

February 2005

# BORDER SECURITY

## Streamlined Visas Mantis Program Has Lowered Burden on Foreign Science Students and Scholars, but Further Refinements Needed



G A O

Accountability \* Integrity \* Reliability



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**Abbreviations**

CCD	Consular Consolidated Database
CLASS	Consular Lookout and Support System
DHS	Department of Homeland Security
FBI	Federal Bureau of Investigation
INA	Immigration and Nationality Act
NP	Bureau of Nonproliferation
SAO	Security Advisory Opinion
SAO IP	Security Advisory Opinion Improvement Project
SEVIS	Student and Exchange Visitor Information System
TAL	Technology Alert List

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

February 18, 2005

The Honorable Sherwood Boehlert  
Chairman  
The Honorable Bart Gordon  
Ranking Minority Member  
Committee on Science  
House of Representatives

The Honorable Curt Weldon  
House of Representatives

Each year thousands of international science students and scholars apply for visas<sup>1</sup> to enter the United States to participate in education and exchange programs. Foreign science students and scholars offer our country diversity and intellectual knowledge and are also an economic resource. At the same time, the United States has important national security interests in carefully screening science students and scholars who apply for visas. A primary tool that the U.S. government uses to conduct this screening is the Visas Mantis program, a security review procedure involving multiple U.S. government agencies, which aims to identify those visa applicants who may pose a threat to our national security by illegally transferring sensitive technology. Visa applicants from China account for more than half of all Visas Mantis security reviews.

In February 2004, we reported<sup>2</sup> and testified<sup>3</sup> that there were delays in the Visas Mantis program and interoperability problems between the State Department (State) and the Federal Bureau of Investigation (FBI) that contributed to these delays and allowed cases to get lost. We determined that in the spring of 2003, it took an average of 67 days for Visas Mantis checks to be processed and for State to notify consular posts of the results. Further, we reported that visa officers at posts lacked clear guidance and

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<sup>1</sup>A visa is a travel document that allows a foreign visitor to present himself or herself at a port of entry for admission to the United States. In this report, we use the term “visa” to refer to nonimmigrant visas only. The United States also grants visas to people who are intending immigrants.

<sup>2</sup>GAO, *Border Security: Improvements Needed to Reduce Time Taken to Adjudicate Visas for Science Students and Scholars*, [GAO-04-371](#) (Washington, D.C.: Feb. 25, 2004).

<sup>3</sup>GAO, *Border Security: Improvements Needed to Reduce Time Taken to Adjudicate Visas for Science Students and Scholars*, [GAO-04-443T](#) (Washington, D.C.: Feb. 25, 2004).

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sufficient feedback regarding when to apply the Visas Mantis program and the amount of information to include in Mantis requests sent to headquarters. We recommended that the Secretary of State, in coordination with the Secretary of Homeland Security and the Director of the FBI, develop and implement a plan to improve the Visas Mantis process. Specifically, we recommended that, in developing this plan, the Secretary should consider several actions, including establishing milestones; providing additional guidance to consular posts on the Mantis program; and working to achieve interoperable systems and expedite transmittal of data between agencies.

At your request, we (1) determined the length of time taken to process a Mantis check;<sup>4</sup> and (2) assessed actions taken to implement our recommendation to improve the Mantis program and to address other issues that may affect science students' and scholars' efforts to obtain visas. To determine the length of time it takes to process a Mantis check, we obtained and analyzed data from the State Department's electronic tracking system for Mantis cases. To fulfill our second objective, we analyzed policies and procedures put in place to improve the Visas Mantis program and interviewed key State, Department of Homeland Security (DHS), and FBI officials. We also observed visa operations and interviewed officials responsible for maintaining Visas Mantis data at three consular posts in China and the U.S. embassies in Russia and Ukraine. We chose these five posts because they account for almost 71 percent of all Mantis requests. Appendix I provides more information on our scope and methodology. We conducted our evaluation in accordance with generally accepted government auditing standards.

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## Results In Brief

State Department data show that the average time to process Mantis checks and notify posts is significantly lower than the average we previously reported for the period April-June 2003.<sup>5</sup> In November 2004, the average Mantis processing time was about 15 days. Consular officials at posts we visited confirmed that they were receiving faster responses from

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<sup>4</sup>In this report, we are defining the Mantis process as the time from when a post submits a Mantis cable to the State Department to the time when State responds to the post on the case.

<sup>5</sup>The average of 67 days was based on a random selection of Mantis cases submitted to State between April and June 2003.

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Washington and also reported that the number of Mantis cases pending in Washington for more than 60 days had declined dramatically.

The Department of State and other government agencies took several steps in response to our February 2004 report to reduce Mantis processing times and address other issues that science students and scholars face in traveling to the United States. In response to our recommendation, State developed a Visas Mantis action plan, which was submitted to DHS on May 26, 2004. Although this plan remained in draft and was never fully implemented, State, DHS, and other agencies acted on many of the steps called for in the plan and took other measures to improve the Visas Mantis program. These actions included adding staff to process Mantis cases; providing additional guidance and feedback to consular posts; developing an electronic tracking system for Mantis cases; clarifying the roles and responsibilities of agencies involved in the Mantis process; reiterating State's policy of giving students and scholars priority scheduling for interview appointments; and extending the validity of Visas Mantis clearances. These initiatives contributed to a decline in Mantis processing times. However, some issues remain unresolved. Consular officers at key posts continue to have questions about how to apply the Mantis program and identify visa applicants who should receive Mantis checks. Our work suggests that these officers learn best through direct interaction with State officials knowledgeable about the program. However, State has not developed a program for consular officers at these posts that provides opportunities for routine direct interaction with agency officials, through such activities as videoteleconferences and one-on-one meetings. We also found that many agencies that receive Mantis cases are not fully connected to State's electronic tracking system. As a result, consular officers must send Mantis cases both electronically and by cable, and some agencies provide their responses to State via courier. This system can lead to unnecessary delays in the process. Finally, State Department officials made a proposal to the Chinese government to extend visa validities for students, on a reciprocal basis. This proposal, if implemented, could lower consular workload and facilitate travel by science students and scholars. However, the Chinese government has not agreed to the proposal.

To further refine the Mantis program, we recommend that the Secretary of State, in coordination with the Secretary of the Department of Homeland Security,

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- develop a formal timeframe for fully connecting all necessary U.S. agencies and bureaus to the computer system used to track and process Mantis cases; and
  - provide additional opportunities for consular officers at key posts to interact directly with State officials responsible for the Visas Mantis program. These opportunities could include more frequent videoteleconferences, mandatory one-on-one meetings with State officials knowledgeable about the program, and more visits by State officials to consular conferences.

We provided a draft of this report to State, DHS, and DOJ. In commenting on our report, State and DHS stated that they were taking actions to implement our recommendations. DOJ commented on a recommendation included in the draft, but which we chose not to include in the final report.

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## Background

Foreign science students and scholars generally begin the visa process by scheduling a visa interview. On the day of the appointment, a consular officer reviews the application, checks the applicant's name in the Consular Lookout and Support System (CLASS),<sup>6</sup> takes the applicant's digital fingerprints and photograph, and interviews the applicant. Based on the interview and a review of pertinent documents, the consular officer determines if the applicant is eligible for nonimmigrant status under the 1952 Immigration and Nationality Act (INA).<sup>7</sup> If the consular officer determines that the applicant is eligible to receive a visa, the applicant is notified right away and he or she usually receives the visa within 24 hours.

