



# U.S. Citizenship and Immigration Services

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WRITTEN TESTIMONY

OF

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DEPARTMENT OF HOMELAND SECURITY**

FOR A HEARING ON

**“IMMIGRATION BENEFITS VETTING: EXAMINING  
CRITICAL WEAKNESSES IN USCIS SYSTEMS”**

**BEFORE**

**HOUSE COMMITTEE ON HOMELAND SECURITY,  
SUBCOMMITTEE ON OVERSIGHT AND MANAGEMENT EFFICIENCY**

**MARCH 16, 2017**

**9:30AM**

**210 HOUSE VISITOR CENTER  
WASHINGTON, DC**

Chairman Perry, Ranking Member Correa, and Members of the Subcommittee, thank you for this opportunity to discuss information technology systems at U.S. Citizenship and Immigration Services (USCIS). I am Lori Scialabba, the Acting Director of USCIS.

Bringing our nation's legacy paper-based immigration system into the digital age remains a substantial work in progress. And it's not simply an IT challenge. The United States has the largest immigration system in the world. In Fiscal Year 2016 alone, USCIS received over eight million petitions and applications filed for people wanting to live here, work here, study here, invest here, bring foreign relatives or adopted children here, or become citizens. As a component of the Department of Homeland Security (DHS), USCIS has a dual mission – to keep Americans safe and ensure the integrity of our immigration system as we fulfill our promise as a nation of immigrants.

Given today's threats, there is no higher priority for us than continuing to expand and integrate our fraud detection and national security operations into all areas of our work. Building a technically reliable electronic case management system is not enough. It must safeguard against fraud and abuse, and ensure that immigration benefits are not provided to individuals who wish to do us harm.

USCIS currently processes approximately 25 percent of casework through computer files rather than thick folders of paper. That's a significant accomplishment given our paper-bound history. We are committed to expanding our digital capabilities, and taking IT techniques from the private sector and adapting them to the immigration context wherever possible.

Per your invitation letter, you have called this hearing to focus on findings by DHS' Office of Inspector General (OIG) and the Government Accountability Office (GAO), including findings about our Transformation program. I would like to note that two months ago, in January, the Transformation program became part of the USCIS Office of Information Technology (OIT), which means that our Chief Information Officer now has the responsibility to oversee its day-to-day operations to ensure it delivers value for our investment. And by that I mean the investment of fees paid by those seeking immigration benefits, as USCIS is almost entirely funded by fees.

Over the last few months, the OIT team has conducted various internal assessments of the Transformation program's status, and have carefully reviewed the independent assessments that were conducted by the OIG and GAO. Based on the information gathered and knowledge of IT industry best practices, we have assembled a plan designed to improve the program's performance and ensure that it delivers on its intended outcomes. This approach will be discussed later in my testimony.

Since initiating this effort USCIS has worked hard to bring contemporary IT practices into our environment, not just at USCIS, but around DHS and the rest of the federal government. The Transformation program is an excellent opportunity to take the current, most promising practices of industry and apply them to a large government need.

Transformation began in 2005-2006 as a USCIS program whose intention was to thoroughly modernize IT systems. The program was created to move the agency from a paper-based process to an electronic process, improve the efficiency of adjudication, provide better service to those

seeking benefits, and adopt a person-centric view of our data. Such a modern and efficient system would ultimately help improve our national security. The original scope and purpose of the Transformation program was broad and vast. Unfortunately these broad intentions have made it difficult for the program to focus on specific business objectives, and to make good prioritization decisions about where to focus resources.

The program began with a large contract to a single system integrator to manage virtually all aspects of the Transformation effort. In addition to building an extensive IT system, called the Electronic Immigration System, or ELIS, this contractor was tasked with leading business process re-engineering, stakeholder communications, training, requirements elicitation, and of course all of the development coding and testing. When the system integrator finally delivered the first release of the product, in May 2012, it was a radically scoped-down version of our intent and accomplished only a small subset of the work of a relatively narrow part of the agency's day-to-day mission. It actually slowed the agency's work.

