USCIS project critical first step in modernizing immigration system
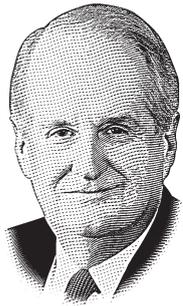
By JAMES W. ZIGLAR

The conventional wisdom and, in large part, the reality, is that Washington is gridlocked on immigration policy and generally inept in its management of the immigration system. But while politicians dither and ignore the fact that our immigration laws are hopelessly dysfunctional and out of date, the leadership of U.S. Citizenship and Immigration Services (USCIS), and the men and women who work behind the scenes there, have worked to improve the efficiency of the system and the security of our nation.

With little fanfare, USCIS on May 22 rolled out the first phase of a massive project to harness 21st century technologies in managing our overly complex immigration system.

The first phase of this new online processing system, known as USCIS ELIS (a clever harkening back to the nation's Ellis Island history), will allow certain immigrants and visitors whose legal presence in the United States already is established to apply online for status adjustments, receive notices and inform USCIS regarding changes of address, marital status and other data important to our security interest in knowing their whereabouts and status.

Improved fraud detection and thwarting of criminal activity are among the most important goals of USCIS ELIS. The platform on which this system is being built was conceived during the George W. Bush administration. The Obama administration embraced and improved this initiative and has helped turn this concept into reality.

The launch of USCIS ELIS undoubtedly will draw little public attention, particularly in an era when it is more popular to excoriate the government for its perceived failures than to recognize the accomplishments that have occurred with enforcement at the borders and within the country, as well as with the strengthening of processes within Department of Homeland Security agencies that deal with immigration. And that's OK, because the public good is still being served without the fanfare.

But it is worth noting why this initiative is so important.

For decades, the immigration processing system has been paper-based, and it has continued as such long after electronic records became the standard. This archaic system has caused untold harm to honest and well-meaning individuals through long delays, lost applications and high fees. It also has been a dis-couraging factor for many talented immigrants who would prefer to come to the U.S. rather than migrate elsewhere in search of economic opportunity and personal fulfillment. This situation is cause for concern, as other nations increasingly compete for the talent that can keep their economies vibrant in an ever more globalized world.

This antiquated system also has contributed to security gaps and lapses because of the difficulty in gathering, retrieving and disseminating real-time information. One indication of the magnitude of the paper churned through the system: Applications received by USCIS each day would create a pile of paper almost twice as high as the Statue of Liberty. There can be little mystery as to why our immigration civil servants have long struggled to keep up with the volume of work imposed on them by this inefficient system.

The USCIS announcement is only the first step in modernizing our immigration system, but it is a critical step in enhancing national security, reducing costs and building the agency's capacity to deal with changes in immigration law that inevitably will occur when our policymakers finally realize that deporting 11 million people is impractical, politically and economically unacceptable, and inconsistent with the values of most Americans.

Bipartisanship and consistency in policy from administration to administration may not be in vogue, but the Bush administration should be commended for conceiving the USCIS transformation, and the Obama administration for its leadership in bringing this system to fruition. ☐

James W. Ziglar served as commissioner of the Immigration and Naturalization Service during the George W. Bush administration. He is a senior fellow at the Migration Policy Institute, a nonpartisan, independent think tank in Washington that studies U.S. and international immigration policy and trends.

How agencies can get a leg up in stopping improper payments

By WENDY MORRIS and RUFUS JOHNSON

The Improper Payments Elimination and Recovery Act (IPERA) was implemented in July 2010 with the goal of reducing improper payments by $50 billion by 2012. IPERA expanded payment types for review and lowered dollar thresholds when compared with earlier law.

Requirements to conduct program risk assessments and to recover improper payments have become critically important, yet agencies have flexibility on how and when to conduct the assessments and payment-recapture audits.

With more than a year passed since IPERA's enactment, the results of agencies' compliance activities are in, and the findings indicate some common challenges. As agencies review their performance in advance of the next audit, a few tips may help performance this year:

Integrate IPERA requirements into day-to-day business. By doing this, agencies have an opportunity to recognize an array of direct and residual benefits. For example, agencies can achieve cost savings by eliminating the need for external auditors and internalizing measurement and control procedures. Ingraining easily repeatable practices into agency operations can result in reduced improper payments and increased recoveries. Improved internal controls over payment accuracy can reduce time allocated to assessment and recovery procedures, allowing staff to focus on more pressing issues.

In December 2011, Morgan-Franklin conducted an independent review of all agencies' self-reported data and found some encouraging signs. Several agencies launched reviews into existing payment-monitoring processes. For example, the Interior Department included pre- and post-transaction reviews of travel voucher audits and invoice payment reviews. The Education Department incorporated payment recapture activities into its A-123 internal controls reviews.

Develop strong corrective action plans. Identifying improper payments is only part of the challenge. There is strong incentive in the current budgetary climate to reduce improper payments and recover additional funds. The challenge is determining how to effectively take corrective action. This is accomplished by understanding the root causes of the issues and creating meaningful, measurable and actionable plans.

A meaningful plan will, by necessity, result in measurable outcomes. Defining metrics encourages accountability and reduces stagnation, as many agencies already know where problems exist. An actionable plan can be broken down into individual steps for performance by staff and monitoring by management. Agencies may also identify dependencies that need to be addressed — such as required coordination with other agencies or additional information technology or human resources.

Based on review of agency financial reports and performance and accountability reports, the most impressive corrective actions shared common characteristics, such as well-organized and clearly documented plans; clearly defined root causes; specific actions identified to remediate issues; target completion dates; and assignments to responsible parties.

Get back to basics with internal controls. Effective prevention and detection of improper payments requires strong internal controls. A review of the 24 agency financial reports and performance and accountability reports revealed that the most frequent cause of improper payments was documentation and administrative error — specifically, mathematical errors, untimely or inaccurate data entry, and lack of supporting documentation.

Errors could be avoided through implementation of effective preventive and detective controls. As a result of these root causes, a number of agencies went further than simply performing the procedures laid out by IPERA, and also ramped up internal controls. For example, the Commerce Department limited access to vendor contact information and areas of the financial system. And the Office of Personnel Management updated internal requirements and payment-review procedures to help recognize and eliminate payment errors. ☐

Wendy Morris is a director and Rufus Johnson is a senior associate at MorganFranklin Corp.