immigration and Nationality Act and other regulations. The single most important set of records kept by USCIS are A-Files. An A-File contains between one and hundreds of pages of documents and forms, such as

[1]According to agency officials, of USCIS's approximately 250 offices, 89 are considered file control offices. A file control office is an office that is authorized to create, store, transfer, receive, maintain, and retire A-Files.

submitted benefits and naturalization forms, photographs, fingerprints, and correspondence from family members or third-party sponsors. According to USCIS, A-File information is used to

- grant or deny immigration-related benefits,
- capture subsequent status changes,
- prosecute individuals who violate immigration law,
- document chain of custody for enforcement,
- provide immigrant statistics,
- control and account for records in compliance with the code of federal regulations, or
- certify the existence or nonexistence of records.

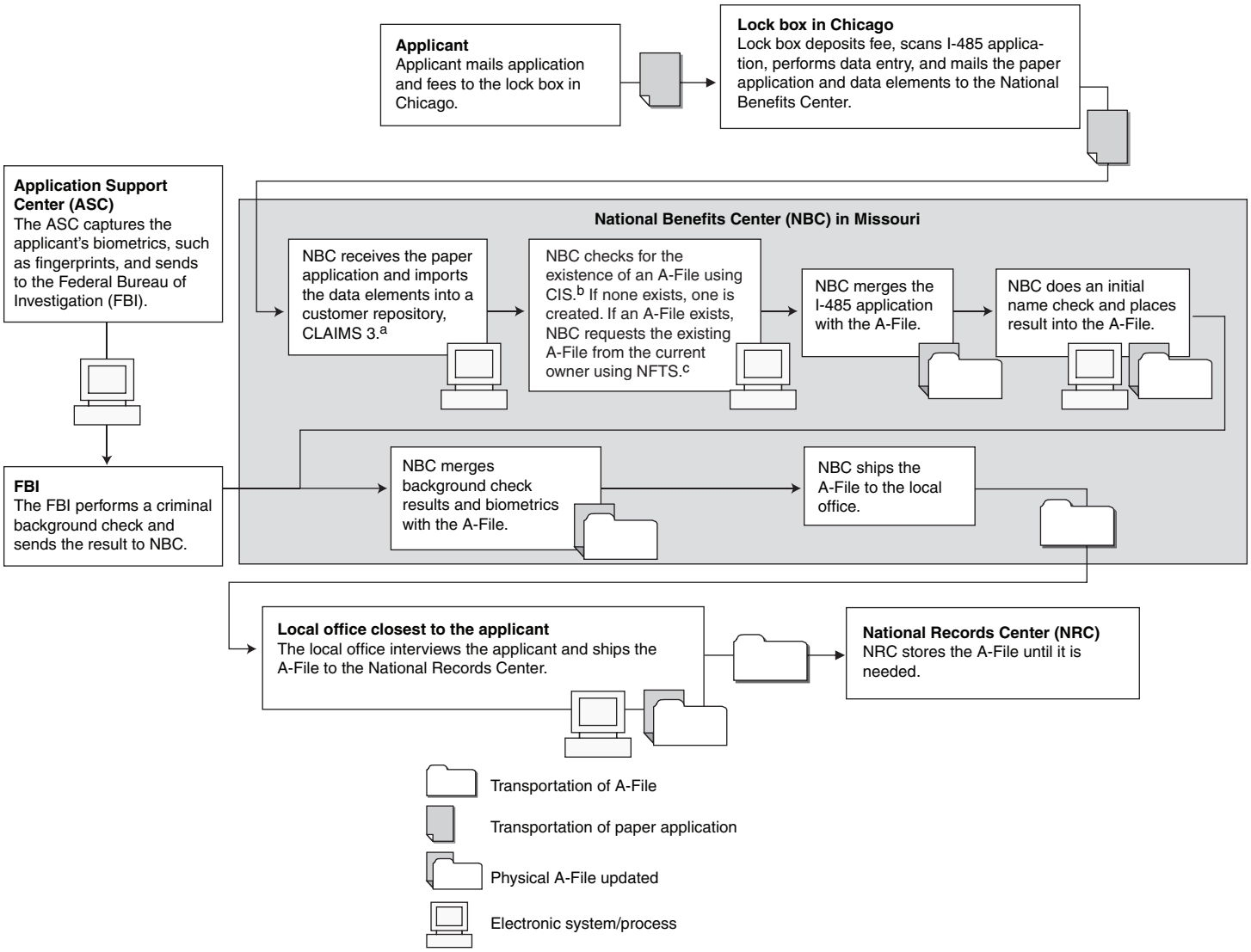
USCIS estimates that it currently has more than 55 million of these paper-based files, each of which is to be maintained for a 75-year period.[2]

