

devoted to the pilots to successfully implement them. Consequently, the results of the DORA expansion may not demonstrate the advantages of up-front processing.

When an up-front processing model is introduced at an office, there is a short-term need for additional staffing to enable the program to be implemented simultaneously with existing caseloads. Field offices often have interviews scheduled up to six months in advance. Until that workload is cleared, there may be a need for more adjudicators to conduct the additional interviews, and appropriate resources must be provided. The announcement in February 2007 of the proposed fee increases resulted in a surge in applications. As a result, implementation of the DORA program at the El Paso and Oklahoma City offices was even more challenging, especially since the offices received no additional short-term resources to begin the process. Additionally, in Oklahoma City, current lack of a field office director leaves the office without the leadership necessary to implement and test the up-front processing model.

In its 2006 Annual Report Response (at p. 23), USCIS stated that both the 90-day process and DORA have “advantages” and that the agency “will conduct a full analysis of both methods to decide which to adopt nationally.” A full and fair comparison of DORA and the 90-day program requires testing that includes controlling for the variables mentioned. The Ombudsman looks forward to receiving the results of that analysis.

*RECOMMENDATION AR 2007 -- 24*

*The Ombudsman recommends that USCIS end the now three-year old DORA pilot. USCIS should evaluate the different up-front processing programs to determine the comparative value of each program and whether they should be expanded. The USCIS findings and empirical data should be made available to the public. The agency should either implement a version of DORA nationwide or another program which will achieve the same objectives with equal or better results.*

## V. RECOMMENDATIONS

This section includes summaries of the Ombudsman’s formal recommendations for the 2007 reporting period, as well as those prior recommendations to which the Ombudsman received new USCIS responses during the period.<sup>79</sup> The recommendations stem from a variety of sources, including problems reported to the Ombudsman by individuals and employers, discussions with immigration stakeholders, and suggestions of USCIS employees themselves. For the full text of the recommendations and USCIS responses, please refer to the Ombudsman’s website at [www.dhs.gov/cisombudsman](http://www.dhs.gov/cisombudsman).

<sup>79</sup> The Homeland Security Act of 2002, 6 U.S.C. § 272(c)(1), states that the Ombudsman’s annual report shall include an inventory of the recommendations and indicate: (1) if action has been taken and the result of that action; (2) whether action remains to be completed; and (3) the period during which the item has been on this list.