TSC Service Center Stakeholders' Meeting – 10/21/2010

Hosted by: Jack Jaggers – TSC Community Engagement Officer and Kristi Barrows – TSC Deputy Center Director

Session: I-765 Overview (Led by Officer Maleathia Okawada)

EAD terminology: "Replacement EAD" = lost, damaged, stolen, not received in the mail; "renewal EAD" = already has been issued authorization that is expiring; and "interim EAD" = if cannot produce card within 90-day processing time. Methods for requesting interim EAD:

- InfoPASS appointment at District Office
- Use tsc.schools email address
- Call National Customer Service Center (NCSC)

Eligibility categories: generally (a) = temporary in the U.S., may request employment permission and (c) = other aliens who must apply for authorization to work (with/without restrictions).

TSC – works 23 of 47 categories of I-765
- (c)(8) – Asylee Pending
- (c)(9) – Pending I-485
- (c)(3) – Students
  - (c)(3)(A) – pre-completion Optional Practical Training
  - (c)(3)(B) – post-completion Optional Practical Training
  - (c)(3)(C) – STEM
  - (c)(6) – M-1 Practical Training
    - 1 month of OPT for every 4 months of study (6 months of OPT max)

Economic Hardship
- Need to document the unforeseen hardship
- Suspect of long-term need, or requests for economic hardship for multiple programs – applications will face more scrutiny

Asylum Pending EAD – (c)(8)
- Apply for Affirmative Asylum
  - Go straight to Asylum Office immediately after entry and apply/claim
- Defensive Asylum – get caught and then apply for asylum
- (a)(5) – application for EAD when already granted asylum
- 90-day processing time for EADs
  - Except for "American Baptist Church" cases (Cubans) = 21 days
  - Cannot apply until have been in the U.S. for 150 days
    - TSC can check time tolled

- Prefer than the applicant include any documentation that verifies time since application/grant
  - Receipt of application or letter from immigration court
- If category changes (e.g. Asylum Pending (c)(8) to Asylum Granted (a)(5)), call NCSC to report change

Common Problems and Filing Tips

Common I-765 Problems/Errors
- Photos do not meet specifications
- Initial evidence not submitted
- Initial evidence not mailed in for E-filed applications
- Applicant failed to attend Biometric appointment for E-filed applications
- Application not filled out completely or correctly
  - Including not checking one of the Boxes for "Purpose of Application"
- Missing signatures

Common Problems Resulting in Processing Delays
- No evidence of NSEERS compliance (if applicable)
- (c)(8) applicants – Asylee status change
- Security checks

Tips for Helpful Information for I-765 Petitions
Important to review/check form instructions
- Available online (uscis.gov)
  - Provides most updated form version

For Replacement EAD
- Evidence of lost/destroyed card
  - Policy record, letter card destroyed in fire, etc.

For Renewal EADs
- Copies of prior EAD cards should be submitted

For Renewals filed more than 120 days before previous EAD expires
- An explanation of why the alien is seeking a new EAD this early should be submitted

TSC I-765 Workflow

How is the workload allocated at the TSC?
- Separated by categories
- Whole team is able to work all categories of I-765 processed at TSC

- Workload is first-in, first-out, regardless of category

OPT EAD cancellation Requests

"Can request for cancellation be submitted and processed, thus 'saving' OPT time?
- Email (tsc.schools@dhs.gov) or fax cancellation request
- Prefer in advance of start date on EAD card
- Include a letter/email if used any time of the EAD card, TSC will try to "refund" any unused time
- *NAFSA member NOTE – while the above was stated that MAY get refund of unused time even if some EAD time was used, this is NOT policy wide at Service Centers so don't count on "refund" or "recapture" of time if any EAD time was issused*

Luncheon Plenary (Rachel Ellis, Office of Public Engagement)

- Office of Public Engagement (OPE) is 1 year old

OPE consists of 3 Divisions
- Community Relations/Engagement – regional community relations leads, local community relations offices
- Intergovernmental Affairs
- Protocol

OPE has one representative (Community Engagement Officer) at each Service Center, including the National Benefits Center, and one in each District Office

Community Relations Division
- Stakeholders = attorneys, educational institutions, business groups, community/faith-based organizations
- Stakeholder meetings – may stream them online in the future
- Stakeholder feedback on the website