Generally, USCIS processes for adjudicating alien benefit requests vary by type of application or form, and may involve creating, searching, transporting, obtaining, examining, updating, or storing the A-File. Figure 1 is an example of one such process: the Family-Based Adjustment of Status, also referred to as the Application to Register Permanent Residence, or Form I-485.[3] The process of submitting this form involves both manual and automated steps.

[2]According to USCIS program officials, the 75-year storage period is a National Archive and Records Administration requirement.

[3]Form I-485 is one of the more complex forms and business processes that USCIS uses. It is used by adjudicators to make decisions on granting permanent residency to alien applicants.

Figure 1: Family-Based Adjustment of Status Application (Form I-485) Process



Source: GAO analysis of USCIS data.

[a]Computer Linked Application Management System 3.
[b]Central Index System.
[c]National File Tracking System.

As illustrated in figure 1, the alien submits the I-485, along with the required fee and supporting information, to a USCIS "lock box" in Chicago that is operated by the Department of the Treasury on behalf of USCIS.[4] Treasury then captures the form electronically and creates an extract file containing selected I-485 data elements that it sends in an electronic format to the USCIS National Benefits Center (NBC), along with the original paper form and supporting information. NBC prepares a daily upload file of all cases that need biometric appointments. This information is used to schedule an interview and direct the applicant to the Application Support Center, where biometrics, such as fingerprints, will be captured. NBC obtains the paper application and the selected electronic data elements, and inputs the data elements into the Computer Linked Application Management System 3 (CLAIMS 3).[5] In addition, NBC searches a USCIS electronic index system, known as the Central Index System (CIS), to determine whether an A-File already exists for the individual. If an A-File does not exist, one is created. If one does exist, NBC determines its location by accessing an additional system called the National File Tracking System (NFTS), which tracks the physical location of the A-File. When NBC obtains the requested A-File, it merges the Form I-485 into the A-File. NBC then performs an initial name check using the Interagency Border Inspection System and the Federal Bureau of Investigation (FBI) National Name Check Program, and updates the A-File with the results.

While NBC is processing the application, the Application Support Center is collecting the applicant's biometrics and sending the data electronically to the FBI, where a criminal background check is performed on the applicant. When the FBI has completed the background check, it sends the results to NBC, which then prints the results and adds them to the A-File.

When the A-File contains the I-485 application, biometrics, and background check results, it is transported to the USCIS local office closest to the applicant for a ruling on the applicant's request. The local office reviews the file, interviews the applicant, and makes a decision on the permanent residence request. The A-File is then transported to the National Records Center in Missouri for storage (see fig. 2).

[4]The purpose of the lock box is to provide a single mailing location for applications and a capability for accepting and depositing fees.

[5]CLAIMS 3 is a customer repository designed to provide funds control for fees collected with applications, record the results of adjudications for each benefit, and provide case status information to applicants. This system became operational in 1993.

Figure 2: A-Files Storage at National Records Center in Lee's Summit, Missouri

Source: DHS.

According to a recent report by the DHS Inspector General (IG), this paper-based process is costly.[6] For example, the estimated costs for copiers and copy paper for one USCIS service center is more than $400,000 per year. Further, according to senior USCIS officials, the agency spends approximately $13 million each year transporting A-Files within USCIS and to other bureaus and agencies.

Besides USCIS's need for A-Files, DHS's Immigration and Customs Enforcement (ICE), Customs and Border Protection (CBP), and U.S. Visitor and Immigrant Status Indicator Technology (US-VISIT) need access to either the data in the A-Files or the A-Files themselves, as do agencies external to DHS, including the FBI, the Department of State, and state and local governments. For example, USCIS officials told us that the FBI uses A-Files data in performing law enforcement activities. In addition, USCIS documentation shows that ICE uses A-Files as the principle source of information for prosecuting aliens who have committed crimes and for immigration removal proceedings; CBP uses A-Files when it interviews and arrests aliens; and the Department of State uses data within the A-Files when issuing visas to alien visitors. According to USCIS officials, obtaining access to these A-Files has been a long-standing problem.