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<sup>6</sup>CLASS is a State Department name check database that posts use to access critical information for visa adjudication. The system contains records provided by numerous agencies and includes information on persons with visa refusals, immigration violations, and terrorism concerns.

<sup>7</sup>The term nonimmigrant generally refers to a foreign national seeking to enter the United States temporarily for one of the specific purposes allowed under the INA. The most common reason for denial of a visa is that the consular officer has determined that the applicant intends to come to the United States and remain. Section 214(b) of the INA presumes that every alien is an immigrant until he establishes that he is eligible for nonimmigrant status under the INA. Often this means establishing, in addition to other criteria, that the alien has sufficient social or economic ties to compel him to return home after visiting the United States. See 8 U.S.C. §1184(b) and 8 U.S.C. §1101(a)(15).



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In some cases, the consular officer decides that the applicant will need a Security Advisory Opinion (SAO), a response from Washington on whether to issue a visa to the applicant.<sup>8</sup> SAOs are required for a number of reasons, including concerns that a visa applicant may engage in illegal transfer of sensitive technology.<sup>9</sup> An SAO based on sensitive technology transfer concerns is known as Visas Mantis and, according to State officials, is the most common type of SAO applied to science applicants. It is also the most common type of SAO sent from the posts we visited in China, as well as in Kiev, Ukraine.<sup>10</sup>

The Visas Mantis process is designed to further four important national security objectives:

- prevent the proliferation of weapons of mass destruction and their missile delivery systems;
- restrain the development of destabilizing conventional military capabilities in certain regions of the world;
- prevent the transfer of arms and sensitive dual-use items to terrorists and states that sponsor terrorism; and
- maintain U.S. advantages in certain militarily critical technologies.

The Visas Mantis process has several steps and involves multiple U.S. agencies (see fig. 1). In deciding if a Visas Mantis check is needed, the consular officer determines whether the applicant's background or proposed activity in the United States could involve exposure to technologies on the Technology Alert List (TAL). The list, published by the State Department in coordination with the interagency community and based on U.S. export control laws, includes science and technology-related fields where, if knowledge gained from research or work in these fields

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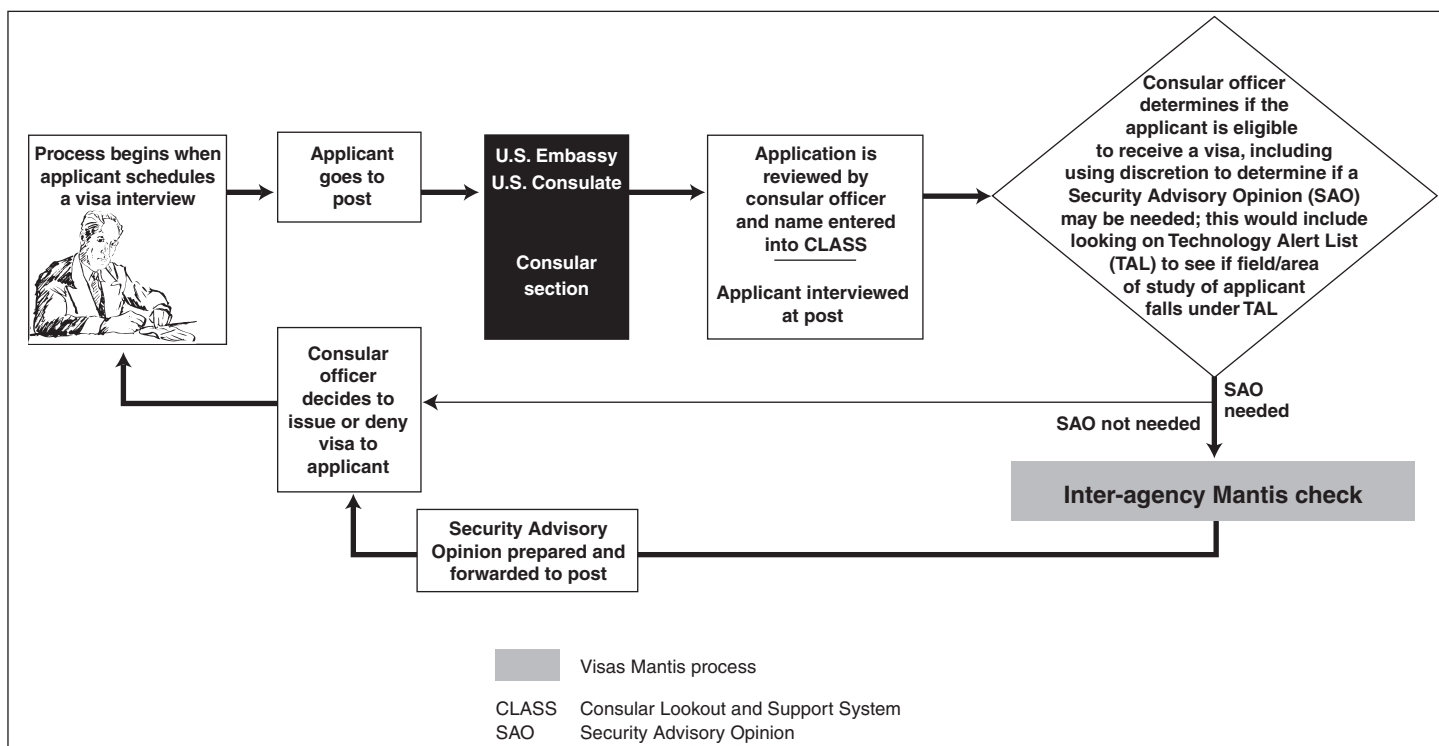
<sup>8</sup>According to State officials, between 2-3 percent of all nonimmigrant visa applications require an SAO.

<sup>9</sup>Under Section 212(a)(3)(A) of the INA, an applicant is rendered inadmissible if there is reason to believe that the applicant is seeking to enter the United States to violate United States laws prohibiting the export of goods, technology, or sensitive information from the United States. 8 U.S.C. § 1182(a)(3)(A)(i)(II).

<sup>10</sup>In Moscow, the most common SAO requested is Visas Bear, which is a check on many official visitors. Visas Mantis is the next most common SAO requested from Moscow.

were used against the United States, it could potentially be harmful. If a Visas Mantis is needed, the consular officer generally informs the applicant that his or her visa is being temporarily refused under Section 221(g) of the INA, pending further administrative processing.<sup>11</sup>

**Figure 1: Visa Adjudication Process**



Source: GAO analysis of State Department documents and visa operations.

After a consular officer decides that a Visas Mantis is necessary for an applicant, several steps are taken to complete the process. The officer or a Foreign Service National drafts a Visas Mantis SAO request, which contains information from the applicant’s application package and interview. The case is then generally reviewed and approved by a consular section chief or other consular official at post before it is transmitted both electronically

<sup>11</sup>According to the State Department’s consular training guide, generally 221(g) is applied when an applicant lacks required documents, or some visa processing is incomplete.

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and through State's traditional cabling system. Once the request is sent, the State Department's Bureau of Nonproliferation and other agencies review the information in the cable and respond within 10 working days to State's Bureau of Consular Affairs. Several agencies, such as the Departments of Commerce and Energy, receive Mantis cases but do not routinely respond to Consular Affairs.