Intergovernmental Affairs (IGA)
- Stakeholders = state legislatures, national associations, elected officials/staff, Federal agencies (DOS), DHS offices/departments (CBP, ICE), SSA, DMV, state/local law enforcement

Protocol
- USCIS-wide engagement on stakeholder issues/outreach
- Plan events – 40 national engagements, over 500 Field Engagements
- Stakeholder meetings, listening sessions
- Posting Memoranda for public comment

FY 2010-2011 Initiatives
- Unauthorized practice of immigration law – building capacity, education, prevention
- Posting Memoranda for comment
- Launch UPIC outreach/capacity building
- Enhance web presence / social media engagement
- Support citizenship and integration outreach efforts
- Support rollout of major USCIS initiatives
- Training for field CROs
- Expand outreach to vulnerable / underserved populations (T, U, VAWA)
- Institutionalize intra-agency coordination mechanism (e.g. DMV issues)

Transformation listening sessions

I-9 Listening Session – 11/09/2010

Visit USCIS website – "Outreach" tab

public.engagement@dhs.gov

Online Citizenship Resource Center – uscis.gov/citizenship

www.uscis.gov/humantrafficking

Link w/ Office of Communications?
- Fact sheets, updates, website

** NCSC scripts are managed by the Customer Service Division

OPE is pursuing outreach with state departments of motor vehicles (DMVs)
- Issue of expiration date on same date as EAD, visa document
- Ad hoc – not regularized communication, meetings
- American Association of Motor Vehicle Administrators – reaching out to them
- SAVE division outreach to DMVs
- Pass on any DMV issues/concerns to USCIS Office of Public Engagement

Tour of TSC Facilities

Background Check Unit
- All applications/petitions go through IBIS review
- Review to resolve any initial hits
- National security team to review individuals/cases (FDNS)
  - With different law enforcement agencies to get verification of issues for an adjudicator

Customer Service

- Handles all SMRT email inquiries (received from NCSC)
- Officer can pull file and try to remedy situation
- NO phone calls handled at TSC
  - All phone inquiries are directed to NCSC

Session: Asylum-Related Adjustment of Status Applications

Common Scenarios that cease relationship
- Principal naturalizes before derivative
- Spouse divorces
- Primary dies → will not be excluding factor soon (given recent legislation)
- Child marries

Medical Examination from Overseas
- Need to have one refiled if not on file
- May ask for parts of the form to be redone, but not necessarily full form each time
- Usually only valid for use for 2 years

Once you file for Asylum, you have 2 years for file for the dependents
- But you have to know where they live/are located so they receive the proper contact from USCIS

If separated but NOT divorced, the derivative is still eligible to adjust status

Fee Waivers
- Seeing higher denials for just 1 petitioner (no family)
  - Fee Waivers were designed for family applicants
  - No determinant for poverty level for 1 individual filing alone

TRIG – cases on hold, Interagency Working Group sets priority for review

Plenary Meeting (Marie Sebrechts, Associate Chief, Outreach, Office of Legislative Affairs)

SRMT – Service Request Management Tool

Mission of OLA:
(1) Inform
(2) Advise

Written and oral responses to Congressional inquiries

3 Branches of OLA HQ

(1) Legislative Affairs
- Briefings, testimony

(2) Operations
- Responds to inquiry from congressional offices
- Tracks trends

(3) Outreach
- Engage/outreach at field level
- Support, communications
- Congressional Liaison Specialists in Field
  - USCIS Service Centers, District offices, Field offices, Asylum Offices

FY 2009 = 290,000 inquiries
- telephone (96,000)
- written (21,000)
- Email (153,000)
- Meetings/Briefings (160)

FY 2011 Initiatives
- Redesign of website
- Reduction of processing times
- Military naturalizations consolidated
- E-Verify
  - 250,000 employers enrolled
  - 800,000 worksites registered
  - 1,400 new employers registered each week
- USCIS Transformation
- USCIS Policy Review
  - Priorities: NCSC, H-1B, AOS, Family adjustment, Refugee/Asylum, I-601, employment authorization/travel documents, Naturalization
- New Permanent Resident Card
- Citizenship Integration Grants – programs to prepare individuals for citizenship

Weekly reports from field liaisons to OLA
- Review trends
- Weekly meetings with USCIS staff, including SCOPS, to talk about issues/concerns received

