

The following USCIS response was received as part of a collective response to several recommendations submitted by the CIS Ombudsman. The following response has been extracted from the original document received by the CIS Ombudsman for display and readability purposes.

Recommend that USCIS cease operation of the Chicago lockbox upon the expiration of its current Memorandum of Understanding (September 30, 2005) with the U.S. Department of Treasury due to:

- A. Inefficient shipment of files between USCIS offices, resulting in tracking and management challenges;**
- B. Inefficient processing within the Chicago Lockbox, resulting in delays in issuing receipts to immigration customers; and**
- C. Insufficient guidance and oversight within the Chicago Lockbox which have resulted in valid filings being incorrectly rejected and returned to immigration customers.**

The relationship between USCIS and the Department of Treasury (Treasury) has been in development for many years due to recommendations made in various General Accounting Reports, audits, and Office of Inspector General reports over the past fifteen years of legacy Immigration and Naturalization Service and USCIS as a major detriment to good, sound financial performance. USCIS' core business is adjudicating immigration applications and conferring benefits on those who are eligible, not managing receipts associated with those benefits. Unfortunately, there have been employees over the years who have not taken their fiduciary responsibilities with the degree of seriousness that it merits and in other cases, adequate checks and balances as well as adequate equipment was not in place to secure these resources. One of the solutions to managing the receipts was to entrust it to Treasury officials who manage resources for much of the rest of the federal government.

The USCIS has developed a business strategy over a number of years that insures consistency in filing, fee receipting, processing, and adjudicating. Part of this business strategy includes turning over the fee receipting to another government entity whose core business is processing of fees so that the USCIS could focus on its core business areas of adjudication benefit applications. This business system supports our vision of the future where electronic adjudications and the elimination of time wasted handling paper files will be our reality.

The Ombudsman has identified many problems in this recommendation that have been a challenge to the start-up of the lockbox operation. It is true that setting up the case resolution unit took longer and delayed receipting and file movement longer than expected. Also, this problem and some others delayed the movement of files from one location to another due to case resolution issues at the lockbox. Unfortunately, these problems occurring at the beginning of adjudicative processes have had a downstream rippling effect on subsequent operational steps. However, it is our sense that we have overcome these challenges, put in processes and procedures to mitigate or eliminate such problems in the future, and address the impact of the problems that these initial problems created.

Although the Ombudsman has argued for a different approach to adjudications, this

USCIS Response to Ombudsman
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recommendation would be a step backward in modernizing our adjudication processing and does not seem to fulfill the spirit of advancing best practices for which the USCIS is committed. The USCIS is committed to making this process efficient and effective so that the resources we have can be dedicated to our core business areas.