State's Bureau of Consular Affairs receives all responses pertaining to an applicant, summarizes them, and prepares a security advisory opinion. This SAO is then transmitted to the post electronically indicating that State does or does not have an objection to issuing the visa, or that more information is needed.<sup>12</sup> A consular official at post reviews the SAO and, based on the information from Washington, decides whether to deny or issue the visa to the applicant. The officer then notifies the applicant that the visa has been denied or issued, or that more information is needed.

Last year, consular officers submitted roughly 20,000 Mantis cases. According to consular officials, the visa is approved in the vast majority of cases. Data provided show that less than 2 percent of all Mantis requests result in visa denial. However, even when the visa is issued, the information provided by the consular posts on certain visa applicants is useful to various U.S. government agencies in guarding against illegal technology transfer. According to State, the Visas Mantis program provides State and other interested agencies with an effective mechanism to screen out those individuals who seek to evade or violate laws governing the export of goods, technology, or sensitive information. This screening, in turn, addresses significant issues of national security.

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## Mantis Processing Times Have Declined

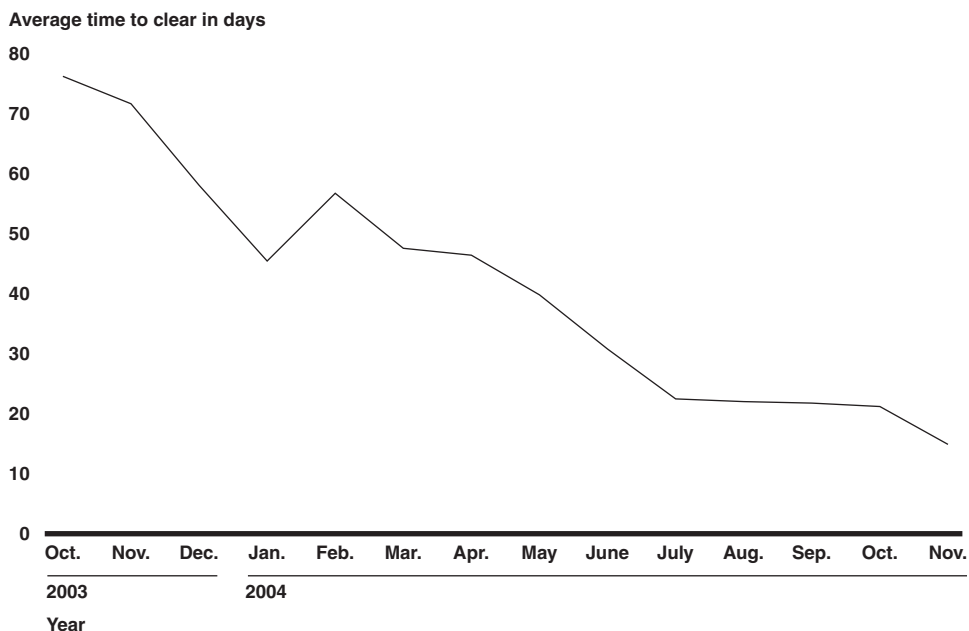
Mantis processing times and the number of cases pending more than 60 days have declined significantly. In February 2004, we reported that the average length of time it took to process Mantis checks in Washington and for State to notify posts was 67 days for Mantis cases initiated from April—June 2003. State reported that the average Mantis processing time in October 2003 was 75 days. However, by November 2004, the processing and notification time for Mantis cases submitted was only about 15 days. Figure

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<sup>12</sup>A message requesting more information is sent to post when State or other agencies involved in the Visas Mantis process require additional information, such as an itinerary, on a visa applicant.

2 demonstrates how the average Mantis processing time for cases submitted by all consular posts has declined since October 2003.

**Figure 2: Average Time to Close Mantis Cases by Month**

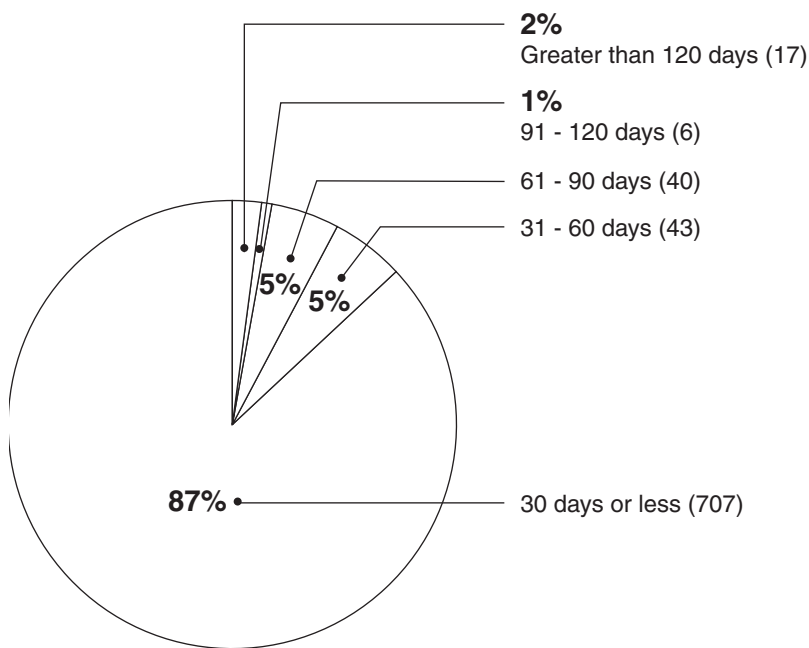


Source: State Department, Bureau of Consular Affairs.

Note: This graph does not include data on cases that were still pending as of November 2004.

State Department data also show significant improvement in the number of Mantis cases pending more than 60 days. In February 2004, we reported that 410 Visas Mantis cases submitted by seven posts in China, India, and Russia had been pending more than 60 days. However, recent data provided by the State Department show that, as of October 2004, only 63 cases (or 9 percent of all pending Mantis cases) had been pending for more than 2 months. Figure 3 shows a breakdown of all pending Mantis cases, sorted by the length of time they have been pending.

**Figure 3: Pending Mantis Cases as of November 30, 2004**



Source: State Department, Bureau of Consular Affairs.

Consular officials at the posts we visited confirmed that they were receiving faster responses from Washington and that the number of Mantis cases pending more than 60 days had declined.

## **Actions Taken to Improve the Mantis Process, but Some Issues Are Unresolved**

In response to our February 2004 report, State, DHS, and the FBI took several steps to achieve this reduction in Mantis processing times. State submitted a Visas Mantis action plan to DHS in May 2004. Although this plan remained a draft and was not fully implemented, State and other agencies acted on many of the steps called for in the plan and undertook other efforts to address difficulties that students and scholars face in obtaining visas. These actions included establishing a stand-alone Mantis team; providing additional guidance to consular officers; creating an electronic tracking system for Mantis cases; clarifying the roles and responsibilities of agencies involved in the Mantis process; reiterating a policy to give students and scholars priority interviews; and extending the validity period for Mantis clearances. These actions contributed to a decline in overall Mantis processing times.

Despite these improvements, some issues remain that, if resolved, could further refine the Mantis process. Consular officers in key Mantis posts continue to have questions about how to implement the Mantis program. Several agencies that participate in the Mantis process are not fully connected electronically to State’s tracking system. In addition, the U.S. visa reciprocity schedule with China (which accounts for more than half of all Mantis cases) limits students and scholars to 6-month, two-entry visas. In order to facilitate travel, State Department officials proposed to extend visa validities for students and scholars on a reciprocal basis. However, the Chinese government did not agree to do so. Table 1 outlines the actions taken to improve Visas Mantis and the outstanding issues that need to be addressed.