[6]DHS, Office of Inspector General, *USCIS Faces Challenges in Modernizing Information Technology*, OIG-05-41 (Washington, D.C., September 2005).

USCIS Intends to Address Limitations in Its IT and Data-Sharing Environments

The limitations in the USCIS IT and data-sharing environments are not confined to the A-Files. According to a recent report by the DHS IG,[7] USCIS uses duplicative, nonintegrated, and inefficient data systems that have limited information sharing, resulting in data integrity and reliability problems. For example, adjudicators may need to access more than a dozen systems using between 5 and 17 passwords, and may have to restart these systems multiple times to process a given application. In addition, the IG reported that the networks and hardware platforms across USCIS offices are outdated and inconsistent. The IG also reported that past problems in this IT environment have led to small, disparate business process re-engineering initiatives that were narrowly focused and were not sufficiently coordinated across the organization to enable standardized processes.

To address these limitations, USCIS began an IT Transformation Program in March 2005 that was led by the agency's Office of the Chief Information Officer (OCIO) and was intended to move USCIS progressively toward a paperless environment that facilitates information sharing. In January 2006, USCIS reported that this IT transformation effort was being subsumed into a new, long-term organizational and business transformation effort, referred to as the USCIS Transformation Strategy. Under this strategy, according to USCIS officials, long-term solutions to its A-Files automation needs will be pursued within the context of business process re-engineering.

In the interim, however, USCIS still intends to reduce the volume of paper associated with its existing A-Files through a program called the Integrated Digitization Document Management Program (IDDMP). According to USCIS, the goals of the IDDMP are to

- comply with laws governing electronic information storage and access and information sharing;
- reduce the backlog of immigration benefit requests, ensure timely access to files, and reduce paper-based file storage and transportation costs; and

[7] OIG-05-41.

- respond to a statement in *The 9/11 Commission Report* that all points in the border system—from consular offices to immigration services offices—will need appropriate electronic access to an applicant's file.[8]

To accomplish these objectives, IDDMP is to convert paper forms and documents in existing A-Files to electronic images and manage the retrieval, movement, retention, and disposition of these images. The program is not intended to change existing USCIS core business processes, but rather to merely reduce the amount of paper associated with these business processes and improve user access to these scanned forms and documents. The program is estimated to cost about $190 million over 8 years, which includes planning, acquisition of hardware and software products and services, and operations and maintenance.

As part of the IDDMP, USCIS initiated a digitization and storage pilot to scan approximately 1 million A-Files that include adjudicated I-485 forms and supporting documents (each containing about 100 pages).[9] The purpose of the pilot is to validate that the digital format satisfies user needs, to identify network storage requirements, and to provide insight into potential scanning and storage problems. According to USCIS program officials, the pilot involves five separate contracts, three of which are primarily funded from $20 million that Congress had designated for "the historical records project to convert immigration records into an electronic, digitally-accessible format."[10] The other contracts were awarded using other USCIS funding. Officials told us that they needed to move quickly to obligate these funds before they were due to expire at the end of September 2005, so they awarded four of the contracts in September 2005. A description of each of the contracts follows.

[8]The National Commission on Terrorist Acts Upon the United States, *The 9/11 Commission Report* (Washington, D.C., July 2004), 388.

[9]USCIS officials stated that they are now considering modifying the scope of the pilot.

[10]House of Representatives Conference Report 108-774 to accompany H.R. 4567 (Oct. 9, 2004).

Records digitization facility. According to program officials, this contract is intended to set up a facility for scanning the piloted number of A-Files and for scanning future A-Files. The contract is to cover preparing the documents for scanning, scanning the documents, and performing quality assurance checks on the captured images. It also is to cover indexing the scanned images using the meta-data standards defined in the requirements definition contract portion of the digitization pilot and temporarily storing the images in a staging server until they are accessed under the enterprise document management service contract. According to officials, this contract was originally awarded in September 2005, and a protest was filed in October 2005. During the course of the protest, the agency took corrective action, which included re-evaluation of the proposal; the protest was dismissed, the original award was vacated, and a new award is expected in March 2006.[11] The estimated value of the new contract is $14 million.