Session: Basic Forms 101 (Led by Time Pierce, who has also worked at CSC)

8 CFR 299.1 – list of forms
Important to review instructions as it provides significant details of the process

Petition = filed by U.S. relative, employer, etc. (think sponsor)
Application = filed by Alien requesting a benefit

Forms Processed at TSC:
- I-90 – Application to Replace Alien Registration Card
- I-102 – replace I-94 card
  - Can check proof of entry if do not have a photocopy of the lost card, but it is helpful to include copy if you have it
  - Entry stamp in passport also helpful
- I-130 – Petition for Alien Relative
  - U.S. Citizen – can file – spouse, child, unmarried son/daughter over 21, married son/daughter
  - U.S. Citizen under 21 – can file for brother, sister, parent
- I-131 – Application for Travel Document
  - Re-entry permit for LPR/CPR; Advance Parole (I-512)
- I-140 – Immigrant Petition for Alien Worker
  - Does NOT authorize the beneficiary to enter or remain in the U.S.
- I-485 – Application to Register Permanent Residence or Adjust Status
- I-526 – entrepreneurs (filed with CSC)
- I-360 – special immigrants / religious workers
- Asylum applications done at TSC
- I-730 – Refugee / Asylee Relative Petition
  - Spouse or child can be included no matter their age
  - relationship has to exist at time the petitioner filed for refugee/asylee status
- I-751 – Petition to Remove Conditions on Resident (NOT worked at TSC)
- I-765 – Application for Employment Authorization

**ELIMINATE Slide 42 or 44 – "NOT Required to file for EAD" contains errors

Asylees
- Need I-765 to get EAD to work
- I-94 granting status does not confer employment authorization
- After 1 year of residence in the U.S., Asylee can apply to adjust status

I-129F – Alien Fiancee
- Children of Alien Fiancee may be included
- For alien spouse and spouse's children to enter the U.S.

Dallas Lockbox Tour and Meeting – 10/20/2010

Bryan Shrouf --- JP Morgan (based in Chicago)
Meg Fitzgerald – USCIS site team manager

277 F/T + P/T employees (263 F/T, 14 P/T)
3 shifts, 24 hours/day, 5 days/week

Receivables Operations (RO) – cash management

Facility operated by JP Morgan, Treasury Services Operations

Intake Process Only
- Review Fees
- Application accuracy – such as documents required for petition type
    - Signature, form fully completed, boxes checked
- Digitize data
- Does NOT make initial evidence decisions
- USCIS "makes decisions, assists with questions/problems"

Estimated Applications Received Board
- Breakdown by source (USPS, FedEx, UPS) and type of petition
- Noted for the day (record receipts was 14,723 in one day)
    - Monday is highest receipt date (as they don't work on weekends)
- Receipt date is the day they open the mail
    - Anything received by post office on the weekend is opened on Monday)

** REMINDER: New Fees go into effect on 11/23 -- be sure that applications are postmarked by 11/22 **

Opening of Mail
- Staff wears smocks so nothing can go into pockets or clothes, and cameras monitor personnel throughout facility
- If anything (fee check) falls on the floor, they raise their hand to have a supervisor come and pick it up off the floor
- If they get cash with an application, they deposit it and create a check

Application type – identified by address or P.O. Box (e.g. Attn: N-400)

Applications Opened
- Coversheet, color coded – represent sections of an application
- Application prepared for scanning
- Be sure to include A# on photos
- Prefer to NOT have staples, as the most time consuming part is for staff to unstaple the application (though stapling the fee check to the application is OK)

Checks
- No Receipt # available as the check is processed/"cashed" well before a Receipt # is available/assigned
- Not going to be able to change this

Important Information
- NO highlighting or colored paper (does not scan well)
- Better to include a cover letter

What is scanned?