**Table 1: Actions Taken to Improve Visas Mantis and Address Other Obstacles Faced by Students and Scholars in Obtaining Visas**

Action Taken	Unresolved Issues
1. State added staff dedicated to processing Mantis cases and created procedures for expediting cases.	None.
2. State provided additional guidance and feedback to consular officers.	Consular officers need more direct interaction with State officials to understand the Mantis program.
3. State implemented a Mantis electronic tracking system.	U.S. Government agencies that receive Mantis cases are not yet fully connected electronically to the system.
4. FBI agreed that, while it would continue to receive Mantis cases, it would not routinely clear them.	None.
5. Agencies agreed to clear Mantis cases in 10 working days.	None.
6. State reiterated its policy of giving priority scheduling to students and scholars.	None.
7. State extended the validity of Mantis clearances.	None.
8. U.S. government proposed to extend visa validities for business travelers, tourists, and students and scholars in China, based on reciprocal treatment by China.	Visa validities were extended on a reciprocal basis for business travelers and tourists from China, but the Chinese government did not agree to extend visa validities for students and scholars.

Source: GAO.

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## State Added Staff and Created Processes for Expediting Cases

On February 25, 2004, the Assistant Secretary of State for Visa Services testified before the House Science Committee that the agency had taken steps to increase efficiency in the Visas Mantis process. These steps included creating a stand-alone Mantis team composed of five full-time employees dedicated to processing only Mantis cases. A key State official told us that he believed this action contributed significantly to the decline in Mantis processing times. The Assistant Secretary of State also testified that the agency had established procedures for expediting individual Mantis cases, when appropriate. These procedures involved faxing requests for expedition to the appropriate clearing agencies. Again, a key State official told us that closer cooperation with other agencies had led to faster Mantis processing times.

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## State Provided Additional Guidance and Feedback

In February 2004, we reported that consular staff at posts we visited said they were unsure whether they were contributing to lengthy waits because they lacked clear guidance on when to apply Visas Mantis checks and did not receive feedback on whether they were providing enough information in their Visas Mantis requests. As a result, State undertook a number of initiatives to provide guidance and feedback to the consular officers responsible for adjudicating cases that require Mantis checks. In 2004, the State Department:

- Added a special presentation on Visas Mantis to the nonimmigrant visa portion of the Basic Consular Training course.
- Funded a trip by Nonproliferation (NP) and Consular Affairs (CA) officials to a regional consular conference in China to make presentations and hold discussions with consular officers on specific Mantis issues.
- Organized a series of videoteleconferences with posts that submit large numbers of Visas Mantis SAO requests to provide direct feedback to embassy and consular officers on the quality of their Visas Mantis requests.
- Began issuing quarterly reports to the field about Visas Mantis policy and procedural issues to “help consular officers understand the Visa Mantis program better, provide guidance on what cases should be submitted as Visas Mantis SAO requests and what information should be included in requests, and to give feedback on the quality of those

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requests.” The first quarterly report was issued in March 2004, followed by two more in July and October.

- Arranged one-on-one meetings with the CA and NP offices for new junior officers assigned to posts with high Mantis volumes.
- Provided feedback to individual consular officers on the Mantis SAOs they have submitted. This initiative is designed both to recognize consular officers who are submitting well-documented requests that correctly target applicants of concern and to guide officers on what kind of information should be included in requests, depending on the type of visit the applicant plans to make. The direct feedback program also allows State to guide officers as to whether they are submitting SAO requests on the correct applicants.
- Established a classified webpage through the State Department’s intranet for consular officers to gain access to country-specific and other useful information related to the Mantis program. For example, it identifies websites that officials in NP use when determining how to respond to a Mantis case.

Officers at the posts we visited stated that some of these steps were extremely useful, especially those initiatives that allowed for direct interaction with officials from Consular Affairs and Nonproliferation. For example, a junior officer in Guangzhou who had attended the new Mantis presentation in consular training and had held a one-on-one meeting with Consular Affairs stated that these initiatives were useful for understanding how the SAO process works and why it is necessary. Another junior officer in Shanghai stated that a videoteleconference his post held with NP was invaluable for addressing his questions about the Visas Mantis program. Consular officials in China who met with representatives from NP and CA at the consular conference in February 2004 said that they found the opportunity helpful in addressing some of their Mantis-related questions.

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## State Implemented an Electronic Tracking System

State developed and implemented an electronic system to track Mantis cases. Beginning in early 2003, State invested about \$1 million to upgrade its Consular Consolidated Database to allow for electronic processing and tracking of all SAOs, including Visas Mantis requests, and to eliminate use of its traditional cabling system. This upgrade, called the “SAO Improvement Project” (SAO IP), resulted in a computer-based system that allows posts to send Mantis requests electronically. Previously, consular



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officers relied solely on the cabling system to transmit Mantis cases to Consular Affairs. As we found in our February 2004 report, this system resulted in Mantis cases getting lost due to cable formatting errors and duplicate cases being rejected by the FBI database. By attaching a unique identifier to each Mantis case, the SAO IP ensures that cases can be easily tracked. As an added measure, a block is built into the system that prevents consular officers from resubmitting Mantis requests on the same visa application.

The SAO IP allows the State Department to more easily produce and track important statistics. For example, it enables State to follow average Mantis processing times, the number of Mantis cases submitted by each post, and the amount of time each step in the Mantis process is taking.

Officials at posts we visited told us that they like being able to track individual cases as they go through the interagency process in Washington. In both Moscow and Kiev, for example, the SAO IP institutionalizes and expands upon tracking efforts that posts had begun on their own. Officials in Beijing told us that when they receive a public inquiry on a pending Mantis case, they can use the tracking system to determine the status of the case.

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## FBI No Longer Routinely Clears Mantis Cases

In July 2004, the FBI, State, and DHS reached an agreement that fundamentally changed the FBI's role in the Visas Mantis process. Officials from these agencies had determined that the FBI could fulfill its law enforcement role in the Mantis process without routinely clearing Mantis cases. Under the new "no objections policy," the State Department does not have to wait for an FBI response before processing Mantis cases, but the FBI continues to receive information on visa applicants subject to Mantis checks.

Prior to this change, State's policy was to wait for a response from the FBI before proceeding with each Visas Mantis case. If the FBI requested that State "put a hold" on an individual Mantis case, State could not provide a response to post on the case until the hold was removed. This policy resulted in a backlog of almost 1,000 cases and contributed to lengthy wait times for visa applicants. As we reported in February 2004, it took the FBI an average of about 29 days to complete clearances on Mantis cases. In fact, FBI clearance often took longer than any other step in the Mantis process. Once cases had been cleared by the FBI, it could take another 6

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days before State was informed. Some of the Mantis cases in the random sample we reviewed took more than 100 days to be processed at the FBI.

The FBI's new role allows State to process Mantis cases more easily. As the Bureau of Consular Affairs reported to consular posts in October 2004, "the change in the FBI's role has made it easier for us to respond to most Mantis SAO requests more expeditiously." The new agreement also allowed State to clear about 1,000 Mantis cases that the FBI had maintained on hold, many of them for a "very long time," according to State officials. Consular officers we spoke to in China, Russia, and Ukraine confirmed that they were beginning to receive clearances on Mantis cases that had been pending for long periods of time.