Enterprise document management service. This contract, awarded in September 2005, is to gather technical requirements for the design and implementation of a system to electronically manage the scanned images created by the records digitization process. In addition, the contractor is to design and implement a system capable of ensuring image and data quality and compliance with the DHS document management standard. It also includes development of a Web infrastructure and implementation of user interface software components. The value of this contract is about $2.3 million.

Storage facility infrastructure. Under this contract, awarded in September 2005, the contractor is to provide hardware, software, and a wide area network for the digitization and storage process. The value of this contract is about $7.2 million.

Records business process re-engineering. This contract, which was awarded in September 2005, includes determining how I-485 A-Files are currently used for adjudicating permanent residence requests and documenting the process for compilation, movement, digitization, and lockdown of I-485 A-Files. The contractor is also to determine how to

[11]Fiscal year 2005 funds remain available for this contract pursuant to 31 U.S.C. § 1558, which generally provides that funds available to an agency for a contract at the time a protest is filed shall remain available for obligation for 100 days after the date a final ruling is made on the protest.

effectively relocate the I-485 forms to the records digitization facility. The estimated value of this contract is $487,400.

Requirements definition. This contract, which was awarded in October 2005 using fiscal year 2006 funds, covers gathering and documenting non-USCIS stakeholder digitization and document management requirements, including the meta-data requirements for indexing the scanned documents. As of December 2005, the first draft of requirements had been reviewed by USCIS and some of the external stakeholders, including ICE, CBP, and the Department of State. The contractor's next steps are to refine the requirements and develop, among other things, the plans of action and a concept of operations for the digitization and document management processes. The value of this contract is about $451,000.

USCIS Effectiveness in Managing Long-Term A-Files Automation Efforts Remains to Be Seen, but Near-Term Document Digitization Program Is Not Being Effectively Managed

It is not yet possible to determine the effectiveness of USCIS's management of its long-term A-Files automation effort because this effort is not yet under way. However, USCIS currently has a near-term A-Files automation effort under way (IDDMP) that it is not effectively managing. Specifically, USCIS has not developed a program management plan to guide program execution and provide the basis for reliable cost and schedule estimates, and it does not have a plan for evaluating its IDDMP concept of operations pilot test of a document scanning capability. According to USCIS officials, these plans do not exist because the program is just getting started. Nevertheless, five contracts have either been awarded or are to be awarded under this program, a pilot test is under way, and significant program costs are anticipated. Without effective planning, IDDMP is at risk of falling short of expectations and its funding requests cannot be justified.

Long-Term A-Files Automation Effort Is Being Re-evaluated; It Is Too Early to Determine Whether It Is Being Effectively Managed

As we have previously reported,[12] technology alone cannot be relied on to solve long-standing and fundamental business problems, such as USCIS's dependence on paper-laden A-Files. Instead, our work has shown that such organizational and business transformation requires a number of key, interdependent elements working collectively to effect meaningful and long-lasting institutional change and mission improvement. These elements

[12]See, for example, GAO, *National Aeronautics and Space Administration: Long-standing Financial Management Challenges Threaten the Agency's Ability to Manage Its Programs*, GAO-06-216T (Washington, D.C.: Oct. 27, 2005).

begin with strong, sustained executive leadership to direct and oversee organizational reforms. Other elements include a comprehensive and integrated business transformation plan, strategic management of human capital, effective processes and related tools (such as an enterprise architecture to provide a business and technology blueprint and associated road map), and results-oriented performance measures that link institutional, unit, and individual personnel goals, measures, and expectations.

Until recently, USCIS had high-level, technology-focused plans for modernizing its information systems environment, including plans for automating its A-Files. These plans were part of the OCIO's IT Transformation Program, which included four components: (1) establishing and evolving a mature CIO organization; (2) improving the IT infrastructure; (3) implementing an information-based architecture to facilitate information standardization, security, and sharing; and (4) providing new business capabilities. However, agency officials told us in January 2006 that the IT Transformation Program has been reconsidered and will now be incorporated into a broader effort referred to as the USCIS Transformation Strategy. While this broader organizational and business transformation strategy has yet to be formally documented, officials told us that the strategy will, among other things, align IT modernization with broader organizational and business process changes. Restated, the IT modernization will be neither separate from nor the driver of organizational transformation. Rather, it will support and enable organizational transformation. To illustrate, one approach to long-term A-Files automation could potentially involve doing away with both paper forms and electronic images of these forms and instead provide for the electronic capture of data when the applications are filed using Web-based services and management of the captured data via corporate data warehouses to facilitate data access and sharing.

