**U.S. Citizenship
and Immigration
Services**

August 22, 2018 - sent via email

Ms. Alina M. Semo
Director
Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

Dear Ms. Semo:

Thank you for the opportunity to address the recommendations made by the Office of Government
Information Services (OGIS) in its Compliance Assessment of the Freedom of Information Act (FOIA)
program administered by U.S. Citizenship and Immigration Services (USCIS).

Please find attached USCIS' response to the four recommendations contained in the OGIS Assessment
dated February 9, 2018.

The FOIA program at USCIS consistently strives to improve both its performance and the service
provided to the requester community. We are confident that the recommendations made by OGIS will
strengthen our performance and assist the Agency in fulfilling its responsibilities under the FOIA statute.
Please extend our appreciation to your staff for the valuable assessment of our program.

Sincerely,

Jill A. Eggleston
Associate Center Director FOIA/PA

Follow-up to Compliance Assessment of the Freedom of Information Act (FOIA) program at U.S. Citizenship and Immigration Services (USCIS)

Date: July 10, 2018
Date Report Issued: February 9, 2018

The Freedom of Information Act (FOIA), which established the Office of Government Information Services (OGIS), 5 U.S.C. § 552(h), mandates that the office review agencies' FOIA policies, procedures and compliance. We assessed the FOIA program at U.S. Citizenship and Immigration Services (USCIS) and issued a report on February 9, 2018. As part of our assessment program, we follow up with agencies 120 days later to understand what actions the agency took to address our recommendations for improving the administration of FOIA.

Finding 1: USCIS has an efficient FOIA process in place but is not able to respond within the 20-working-day statutory response period imposed by the statute.

Recommendation: Continue to work with the component's leadership to ensure that the FOIA program has sufficient staffing to respond to requests and reduce its backlog.

Agency Response: The FOIA program continues to work with USCIS leadership to ensure staffing levels are sufficient to respond to incoming workload in an effort to reduce the FOIA backlog. During Fiscal Years 17 and 18 the FOIA program was authorized additional full time staff, bringing the total number of authorized personnel today to 248. In addition to full time government staff, USCIS entered into a FOIA backlog contract in September, 2017, increasing the number of personnel focused on FOIA backlog reduction efforts.

Finding 2: USCIS's current FOIA tracking and processing system is outdated and a replacement system is under development.

Recommendation: Continue to explore how technology can be used to improve efficiency. Weigh the costs and benefits of producing machine-readable digitized versions of A-Files that would enable FOIA processors to use computer-assisted review tools.

Agency Response: USCIS is custom building a new FOIA processing system, FOIA Immigration Records SysTem (FIRST) to fit our agency's need in both efficiency of processing and automated workflow. During the requirements development for FIRST the use of Optical Character Recognition (OCR) technology was considered. At this time however, image resolution along with the type of documents frequently found in A-files makes OCR unreliable and too costly. The agency will continue to evaluate this technology in the future.

Recommendation: explore technologies to mark records as processed and enable the FOIA processor to easily access the previously processed version of that record.

Agency Response: As set forth above, we will continue to evaluate Optical Character Recognition (OCR) technology as our USCIS records evolve to a paperless environment. In the meantime, our custom built FIRST system will identify duplicate requests for the same record and provide identification of, and access to, previously processed archival records.

Finding 3: USCIS communicates with requesters about possible delays in responding to a request, and encourages requesters to narrow the scope of a request to qualify for a faster moving track.

Recommendation: Add appropriate contact information to USCIS online request tracking page to make it easier for requesters to narrow the scope of their request and potentially qualify for a faster processing track.

Agency Response: Contact information for the FOIA Public Liaison has been added to the USCIS online request tracking page. In addition, the design of our new online submission form through FOIA Immigration Records SysTem (FIRST) will encourage requestors to narrow the scope of their request by highlighting reduced processing times associated with specific document requests. Further, the FIRST online drop down menu lists "Full A-file Request" as the last option. This design feature forces an individual to consciously scroll down through menu options, eliminating the selection of "Full A-file Request" as the path of least resistance.