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### Agencies Agreed to Clear Mantis Cases in 10 Working Days

In November 2004, the remaining agencies responsible for clearing Mantis cases agreed to respond to the Bureau of Consular Affairs within 10 working days. Before this agreement, the agencies had 15 working days to respond to State. As a result, the total Mantis processing time could not be lower than about 20 calendar days (to account for weekends). According to Consular Affairs, under the new rule, State should be able to achieve total Mantis processing times of about 15 to 17 calendar days.

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### State Reiterated Its Policy of Giving Students and Scholars Priority

In July 2004, the Secretary of State reminded posts via cable that they should give priority scheduling to persons applying for F, J, and M<sup>13</sup> visas. As explained in the cable, students and exchange visitors are often subject to deadlines, so posts must have well-publicized and transparent procedures in place for obtaining priority appointments for them. Data show that this policy is critical for ensuring that students and scholars obtain their visas in time to meet their deadlines. For example, between January and September 2004, non-student, nonimmigrant visa applicants applying in Shanghai could expect to wait between 1 and 2 months to obtain an interview.<sup>14</sup> Data provided by the State Department also point to long interview wait times for non-student or scholar visa applicants at other posts. As of October 7, 2004 (when visa demand has usually declined

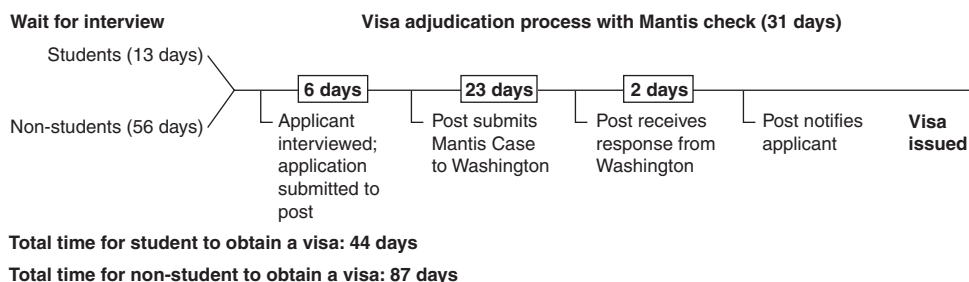
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<sup>13</sup>F-1 visas are for students; J-1 visas are for exchange visitors; and M-1 visas are for vocational students or other nonacademic students.

<sup>14</sup>The shortest wait time for an interview was 31 calendar days, while the longest wait time was 56 calendar days.

from summer levels), the nonimmigrant visa interview wait time was 32 days in Beijing, 49 days in Guangzhou, and 34 days in Kiev. Post-specific data show that interview wait times for students are much shorter. For example, on June 15, 2004 (when visa demand is typically high), students and scholars in Shanghai could get an interview within 13 days, while other nonimmigrant visa applicants had to wait 56 days. Figure 4 illustrates that, in June 2004, a peak visa application period, non-student visa applicants could wait as long as 87 days to receive visas, while student applicants could receive visas in as few as 44 days.

**Figure 4: Comparison of Mantis Processing Timelines for Non-Student Nonimmigrant Visa Applicants and Student Nonimmigrant Visa Applicants in Shanghai, China, June 2004**



Source: GAO analysis of State Department data and data provided by the U.S. Consular, Shanghai.

## State, DHS, and the FBI Agreed to Extend the Validity of Visas Mantis Clearances

On February 11, 2005, State issued a cable to consular posts establishing new maximum validities for Mantis clearances, thereby allowing students and others to reapply for visas without undergoing frequent Mantis checks. Previously, Mantis clearances were valid for 1 year. Under that rule, if an applicant reapplied for a visa more than 1 year after the processing of the original Mantis check, he or she would have to undergo another Mantis check before receiving the new visa. Organizations representing the international scientific community argued that this validity period was too short. For example, foreign students attending 4-year college programs had to renew their Mantis clearances each year.

Under the new validity periods, students can receive Mantis clearances valid for the length of the approved academic program up to 4 years, and temporary workers, exchange visitors, and intracompany transferees can receive clearances for the duration of an approved activity for up to 2

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years.<sup>15</sup> State estimates that this change will allow the agency to cut in half the total number of Mantis cases processed each year.

The new validity periods are the result of negotiations between State, DHS, and the FBI. Although State and DHS proposed extending Mantis clearances in the summer of 2004, the FBI argued that an extension in Mantis clearances would significantly reduce its capability to track and investigate individuals subject to the Visas Mantis program. The FBI informed us that without the same frequency of automatic Mantis notifications, it would have far less knowledge of when these individuals enter the country, where they go, and what they are supposed to do while here. As a result, the FBI made its agreement to State's and DHS's proposal conditional on receiving access to the US-VISIT system and the Student and Exchange Visitor Information System (SEVIS). US-VISIT is housed in DHS and is a governmentwide program for collecting, maintaining, and sharing information on certain foreign nationals who enter and exit the United States. SEVIS is a system that maintains information on international students and exchange visitors and their dependents in the United States. In February 2005, the FBI and DHS reached agreement on the terms of the FBI's access to these two systems, allowing the proposed extension of Mantis clearances to take effect.

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## Consular Officers at Key Posts Still Need Additional Guidance

China and Russia account for roughly 76 percent of all Mantis cases. However, we found that some consular officers at these posts remain confused about how to apply the Mantis program. For example, Beijing consular officers, some of them new to the post, consistently told us that they needed more clarity and guidance regarding how to use the Technology Alert List (TAL). According to a key consular official in Beijing, because these officers generally do not have scientific or technical backgrounds, they often do not understand what entries on the TAL mean or whether the visa applicant has advanced knowledge about the subject he or she plans to study in the United States. They are also confused about how to apply vague, seemingly benign categories. For example, officers in Beijing did not know whether to continue submitting Mantis requests for all individuals that fall under the category of "Communications – wireless

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<sup>15</sup>The new clearance validity periods do not apply to applicants from state sponsors of terrorism. In addition, business visitors and visitors for pleasure would continue to receive Mantis clearances valid for 1 year, provided that the purpose of the visit to the United States has not changed.

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systems, advanced,” even if the visa applicant works for a foreign multinational corporation that is not a Chinese government-owned telecom enterprise. Few of the consular officers we spoke with in China, Russia, or Ukraine were familiar with the quarterly reports issued by Consular Affairs on Mantis issues. The only officer aware of the classified webpage maintained by the Consular Affairs Bureau told us that he did not find it useful because it had very little information on it and because it was hard for him to access the classified computer system, which is housed in a separate building far from the consular section.

We found that consular officers at the consular posts we visited did not have regular opportunities to interact directly with officials from the Nonproliferation Bureau or the Consular Affairs Bureau knowledgeable about the Mantis program. For example, representatives from State’s Nonproliferation Bureau and Consular Affairs Bureau have visited just one consular conference—the February 2004 conference in China. Although new consular officers are given the option to meet with NP and CA officials before traveling to post, State does not require these one-on-one meetings for officers assigned to key Mantis posts. Although China accounts for more than half of Mantis requests submitted, only one of the country’s six consular posts has held a videoteleconference. Kiev requested a videoteleconference in early 2004, but had been unable to schedule one, as of December. Finally, in Beijing, only one of the officers who had attended the consular conference in February was still at post.