USCIS's more broadly based organizational and business transformation concept, in which IT modernization will be treated as an enabler rather than an independent undertaking or a driver, is more consistent with effective transformation practices employed by successful organizations. However, our experience has shown that successful organizations also perform other key elements related to organizational and business transformation. As we have previously reported,[13] these elements are as follows:

- **Ensure top leadership drives the transformation**. Leadership must set the direction, pace, and tone and provide a clear, consistent rationale that brings everyone together behind a single mission.
- **Establish a coherent mission and integrated strategic goals to guide the transformation**. Together, these define the culture and serve as a vehicle for employees to unite and rally around.
- **Focus on a key set of principles and priorities at the outset of the transformation**. A clear set of principles and priorities serves as a framework to help the organization create a new culture and drive employee behaviors.
- **Set implementation goals and a timeline to build momentum and show progress from day one**. Goals and a timeline are essential because the transformation could take years to complete.
- **Dedicate an implementation team to manage the transformation process**. A strong and stable team is important to ensure that the transformation receives the attention needed to persevere and be successful.
- **Use the performance management system to define responsibility and assure accountability for change**. A "line of sight" shows how team, unit, and individual performance can contribute to overall organizational results.

[13]GAO, *Highlights of a GAO Forum: Mergers and Transformation: Lessons Learned for the Department of Homeland Security and Other Federal Agencies*, GAO-03-293SP (Washington, D.C.: Nov. 14, 2002).

- **Establish a communication strategy to create shared expectations and report related progress**. The strategy must effectively communicate with employees, customers, and stakeholders.

- **Involve employees to obtain their ideas and allow them to participate in the transformation**. Employee involvement strengthens the process and allows them to share their experiences and shape policies.

- **Build a world-class organization**. Building on a vision of improved performance, the organization adopts the most efficient, effective, and economical personnel, system, and process changes and continually seeks to implement best practices. One such practice is the use of an enterprise architecture.[14]

The degree to which USCIS incorporates each of these key elements into its current transformation efforts will help to determine the success of its efforts, including the automation of its A-Files.

USCIS Is Not Effectively Managing Its Near-Term A-Files Automation Effort

Industry best practices and information technology program management principles[15] stress the importance of effective planning in the management of programs, such as IDDMP. Inherent in such planning is the development and use of program management plans, which define, among other things, program goals and major milestones, delineate work tasks and products and the associated schedules and resources for achieving them, define management processes and structures (e.g., processes and structures for tracking and overseeing contractors), identify key players and stakeholders and their roles and responsibilities, and specify performance measures and reporting mechanisms. They also require plans for testing and evaluating program products and capabilities, including plans for evaluating the

[14]An enterprise architecture provides a clear and comprehensive picture of an entity—whether an organization (e.g., federal department or agency) or a functional or mission area—that cuts across more than one organization. This picture consists of snapshots of both the enterprise's current "as is" operational and technological environment and its target or "to be" environment, as well as a capital investment road map for transitioning from the current to the target environment. These snapshots further consist of "views," which are basically one or more architecture products that provide conceptual or logical representations of the enterprise.

[15]Institute of Electrical and Electronics Engineers, *IEEE/EIA Guide for Information Technology*, IEEE/EIA 12207.1 - 1997 (April 1998).

results of pilot-testing efforts. Pilot evaluation plans include goals and objectives, tasks, time frames, resource needs, roles and responsibilities, and evaluation criteria and results measures. Such plans are essential to ensuring, among other things, that programs are executed properly and that funding requests are reliably derived.

USCIS has yet to develop either an IDDMP management plan or a pilot evaluation plan. According to USCIS OCIO officials, the IDDMP is only now being initiated, and the program office, including program staff, is not fully in place. Thus, they said it is too early to expect these plans to exist. Nevertheless, USCIS has awarded four contracts and is in the process of awarding a fifth related to the program; these contracts total about $20 million, including an ongoing digitization and storage technology pilot test, and it estimates that it will spend $190 million over an 8-year period on the program. At the same time, officials told us they do not yet know which of the roughly 50 types of forms associated with A-Files will be scanned and stored or the sequence in which form types will be scanned. If all forms are scanned, information provided by USCIS shows that scanning and storage could cost as much as $550 million.