Given USCIS's negative experience with this first release of ELIS, we decided to make a number of changes to our strategy. First, we decided to replace the single large system integrator with several smaller contractors, and have the government serve as the integrator. We devised a new contracting approach that encouraged good performance by the contractors through continual competition for additional work from us. Second, and very importantly, we changed to an agile development approach that allowed us to see frequent, finished work from the contractors, so we could make sure the project was always moving forward. With an agile approach, rather than waiting a long time for the product to be completely built and delivered before discovering if it works or satisfies the agency's needs, the system is constructed in pieces, with each part tested to make sure it works well with the other pieces. Third, we realized that the original design of the system was one of the reasons development was slow and problematic. It was based on integrating about 30 different proprietary products—and it turned out that they didn't work together very well. So we decided to switch to a more standard approach, based on open source frameworks based on non-proprietary software. Finally, we decided to move to the public cloud; in other words, procuring storage space on secure servers to store some of our data as many federal agencies now do. These changes have enabled us to operate more efficiently, build more quickly, and detect and fix bugs along the way.

It took several years to fully implement these changes, but with the new design, contracts, process, and the cloud environment, the program began to deliver new functionality on a regular cadence. In fact, it currently releases small pieces of new functionality approximately four times a week—a far cry from the old way of doing things, where releases came more on the order of annually—or in the case of Transformation, about six years for the first release.

In November 2015, the program first launched its electronic version of the Application for Replacement Green Card (Form I-90) in the redesigned version of the system. This was a major milestone, as the Green Card replacement accounts for about 10% of the agency's workload. It was followed, in 2016, by electronic processing of Applications for Temporary Protected Status (Form I-821) and requests for Consideration of Deferred Action for Childhood Arrivals (Form I-821D), as well as making the program the only source for collection of the required immigrant fee for Green Card processing. Altogether, these lines of business account for approximately 25 percent of the agency's workload. It is important to know that “electronic processing” does not mean that a computer makes the adjudication. It means that scanned versions of immigration

applications and requests and supporting documents are ingested into our systems so an officer can view and process them on a computer. Our officers make the final decisions with the help of this electronic processing system.

In 2016, we moved to take the next step and bring one of the agency's most important, but also most complicated, products into ELIS: the Application for Naturalization (Form N-400). We anticipated there could be issues, as there often are with any major IT launch. Our agency leadership was prepared to suspend the rollout if necessary, and that is exactly what USCIS did when problems surfaced after the launch. In August 2016, we returned to ingesting newly filed N-400s into our legacy system, known as CLAIMS 4, to minimize any disruption in processing of naturalization applications while we corrected identified systems issues.

As the Inspector General is aware, we continue to process the approximately 240,000 N-400 naturalization cases that were started in ELIS. They are not sitting idle while we await systems modifications. In order to ensure the integrity of the ELIS process, we are conducting 100 percent quality assurance checks of TECS background checks in two ways—once through ELIS and again outside of ELIS – and then comparing the results to ensure consistency. In addition, we continue to monitor all of the background check functionality, including FBI name checks, and resolve any anomalies as they occur. USCIS has also recently established a Background Check Working Group to continually evaluate security check procedures and to recommend optimal background check approaches to be adopted agency-wide.

USCIS has been adamant that new work will not shift back into ELIS until improvements are made to how ELIS handles naturalization processing. These include streamlining the printing and scanning processes, establishing a 'contingency plan' for continuing to conduct interviews even if there is an ELIS outage, and formalizing some measure of the above-described redundancy in our background checks. It should be noted that the Inspector General validated our internal recommendations in the January 19, 2017 management alert ("U.S. Citizenship and Immigration Services' Use of the Electronic Immigration System for Naturalization Benefits Processing").