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### Agencies Are Not Connected to State’s Electronic Tracking System

Several law enforcement, intelligence and non-intelligence agencies that receive Mantis cases, including the Departments of Commerce and Treasury, are not fully connected to State’s electronic tracking system. This system, in addition to allowing State to track individual cases, was designed to eliminate the use of cables for the transmission of SAO cases because, according to State, they were “the source of garbled information and other errors that resulted in lost or delayed cases that required human intervention.” For example, as we found in our February 2004 report, 700 Mantis cables that were sent from Beijing in fall 2003 did not reach the FBI. It took Consular Affairs about a month to identify that there was a problem and to provide the FBI with the cases.

However, since several of the agencies that receive Mantis cases are not yet fully connected electronically to the system they continue to receive Mantis cases through State’s traditional cabling system. For the time being, consular officers send Mantis cases both electronically and by cable. Those

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agencies that are responsible for routinely clearing Mantis cases provide responses to State on compact discs that must be hand-carried between the agencies. As we found previously, this use of cables and couriers can lead to unnecessary delays in the process.

State officials informed us that they are working to establish full connectivity with other agencies. However, State's goals for fully connecting certain agencies to the system have not been met. Further, State has not set milestones for connecting the remaining agencies to the system. In July 2004, State's Assistant Secretary for Congressional Relations wrote in a letter to the House Science Committee and other House and Senate committees that he expected the FBI to begin relying on the network on a regular basis by the end of that month. State and the FBI also signed a memorandum of understanding in July outlining the terms of the FBI's electronic connectivity to the system. However, it was not until December 2004 that the FBI had developed the ability to gain access to State's electronic tracking system to test the connection and discontinue using the cabling system. Although the FBI no longer actively clears Mantis cases, all agencies and bureaus that receive Mantis cases, regardless of whether they routinely clear cases, must be connected electronically to the system before use of the cabling system can be eliminated. State's goal was to establish connectivity with another intelligence agency responsible for clearing Mantis cases by the end of 2004, but an agency official told us that a deadline of February 2005 was more realistic. State has not set milestones for connecting the remaining agencies that receive Mantis cases to the tracking system. A key agency official told us that providing full electronic connectivity to all agencies that receive Mantis cases will be a gradual process.

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### Students and Scholars from China Are Limited to 6-Month, Two-Entry Visas

China has one of the strictest visa reciprocity schedules for students and scholars. Under the United States' reciprocity agreement with China, visas for F-1 and J-1 visa holders are only valid for up to 6 months, with two entries into the United States allowed.<sup>16</sup> According to a key State official, the agency's instructions to consular officers are to give single-entry, 3-

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<sup>16</sup>The validities of U.S. visas and the number of entries allowed are based on the principal of reciprocity. Visas are issued to nationals of another country based on that country's visa policy toward U.S. citizens. The period of validity of a nonimmigrant visa is the period during which the alien may use it in making application for admission. The period of visa validity has no relation to the period of time the immigration authorities at a port of entry may authorize the alien to stay in the country.

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month visas for applicants who undergo Mantis checks. This reciprocity schedule is one of the primary concerns of the international scientific community. Under the reciprocity schedule, if a Chinese citizen in the United States on an F or J visa leaves the United States, he or she will have to reapply for a visa.

In 2004, State Department officials entered negotiations with the Chinese government to revise the visa reciprocity schedule for business travelers, tourists, and students. However, in December, State officials informed us that, while the Chinese government agreed to extend visa validities for business travelers and tourists, it did not agree to do so for students and scholars. While the new agreement with the Chinese government may address some of the concerns that the business community and tourism industry hold about travel to the United States, students and scholars will still need to reapply for visas frequently.

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## Conclusions

In 2004, State, DHS, and the FBI collaborated successfully to reduce Mantis processing times. However, opportunities remain to further refine the Visas Mantis program and facilitate legitimate travel to the United States. As we reported in 2004, the use of the cabling system to transmit Mantis cases can lead to unnecessary delays in the process. The State Department has also noted that the cabling system is the source of garbled information and other errors. However, agencies continue to receive cases via cable because they are not yet fully connected electronically to State's computer database. State has not established milestones for connecting these agencies to the electronic tracking system. Additionally, because consular officers have only a few minutes to determine whether a visa applicant who appears at their interview window needs to undergo a Mantis check, it is critical that they fully understand the purpose of the Mantis program. Our work suggests that consular officers learn best through direct interaction with those agency officials responsible for implementing the Mantis program in Washington. However, because consular officers at key Mantis posts do not routinely have opportunities for such interaction, there is a risk that they may submit Mantis cases on applicants who do not need them or fail to submit cases when appropriate. Further, officers may fail to include information in their Mantis requests that is most useful to agencies in Washington.

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## Recommendations for Executive Action

In order to further streamline the Visas Mantis process, we recommend that the Secretary of State, in coordination with the Secretary of Homeland Security, take the following two actions.

- In order to eliminate use of the cabling system in the Mantis process, establish milestones for fully connecting all necessary U.S. agencies and bureaus to the computer system used to track and process Mantis cases.
- Provide more opportunities for consular officers at key Mantis consular posts to receive guidance and feedback on the Visas Mantis program through direct interaction with agency officials knowledgeable about the program. These opportunities could include, among other initiatives, mandatory one-on-one meetings with officials from the Bureau of Consular Affairs and Nonproliferation for new consular officers before they travel to post; additional visits by State officials to consular conferences; and more frequent videoteleconferences with posts that submit large numbers of Mantis requests.

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of State, Homeland Security, and Justice for their comments. State, DHS, and Justice provided written comments on the draft (see appendixes II, III, and IV, respectively). State commented that it had already made considerable progress with regard to the report's recommendations and outlined the actions it had taken to do so. For example, State has committed to sending representatives from its Consular Affairs and Nonproliferation Bureaus to India, China, and Russia to engage in on-site discussions of Mantis issues with consular officers. In addition, State is in the process of negotiating and signing memoranda of understanding with five U.S. agencies to share Mantis data electronically. DHS expressed appreciation for our work to identify actions to improve the Visas Mantis process and stated that it will pursue completion of GAO's recommendations.

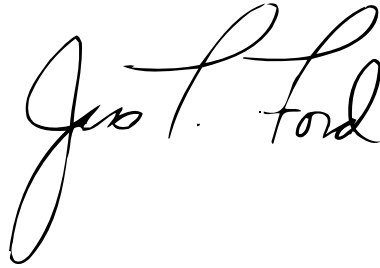
Justice responded to a recommendation included in the draft report that directed the Secretary of Homeland Security and the Attorney General to set a formal timeframe for completing negotiations on FBI access to US-VISIT and SEVIS. Because the two agencies reached agreement prior to publication of the final draft, the recommendation is not included in this report. The Department of Justice also provided technical comments, which we have incorporated where appropriate.



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We are sending copies of this report to other interested Members of Congress. We are also sending copies to the Secretary of State and the Secretary of Homeland Security. We also will make copies available to others upon request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>. If you or your staff have any questions about this report, please contact me at (202) 512-4128 or [fordj@gao.gov](mailto:fordj@gao.gov). Staff contacts and other key contributors to this report are listed in Appendix V.

A handwritten signature in black ink that reads "Jess T. Ford". The signature is written in a cursive style with a large, looping initial "J" and a distinct "T" and "F".