The absence of program planning was also noted in a December 2005 workshop by one of the digitization and storage pilot contractors. Discussion points during this workshop included IDDMP's lack of a clear vision and business objectives, critical gaps in the digitization approach, confusion regarding terminology and roles and responsibilities, and the lack of a management plan. Restated, this means that large sums of resources are being invested, and much larger sums are likely to be invested, on a program that lacks plans for ensuring that the resources are invested effectively and that resource estimates are valid. According to OCIO officials, while the funding estimates are a "guess," $20 million in funds were designated in fiscal year 2005 for converting historical immigration records into a digitally accessible format, and they needed to move quickly to obligate these funds before they expired at the end of September 2005. These officials also told us that, while they did not have time to fully establish and staff a program office that would have pre-empted the contractor's concerns, they are now taking steps to deal with the concerns. However, we have yet to receive documentation from USCIS as to the scope and nature of the steps they are taking.

Without effective planning, including a clearly defined program scope, IDDMP is at risk of falling short of expectations and its future funding needs are not adequately justified.

Conclusions

While it is too early to determine how effectively USCIS is managing its long-term A-Files automation effort, USCIS's recent decision to reconsider its long-term IT modernization plans—including the role of IT in the agency's broader organizational and business transformation efforts—was both warranted and appropriate. As USCIS defines and pursues these strategic transformation efforts, it is important that the agency adequately incorporate the keys to successful organizational transformation discussed in this report.

With respect to management of its near-term A-Files automation efforts, key IDDMP planning activities are not being performed effectively. Given the contractual commitments being made on IDDMP, as well as the potential for the cost of this program to reach well into the hundreds of millions of dollars, it is critical that USCIS expeditiously develop an effective program management plan and pilot evaluation plan to guide the execution of the program and the pilot test, respectively. Without these plans, IDDMP is at risk of not meeting expectations and its funding needs are not adequately justified.

Recommendations for Executive Action

To better ensure the success of USCIS's long-term transformation efforts, to include A-Files automation, we recommend that the Secretary of Homeland Security direct the Director of USCIS to implement the following two recommendations:

1. Ensure that the key elements to successful organizational and business transformation cited in this report are employed.

2. Ensure that both a program management plan and a pilot evaluation plan are expeditiously developed and approved for IDDMP, along with a reliable estimate of funding requirements.

Agency Comments

In commenting on a draft of this report, the Department of Homeland Security agreed with our recommendations and described actions that are planned and under way to address them. It also provided technical comments that we have incorporated, as appropriate. The department's comments are reprinted in appendix II.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the report date. At that time, we will send copies to the Secretary of Homeland Security, the Director of the United States Citizenship and Immigration Services, and appropriate congressional committees. We will also make copies available to others on request. In addition, this report will also be available at no charge on GAO's Web site at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-3439 or hiter@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

Randolph C. Hite
Director, Information Technology Architecture
and Systems Issues

Objective, Scope, and Methodology

Our objective was to determine whether the United States Citizenship and Immigration Service (USCIS) is effectively managing its alien files (A-Files) automation efforts. To accomplish this objective, we reviewed and analyzed USCIS's information technology (IT) strategic plan, IT Transformation Program planning documents, and IT Transformation Program mission needs statement, as well as available documentation for the Integrated Digitization Document Management Program (IDDMP). In addition, we reviewed the A-Files budget submission to the Office of Management and Budget, the digitization and storage contractor statements of work, and requirements meeting minutes. Among other things, we interviewed program officials, including the USCIS chief information officer and the IDDMP manager. We also interviewed officials from Immigration and Customs Enforcement and met with officials at the Department of Homeland Security (DHS) Office of Inspector General to discuss program management activities for the IDDMP.

We conducted our work at DHS headquarters offices in Washington, D.C., from August 2005 through February 2006 in accordance with generally accepted government auditing standards.

Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

March 22, 2006

Mr. Randolph C. Hite
Director
Information Technology Architecture
and Systems Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Hite:

Thank you for the opportunity to comment on draft report GAO-06-375, *Information Technology: Near-term Effort to Automate Paper-based Immigration Files Needs Planning Improvements*. Technical comments have been provided under separate cover.