- All items -- including the check and the envelope
- I-140 – the first 45 pages only

Scanning

- Separate cover sheets with barcode to identify parts of the application
- Scanner – OREX scanners/software – JP Morgan has adapted software
- Appears as separate thumbnails assigned to the particular application
- All digital images kept for 6 months
- Transfer data to USCIS daily (to CLAIMS 3 and CLAIMS 4, plus digital depository)

All paper applications shipped out to USCIS within 24 hours by 2-day mail to appropriate Service Center

- NO paper retained by Lockbox
- Transformation Project trying to link digital system

Data Entry

- Views scans – keys in data from images into database
- Critical fields are reviewed and keyed in 2X (2 different people)
- Every data field is entered
- System reviews business process based on data
    - Is everything on application completed, accurate
- All data sent to USCIS daily (CLAIMS 3 +4)
    - Images sent to USCIS image depository

** Do NOT write "C/O" for I-765 applications – there is no C/O line on the I-765 and the Lockbox will NOT type in anything referenced as C/O prior to an actual street address Write "c/o ISSO, 415 South Street, MB 040, Waltham, MA 02454-9110" instead as "415 South Street, ISSO, MB 040, Waltham, MA 02454-9110"

System Review → decision
(1) Accepted
(2) Rejected
(3) Further review / Research
- Cues for different issues (e.g. fee amount, application form, documents needed) that are reviewed by the USCIS site team

Text Message of Proof of Receipt and Receipt Notice generated on the same day
- Goes out via USPS
- Why does it take 2-3 weeks for us to get Receipt Notice
    - Lockbox staff speculated that may be Post Office issue

Time from mail received at Lockbox to Receipt Notice/Text generated?
- 80-90% within 1 business day

- Others longer to resolve issues/review (fee waiver, etc.)
- Receipt Notice date is date the mail is received at the Lockbox
- Fee check bouncing has NOTHING to do with Lockbox
    - Lockbox forwards the application once it confirms the check written is for the correct amount; it takes a few days for the check to clear, and application will already be at the Service Center

File Assembly
- Based on instructions from USCIS (through SCOPS)
- Intake Operations Division of USCIS, in consultation with SCOPS
- Service Center gets electronic notification of manifest of what to expect in the box of files being shipped (paper copy included in box of files)

Staff
- New staff – all of their work quality controlled for first 30 days
- All work reviewed for that 30 day period

USCIS Filing Tips – on USCIS website
- check to see if filing order guidelines is up on the website – advised that they have been recently updated and posted

Boxed Up
- electronic listing/manifest sent to Service Center so they know what to expect in each box they will receive (paper copy also included in the box)
    - box
    - contents -- # of files
    - UPS tracking #
    - Copy of manifest
- Staff double-checks all files included in the box against the manifest to be sure file, name, and type of application is correct

What if there is a special issue or expedite needed, how is this communicated?
- Include a cover letter explaining the situation (e.g. filing multiple applications jointly)

Lockbox Email
- Emails received at HQ
- Refers to the research team at the Lockbox location
- Lockbox notifies HQ of what it finds/action taken, and HQ responds to school/DSO

What causes an Auto-Reject?
- Items that the USCIS staff at the Lockbox cannot review/fix
    - Wrong fee amount
    - No signature

How often do they meet with the Service Centers?

- Regular meetings -- weekly
- Get feedback from the Service Centers
- All Service Centers and SCOPS are included in the meetings/conference calls

TSC Records Center Meeting and Tour – 10/20/2010

Cindy Dean – Asst Center Director for Records
Michael Shimek – Dep. Asst. to the Director (has also worked at NSC)
Larry Thacker -- file sweeps/queries
Fred Montalto – Lockbox review team manager
Janet Clay – Operations
Caroline Mosley – data collection
Pat Stein – case resolution

Since the Lockbox was implemented, Records Center staffing has decreased to ~ 10 USCIS employees and ~100 contractor employees. Previously ~ 30 USCIS employees and ~225 contractor employees

Lockbox
- TSC does not manage the Lockbox (JP Morgan manages)
- They are an agent of the TSC
- Have few USCIS employees onsite at the Lockbox
- Mostly a treasury (processing of funds) operation
- At present no regular TSC – Lockbox communication, meetings

TSC reviews all documents received from the Lockbox
- To verify that what the Lockbox forwarded on to the TSC is supposed to be received by TSC and not another Service Center

April 1, 2011 --- planned addition of more form types to direct mail to the Lockbox

Incoming Mail Operations
- Contractor picks up USPS mail from Lockbox and brings to TSC
- All mail is scanned upon receipt for dangerous materials
- Once security scanned, forwarded on to Incoming Mail Processing Room
- Dedicated PO Box goes directly to data collection
- Also receive separately from FedEX, DHL
- Contracted government agencies – 3rd party carriers – other Service Centers, National Benefits Center, etc.
- TOTAL = 163,000 pieces of mail per month
  - Including mail from Lockbox
  - 117,000 USPS pieces of mail per month
  - 46,000 express mail pieces per month
- Mail open, sorted, date stamped
- Forwarded to Data Collection Section