Jess T. Ford  
Director, International Affairs  
and Trade

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# Objectives, Scope, and Methodology

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The scope of our work covered improvements to and implementation of the Visas Mantis program between February 2004 and February 2005. To determine how long it takes to process Visas Mantis checks, we obtained and analyzed data from the State Department's electronic tracking system for Security Advisory Opinions (SAOs). Specifically, we reviewed "SAO Processing Statistics" reports for all Mantis requests submitted to the State Department between April 1, 2004, and August 31, 2004, as well as other Mantis statistics produced by the State Department. These reports showed the average total processing time (in calendar days) for Mantis cases worldwide. To assess the reliability of State's data on Visas Mantis cases, we (1) interviewed State officials responsible for creating and maintaining the electronic tracking system used for Mantis cases, (2) observed use of the tracking system, and (3) examined data collected through the tracking system. We noted in our report that average Mantis processing times, as calculated through State's tracking system, do not take into account Mantis cases that are still pending. As a result, reported average Mantis processing times can change as cases that have been pending are cleared. State may also calculate average Mantis processing times based on the date on which a consular post initially drafted a Mantis case, rather than the date on which the consular post submitted the final draft to Washington. As a result, total Mantis processing times can seem longer than they really are. Despite these limitations, we determined that the data were sufficiently reliable for the purposes of identifying trends in Mantis processing.

To identify and assess actions taken to implement our recommendation to improve the Visas Mantis program, we obtained documentation from key U.S. agencies, primarily the State Department, interviewed officials from these agencies, and observed training classes for new consular officers at the State Department's Foreign Service Institute. We reviewed the Immigration and Nationality Act, the Foreign Affairs Manual, the Bureau of Consular Affairs' quarterly reports on Visas Mantis, and other cables and related documents from that bureau. In Washington, we interviewed officials from the Departments of State, Homeland Security, and Justice. At State, we met with officials from the Bureau of Consular Affairs and the Bureau of Nonproliferation. At the Department of Homeland Security, we met with officials from the Directorate of Border Transportation and Security. At the Department of Justice, we met with officials from the Federal Bureau of Investigation's Name Check Unit. We requested a meeting with Department of Justice and FBI officials to discuss negotiations with DHS regarding access to US-VISIT and SEVIS; they agreed to answer questions in writing. In August 2004, we observed classes at the Foreign Service Institute for newly assigned consular officers. As

part of that training, we attended the Visas Mantis briefing that had been added to the curriculum for new officers in response to our recommendation in the February 2004 report.

To identify whether there were any remaining issues that affect the total amount of time it takes for science students and scholars to obtain visas, we analyzed data on interview wait times, spoke with representatives of various educational organizations, and observed a roundtable discussion on Mantis issues sponsored by the Senate Foreign Relations Committee. We obtained data on interview wait times at consular posts worldwide from State's Bureau of Consular Affairs. We also obtained information on interview wait times from the consular posts in China and Russia. We met with representatives from the National Academies of Science, NAFSA: Association of International Educators, and the Alliance for International Education. The roundtable discussion we attended involved officials from the Departments of State and Homeland Security, as well as representatives from the International Institute for Education; the Association of American Universities; the National Institutes of Health; the National Academies of Science; NAFSA: Association of International Educators; and others. Representatives from various colleges and universities were also in attendance.

We conducted fieldwork at five visa-issuing posts in three countries—China, Russia, and Ukraine. We chose these countries because they are leading places of origin for international science students and scholars visiting the United States and because they account for 78 percent of all Mantis cases. During our visits to these posts, we observed visa operations, reviewed selected Visas Mantis data, and interviewed consular staff about the Visas Mantis program. In China, we met with consular officers at the U.S. Embassy in Beijing and the consulates in Shanghai and Guangzhou. We also met with the Deputy Chief of Mission, as well as officials from the Office of the Defense Attaché; the Office of Environment, Science, Technology, and Health; the Office of Public Diplomacy; and the Foreign Commercial Service. In Beijing, we observed a meeting of the American Chambers of Commerce in China, where they discussed their experience with the Visas Mantis program. In both Shanghai and Guangzhou, we met with the Consul General. In Russia, we met with consular officers at the U.S. Embassy in Moscow. We met with the Consul General and his Deputy, as well as officials from the Department of Energy; the Office of Environment, Science, Technology, and Health; and Public Affairs. In Ukraine, we met with consular officers at the U.S. Embassy in Kiev. We met with the Deputy Chief of Mission, the Consul General and her Deputy, as

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well as officials from the Department of Energy; the Office of Public Affairs; and the Office of the Defense Attaché. Furthermore, in both Russia and Ukraine we held meetings with various organizations that sponsor summer work/travel exchanges, and they expressed their opinions and observations about the effects of U.S. visa policy on their programs.

We conducted our work from July 2004 through February 2005 in accordance with generally accepted government auditing standards.

# Comments from the Department of State



United States Department of State

*Assistant Secretary and Chief Financial Officer*

Washington, D.C. 20520

FEB - 3 2005

Ms. Jacquelyn Williams-Bridgers  
Managing Director  
International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548-0001

Dear Ms. Williams-Bridgers:

We appreciate the opportunity to review your draft report, "BORDER SECURITY: Streamlined Visas Mantis Program Has Lowered Burden on Foreign Science Students and Scholars, But Further Refinements Needed," GAO Job Code 320300.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Paul Doherty, Division Chief, Bureau of Consular Affairs, Office of Visa Operations, at (202) 663-1246

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher B. Burnham".

Christopher B. Burnham

cc: GAO – John Brummet  
CA – Maura Harty  
State/OIG – Mark Duda

**Department of State Comments on Draft Report**  
**“Streamlined Visas Mantis Program Has Lowered Burden on Foreign**  
**Science Students and Scholars, But Further Refinements Needed.”**  
**(GAO-05-198, GAO Code 320300)**

The Department of State appreciates the opportunity to comment on the report of the Government Accountability Office entitled: *Streamlined Visas Mantis Program Has Lowered Burden on Foreign Science Students and Scholars, But Further Refinements Needed*. We have already made considerable progress in regard to the report’s recommendations and we have taken additional steps as well.

Monthly Videoconferences

The Consular Affairs (CA) Bureau and the Nonproliferation (NP) Bureau continue to hold monthly videoconferences (DVC) with consular officers at leading Mantis-submitting posts, an effort that began in early 2004. To date we have held 10 DVCs with half a dozen more planned for the first half of 2005.

Meetings with Posts

We have also stepped up efforts to provide direct guidance to consular officers on Visas Mantis policy and procedural issues. Representatives of CA and NP traveled to posts in India at the end of this month to engage in on-site discussions about Visas Mantis issues with consular officers in the three major Mantis-submitting posts. In February, CA officials will travel to consular conferences in China and Russia and will discuss Visas Mantis issues with consular officers in those countries.

Electronic Transmission of Data

We have made important strides in achieving electronic connectivity for other Mantis clearing agencies to the Department’s automated Security Advisory Opinion (SAO) program in the Consular Consolidated Database (CCD). In December 2004 the FBI namecheck unit achieved full connectivity to the CCD. Since that time, they have been extracting Mantis and other SAO data directly from the CCD, running it through their

namecheck database, and uploading the results into the CCD. The electronic transmission of clearance data has helped reduce processing times significantly. FBI is working on a method of transferring SAO data from the CCD electronically to end-users within the Bureau.