We appreciate the Government Accountability Office's (GAO's) statement that U.S. Citizenship and Immigration Services' (USCIS') recent decision to reexamine prior agency plans for a strategic A-Files automation solution within the context of an agency-wide transformation strategy appropriately recognizes the integral support role that information technology plays in organizational and business transformation. USCIS is committed to transforming the way it does business in support of its operations and customers.

We further appreciate the GAO's review of our near-term A-File automation efforts. The GAO concluded that effective planning has not been occurring. While USCIS is still in the early stages of this effort, we agree that robust planning and management will help ensure success. USCIS established a Digitization Requirements Steering Committee that has gathered high-level technical requirements from key external stakeholders that use the immigration file. USCIS has developed a high-level project approach/time-line that included establishing a team of functional managers that developed requirements, plans-of-action, and a working group charter through facilitated sessions. The managers identified eight components that are key to the success of the Digitization Pilot; Policy and Process, Security and Privacy, Personnel, Organization and Communication, Facility, Training, Technology, and Quality Assurance. USCIS provided GAO a copy of the Digitization Dependency Plan with a high level road map of its process and progress to follow. The plans-of-action for each functional area are now incorporated into the Digitization Integrated Plan. The GAO will be provided a copy of the final Integrated Plan.

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The immediate focus for the plans-of-action is the Pilot Project and the Records Digitization Facility that will be established upon award of the contract. The initial concept was to scan one million I-485 A-Files. After further discussion, however, USCIS expects modifications to the initial approach to reflect: the need to integrate the present digitization efforts with the future envisioned for newer electronic files under the Business Transformation Initiative; the need to determine the feasibility and cost benefits of digitizing a wider range of files with varying degrees of indexing; and, the need to collaborate more effectively with U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection. Accordingly, USCIS is considering a plan to also select a wider range of A-file types and to put them through rigorous testing from beginning to end of the digitized process, including scanning, access, storage, retrieval and further file manipulation. This plan will explore digitization's effectiveness for use by adjudicators and law enforcement personnel. At the same time, USCIS will engage in the larger policy and operational issues discussed above to assess the effectiveness of the approach and new system components, adjusting as indicated by the experiences of this pilot. USCIS anticipates the pilot will provide insight into potential scanning and storage challenges and mitigation strategies for a long-term A-file implementation solution.

In response to the two recommendations, USCIS offers the following:

Direct the Director of USCIS to ensure that the key elements to successful organizational and business transformation cited in this report are employed.

USCIS has been modeling its transformation efforts after best practices and believes the relevant suggestions by the GAO are being covered as follows:

- **Ensure Top Leadership Drives the Transformation.** The USCIS Director and the Acting Deputy Director have immersed themselves in this project to ensure its success. They assembled an Integrated Transformation Leadership Team consisting of officials from all disciplines within USCIS. The Acting Deputy Director and Chief of Staff hold regular team meetings ensuring that both long- and short-term goals are accomplished as well as stressing the importance of the goals' various components. The Manager of the Transformation Program reports directly to the Acting Deputy Director.

- **Establish a Coherent Mission and Integrated Strategic Goals to Guide the Transformation.** The mission of the USCIS Transformation Program is, "USCIS will deliver a new business identity, fresh tools, and dependable information to enable its people as confident and proud stewards of America's promise." In order to accomplish this, USCIS will focus improvements on three areas: national security and integrity, customer service, and administrative economy and efficiency. USCIS will ensure the integrity of the immigration system and the security of the country by effectively collecting, analyzing, and sharing information used to identify eligibility and status. USCIS will deliver world-class customer service by providing timely and accurate information and promoting civic values. USCIS will be an innovative, flexible, and accountable organization

that invests in its people and infrastructure to ensure cost-effective and consistent results.

- **Focus on a Key Set of Principles and Priorities at the Outset Of Transformation.** Transformation established four principal priorities that will help create a new culture and drive employee behavior while allowing USCIS to reach its business goals. These include:

  Ensuring the security and integrity of the system;

  Providing efficient and customer-oriented immigration benefit and immigration services;

  Strengthening the infrastructure necessary to achieve USCIS' mission; and

  Operating as a high-performance organization and position USCIS as an employer of choice.