Data Collection Section
- Application types: I-140 Premium Processing, I-589, EOIR, I-131, I-485, I-290B, I-817
- Contract employees – process visa and money petitions
- $ must be correct before they can key in the case (case rejected manually if $ is incorrect)
- Fees keyed in within 24 hours of receipt
- Research case – be sure of eligibility, all required documents, before keyed in
- Generates notice – notice generated in computer room and mailed out
    o NOT done at data collection person's desk, it is in a separate room
- Key in $, endorse check
- Entire office register is balanced each day and deposited in whole
- CONCERNS
    o making sure receipt notices go out in timely manner
    o biometrics issues

Post-Lockbox Operations
- 1500-2000 cases received from Lockbox daily
- Box has listed on it the # and type of cases
- Each box has a manifest indicating all cases/files contained
- TSC staff reviews each box -- # of applications and proper receipt
    o Remedy/solution if there is an error
- NFTS – National File Tracking System
    o Log into system
    o Put in cabinets in date order – try to process by date received
- Review application – spelling of name, address/zip, correct jurisdiction, G-28 signed, biometrics (signature, photos)
    o Essentially review of Lockbox's work
    o Weekly review of ~75 cases for quality
    o Can update CLAIMS if Lockbox entered an error
- If need other information or something not included in the application, can issue RFE
    o Move to file room to await receipt of needed documents or to await adjudication

File Room Operations
- Processing ~ 10,000 files per day
- Holding ~250,000 in records at current time
- File Control Offices (FCO) – e.g. district offices
- Case types – I-485 Asylum, I-485, I-130, I-765, I-140
- Lots of matching up pieces of A files
- 2 trips per day from File Room to adjudicators at the other TSC building

Records Center
- Contractors Performance Analysis Group

- o Assessment/review of contractors
- o Random sampling
- Records maintenance
  - o Fingerprints / name checks
    - Constant update so ready when visa is available
- toni.anderson@dhs.gov -- emergency attention to a records issue

Case Resolution Unit (Pat Stein)
- Post office non-deliverables ~ 100 per day
  - o Update system – card undeliverable
    - Check AR-11 system to see if can send to new/correct address
    - Keep EAD card on file for 1 year – check quarterly to see if address is updated
    - After 1 year with no new address, destroy card
    - Have about 10,000 cards on file without correct address
- EAD card issues
- Re-mail, bounced checks, refunds
- A# issues
- Visa referral process, lost visas

Secured Mail Delivery
- Can track delivery in USPS system where card is in delivery system
- Certified envelope can be tracked

NCSC → SMRT email → TSC Field (received by Case Resolution Unit)

I-130 submitted from overseas
- Eventually will be sent to TSC
- Most I-130 processed at CSC
- TSC has some low priority cases forwarded by other Service Centers

Fee Refunds
- TSC review
- Forwarded to the Burlington Finance Center for processing

Bounced Checks
- Also forwarded to Burlington Finance Center
- 14 days to rectify

EAD held for 1 year if returned to TSC
Application File is sent to storage
- Should NOT have to wait for the file back from storage to send the EAD card on to the applicant if TSC has the returned card on file

Visa Referral

- Does not require adjudication
- Review if problems with issuance
- Initiate lost visa requests

Outgoing Mail Operations (4 USCIS staff, USCIS supervisor, contractor employees)
- 203,000 outgoing pieces of mail per month
    - 193,000 regular mail per month
    - 10,000 boxes per month
- EAD cards produced in Corbin, Kentucky
- Travel documents (I-512L) produced at TSC
- Outgoing mail (USPS) picked up 2X per day

Immigrant Visa
- TSC processes all IV except those processed in San Francisco, Los Angeles, and Buffalo

E-file I-140 → TSC
    - Non-Asylum based

TSC – Lockbox Communication
- Formal questions/issues/concerns → HQ, SCOPS, Lockbox HQ (not to Lockbox)
- Informal conversations
    - e.g. Lockbox looks at processing systems at TSC when ramping up for new case types, such as I-140