We continue discussions with intelligence community entities about connectivity and internal distribution of SAO data and we're hopeful that connectivity can be achieved by mid-year. We are also in the process of negotiating and signing MOUs on sharing SAO data through the CCD with DHS, DIA, DOC, TSC and the CDC.

Visa Reciprocity for Chinese Travelers

Regarding a change to visa reciprocity for Chinese students and scholars, in 2004 we reached an agreement with the Government of China to extend the validity of tourist and business visas from multiple entry/six months to multiple entry/12 months. We continue in discussions with the Chinese to achieve increased reciprocity for students and scholars.

Validity of Mantis Clearances

We are ready to implement the proposal to increase the clearance validity periods for the various Mantis visa categories as soon as final details can be worked out.

# Comments from the Department of Homeland Security

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

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



**Homeland  
Security**

January 28, 2005

Mr. Jess T. Ford  
Director, International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Mr. Ford:

RE: GAO-05-198, Border Security Streamlined Visas Mantis Program Has Lowered Burden on Foreign Science Students and Scholars, But Further Refinements Needed (GAO Job Code 320300)

Thank you for the opportunity to review and comment on the draft report related to the Visas Mantis Security Advisory Opinion process for foreign science students and scholars. The Department of Homeland Security (DHS) appreciates the work done in this review to identify areas where actions can be taken to improve the Visas Mantis process. A few areas of the report deserve comment.

Like the Department of State (DOS), DHS officials received many complaints from the academic, scientific, and business communities regarding the lengthy visa process. DHS is proud of its involvement with DOS to identify and implement solutions to the Visas Mantis process that have been successful in reducing the Visas Mantis process time. Both DHS and DOS agreed that awaiting a Federal Bureau of Investigation (FBI) clearance on Mantis cases in some instances added time to the process. Accordingly, DHS and DOS jointly suggested that the FBI become a silent partner in Mantis cases, receiving the Mantis information without actively clearing each case. As your report indicates, this change has resulted in a significant reduction in Mantis processing time. In addition, under DHS' visa policy authority in section 428 of the Homeland Security Act and the resulting Memorandum of Understanding (MOU) with DOS, DHS is developing a "backstop" function to resolve problem SAOs pending longer than a reasonable amount of time.

DHS and DOS also jointly agreed upon extending the Mantis validity periods for students, researchers, and business travelers. With respect to the FBI receiving access to US-VISIT, the draft report should be corrected to indicate that the FBI requested access to US-VISIT and Student and Exchange Visitor Information System (SEVIS) information. Further, US-VISIT does not contain the SEVIS database. Rather, US-

[www.dhs.gov](http://www.dhs.gov)

See comment 1.



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**Appendix III**  
**Comments from the Department of Homeland**  
**Security**

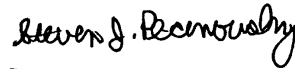
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VISIT and SEVIS exchange data with each other. DHS is confident that DOJ and DHS will sign the data access MOU within a couple of weeks. Authority for extending the Mantis validity period will be sent to the DOS consular posts within that same time frame. DHS believes that such extensions will significantly improve the Mantis process for both DOS and affected travelers.

Finally, DHS strongly encouraged DOS to vigorously pursue longer visa reciprocity schedules with China to prevent Chinese students and researchers from having to apply for visas so frequently. While DOS was successful in obtaining a longer visa validity period for business travelers and tourists, your report correctly states that China did not agree to such validity periods for students. DHS will continue to encourage DOS negotiations with China regarding student visa validity periods to further streamline and improve the visa process for students.

DHS strongly believes that foreign students and scholars offer the United States invaluable diversity, intellectual knowledge, and are an economic resource. DHS will pursue completion of its own recommendations to improve the Mantis process, including those of the GAO. DHS will also continue to evaluate the visa process and policies to identify and implement visa improvements in accordance with the Administration's guiding principle of "Open Doors, Secure Borders."

Sincerely,



Steven J. Pecinovsky

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**Appendix III**  
**Comments from the Department of Homeland**  
**Security**

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The following are GAO's comments on the Department of Homeland Security's letter dated January 28, 2005.

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**GAO Comment**

1. We have revised the report to reflect the fact that the FBI requested access to both US-VISIT and the Student and Exchange Visitor Information System and that US-VISIT does not contain SEVIS.

# Comments from the Department of Justice

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



U.S. Department of Justice

Washington, D.C. 20530

FEB 7 2005

Jess T. Ford  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G. Street, NW  
Washington, D.C. 20548

Dear Mr. Ford:

Thank you for the opportunity to review and comment on the Government Accountability Office (GAO) draft report GAO-05-198 entitled "Border Security: Streamlined Visa Mantis Program Has Reduced Burden on Foreign Science Students and Scholars, But Further Refinement Needed." The Department provided its technical comments under separate cover to Elizabeth Singer, GAO Analyst-in-Charge. The comments below are the Department's formal comments for inclusion in the GAO published report.

The draft report recommends that the Secretary of Homeland Security and the Attorney General set a formal timetable for completing negotiations on the terms of the Federal Bureau of Investigation's (FBI) access to the US-VISIT program. We do not believe that this recommendation is warranted at this time. Presently, the FBI has limited access to US-VISIT through user accounts established at FBI headquarters. In addition, the FBI and the Department of Homeland Security (DHS) have agreed to a pilot project in which DHS is providing sample extracts to the FBI of US-VISIT data. This pilot, which is scheduled to be completed by the middle of February 2005, is designed to identify any remaining technical and operational issues that need to be resolved before DHS can begin the routine transfer of data in US-VISIT to the FBI. Finally, DHS and the FBI have been negotiating a memorandum of understanding that will govern the sharing of information in US-VISIT and the Student and Exchange Visitor Information System. This agreement is close to completion. The FBI and DHS have agreed to the basic terms of the agreement. The only remaining issue involves the sharing of visa records, and this final issue may be resolved within the next week. Accordingly, because we are close to a final agreement, it is not necessary for the Secretary of Homeland Security and the Attorney General to establish a more formal timetable for completing these negotiations, as the draft report recommends.

See comment 1.

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**Appendix IV**  
**Comments from the Department of Justice**

Jess T. Ford

Page 2

If you have any questions regarding our comments, please contact Richard P. Theis, Acting Director, Audit Liaison Office.

Sincerely,



Paul R. Corts  
Assistant Attorney General  
for Administration

cc: Francesco Isgro, ODAG  
Cheryl Johnston, Audit Liaison, FBI  
Dawn Burton, ODAG

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The following are GAO's comments on the Department of Justice's letter dated February 7, 2005.

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**GAO Comment**

1. Because the Departments of Homeland Security and Justice reached agreement on the FBI's access to US-VISIT and SEVIS prior to publication of the final draft, we did not include the recommendation in this report. The validity period for certain Visas Mantis clearances was extended on February 11, 2005.

# GAO Contacts and Staff Acknowledgments

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## GAO Contacts

Jess Ford (202) 512-4128  
John Brummet (202) 512-5260

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## Acknowledgments

In addition to those named above, Elizabeth Singer, Carmen Donohue, Maria Oliver, Judith Williams, Mary Moutsos, Joe Carney, Martin de Alteriis, and Etana Finkler made key contributions to this report.

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Paul Anderson, Managing Director, [AndersonP1@gao.gov](mailto:AndersonP1@gao.gov) (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
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