- **Set Implementation Goals and a Timeline to Build Momentum and Show Progress From Day One.** As currently planned, the USCIS Transformation Program is developing a pilot that will test end-to-end electronic processing of a limited selection of benefits with incremental, phased national rollout once the concept is proven. The program will start in 25 field offices with five users per office, all located in the Western Region. There will be five benefit types tested: international adoptions, applications for certificates of citizenship, replacement of naturalization certificates, locally produced employment authorization documents, and non-immigrant religious workers and cultural representatives. The pilot also has outlined specific milestones and their anticipated completion in line with DHS investment requirements. Interlacing with these milestones will be business and IT metrics. The pilot awaits departmental approval and could be changed.

- **Dedicate an Implementation Team to Manage the Transformation Process.** USCIS has dedicated several teams and management groups in order to ensure and maintain focus on the goals that USCIS has set out to do. The individuals participating in this transformation process come from several different disciplines. At the head of this organization is the Milestone Decision Authority (MDA). The MDA is the senior approval authority and decides when it is appropriate to move onto the next phase of the acquisition life cycle. Working hand in hand with the MDA is the Leadership Team. The Leadership Team is responsible for approving program direction, policy decisions, investment strategy, acquisition strategy, and program scope. The Leadership Team is assembled from USCIS Senior Executive Service Officials whose branches will be the most affected by Transformation.

  A member of the Leadership Team is the USCIS Transformation Program Office (TPO) Program Manager. The Program Manager serves as a liaison between the

Leadership Team and the four other parts of the transformation team. These four remaining team components are Acquisition and Program Support Team, Integrated Design Team, Technology Solutions Team, and Communications and Change Management Team. Each one of these last four teams is highly specialized and focuses on a narrower topic within Transformation.

- **Use the Performance Management System to Define Responsibility and Assure Accountability For Change.** USCIS has identified its current business metrics and laid out new goals and goal metrics. These goal metrics will incorporate a combined effort from every single aspect of USCIS. At the conclusion of the Transformation Program, processes will be standardized and immigration services will have defined measurable parameters. For example, one of USCIS' goals is operational efficiency. At this time the number of applications that are initially processed correctly varies. Once transformation is concluded, less than 10 per cent of applications submitted will require a second review.

- **Establish a Communication Strategy to Create Shared Expectations and Report Related Progress.** The Communications and Change Management Team will be responsible for developing and executing the communications strategy plan; conceptualizing, organizing, and rolling out content for Intranet sites and other communication mechanisms; coordinating, tracking, and updating communications; and planning, coordinating, and guiding content development for key communications events with stakeholders and the end-user community.

- **Involve Employees to Obtain Their Ideas and Gain Their Ownership For Transformation.** Transformation will take a proactive approach to strategizing and planning this area. There will be ongoing, targeted site visits to establish Training and Change Management needs. This will allow feedback to occur and appropriate measures in response to this feedback to take place. Employees will have the opportunity to be heard and impact the way the program will be shaped.

- **Build a World-Class Organization.** USCIS wants to change for the better, and also become "best-in-class" in the government arena. USCIS believes this will be possible through Transformation. It plans on doing this by examining other benchmark best practices, as well as constantly striving to improve in its core competencies.

Direct the Director of USCIS to ensure that both a program management plan and pilot evaluation plan are expeditiously developed and approved for Integrated Digitization Document Management Program (IDDMP), along with a reliable estimate of funding requirements.

USCIS is in the process of establishing a Project Management Office to manage the Digitization effort. This office will manage progress against the existing program management plan and develop a pilot evaluation plan, as well as reliable funding estimates, as the program moves forward in development. It will also address the likely

modifications to the initial approach to reflect: the evolution of USCIS' Business Transformation Initiative; the need to integrate the present digitization efforts with the future envisioned for newer electronic files under the Business Transformation Initiative; and, the need to determine the feasibility and cost benefits of digitizing certain files. At the same time, USCIS will analyze the larger policy and operational issues discussed above to assess the effectiveness of the approach and new system components, adjusting as indicated by the experiences of this pilot.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on future homeland security issues.

Sincerely,

Steven J. Pecinovsky
Director
Departmental GAO/OIG Liaison Office

GAO Contact and Staff Acknowledgments

GAO Contact

Randolph C. Hite, (202) 512-3439 or hiter@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff made key contributions to this report: Michael Marshlick, Assistant Director; Elena Epps; Kate Feild; and Nancy Glover.

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