Taking a wider view of building the infrastructure for a modern immigration system, USCIS agrees with the July 2016 GAO assessment that "Regarding software development, the Transformation program has produced some software increments, but is not consistently following its own guidance and leading processes." GAO found that Transformation program practices were beginning to diverge from those used by leading companies. In my view, Transformation is one of the most advanced government programs in using contemporary IT delivery practices. But this is not an area where you can go halfway and get good results.

GAO recognized that Transformation's frequent use of automated testing, and continuous build and integration, were good practices that provided an ability to deliver quickly and consistently. The Transformation program, GAO also pointed out, "has established an environment that allows for effective systems integration and testing and has planned for and performed some system testing. However, the program needs to improve its approach to system testing to ensure that USCIS ELIS meets its intended goals and is consistent with agency guidance and leading practices." GAO found discrepancies between some of the practices being used by the Transformation program and the guidance issued by OIT. Now that Transformation has been incorporated into OIT as of January of this year, we will ensure appropriate oversight of the

program. As part of OIT, Transformation will be assisted by having full access to OIT's developers, applications, and systems already in existence within the agency.

Although the GAO and OIG findings have been helpful to us in diagnosing issues in the program, I would like to update the subcommittee on two points. First, the Inspector General correctly pointed out a number of problems in the ELIS I-90 (replacement Green Card) release. However, the OIG study was conducted shortly after the launch of the electronic I-90, a time when it is typical for IT systems to have kinks that need to be worked out. Notably we implemented an asynchronous handoff process to handle potentially sporadic connectivity between ELIS and the Enterprise Service Bus (ESB) to ensure timeouts between the systems would not inadvertently result in duplicate cards being produced. Second, in regard to concerns about some Green Cards being mailed to wrong addresses, we are now implementing a fix to enable applicants to answer a series of questions to verify their identity in order to update their address online. This fix will help so that changes of address are made by the applicant as early in the process as possible in order to avoid instances of Green Cards being mailed to an applicant's prior address.

Also, the OIG report provided data on three cost estimates which could be read to infer that the cost of the program has been increasing over time, beginning with \$536 million in the original Acquisition Plan, \$2.1 billion in the original lifecycle cost estimate, and finally \$3.1 billion in the revised lifecycle cost estimate. It is important to clarify that the first cost estimate of \$536 million was based on the original development and support contracts awarded for system development under the previous waterfall approach, and included a base contract period of performance of four months followed by five option periods covering a total of five years and one month. It was not an approved, finalized cost estimate that covered the traditional investment and operations and maintenance periods found in a lifecycle cost estimate. In contrast, the \$2.1 billion cost estimate was based on a lifecycle cost estimate that included system development and maintenance costs covering a 16 year period from 2006 through 2022. Finally, the \$3.1 billion cost estimate was based on an updated life cycle cost estimate that also included system development and maintenance costs, but was expanded to cover a 27 year period from 2006 through 2033.

Finally, I would like to report on some of the actions USCIS is taking that are consistent with the OIG and GAO findings to improve the performance of the program:

- USCIS recently incorporated the Transformation program into the Office of Information Technology and has made organizational changes so that we can bring the many technical skills and processes of OIT to bear on the program.
- USCIS is clarifying the scope of the program, especially where it overlaps with other agency initiatives. The Program is focusing on the lines of business that will truly transform the agency.
- We are working to fix the five issues specifically identified by USCIS that prevented us from continuing to move forward with accepting new naturalization cases into ELIS. We are making good progress and expect those issues to be resolved in the near future.

- We are working with DHS to clarify the specific outcomes that we want to achieve with each process we bring into an electronic environment. And we are devising metrics and monitoring tools that will allow us to measure our success in accomplishing these outcomes.
- We are also establishing uniform standards for what constitutes a well-tested piece of code, and adopting more development processes similar to those used by major companies.

We are fortunate to have an extremely dedicated, extremely talented team at work on the program. We hope that the changes we are making will address the important points raised by the Inspector General and GAO, so that the program can truly transform the way our agency processes immigration benefits and services.

Again, thank you for this opportunity to discuss what USCIS is doing to support the mission of Homeland Security. I am happy to address your questions.