September 2022

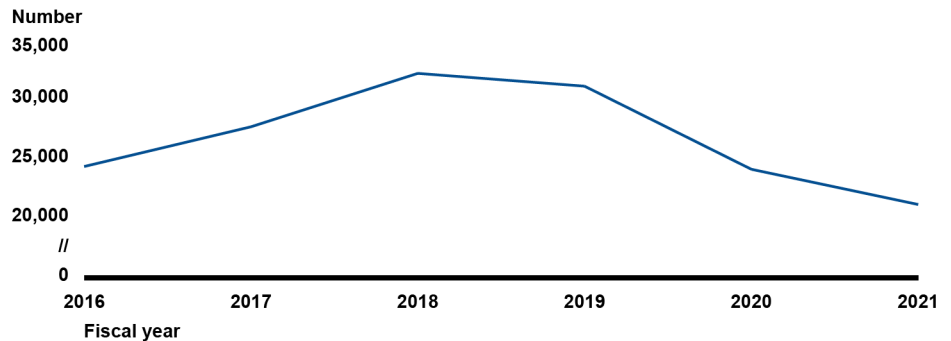# U.S. CITIZENSHIP AND IMMIGRATION SERVICES

Additional Actions Needed to Manage Fraud Risks

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

Additional Actions Needed to Manage Fraud Risks

Why GAO Did This Study

To help ensure the integrity of the immigration system, FDNS develops policies and procedures for detecting benefit fraud, national security, and public safety concerns related to immigration benefit applications. It also conducts administrative investigations in those areas, among other activities. For example, FDNS investigates concerns that the marriages that form the basis of family-based immigration benefits are not bona fide, or that international students are not meeting attendance criteria to maintain their nonimmigrant status.

A 2020 House Appropriations Committee report included a provision for GAO to review USCIS fraud detection operations. This review describes FDNS's workload and evaluates, among other things, USCIS processes to determine staff resource needs; efforts to assess fraud risks and develop an antifraud strategy; and efforts to evaluate the effectiveness and efficiency of antifraud activities. GAO analyzed USCIS documents and data on FDNS operations from fiscal years 2016 through 2021 and interviewed officials.

What GAO Recommends

GAO is making six recommendations to USCIS, including that it identify factors affecting its workload; implement additional data entry guidance; and implement processes to regularly conduct fraud risk assessments, develop an antifraud strategy, and conduct risk-based evaluations of the effectiveness of antifraud activities. DHS concurred with the recommendations.

What GAO Found

Each year, U.S. Citizenship and Immigration Services (USCIS) processes millions of applications and petitions for persons seeking to visit or reside in the U.S. or become citizens. USCIS's Fraud Detection and National Security Directorate (FDNS) leads efforts to combat fraud and detect national security and public safety threats posed by applicants. Each year, FDNS completes thousands of administrative investigations into benefit fraud concerns.

USCIS Fraud Detection and National Security Directorate (FDNS) Fraud Cases Completed, Fiscal Years 2016 through 2021

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

USCIS uses a staffing model to estimate the number of Immigration Officers needed to handle FDNS's projected workload. However, the FDNS staffing model's assumptions do not reflect operating conditions. Also, due to inconsistent data entry practices, the data used in the staffing model do not accurately reflect FDNS staff workloads. Conducting additional analyses to identify factors that affect FDNS's workload and issuing guidance to clarify data entry practices would improve the accuracy of the staffing model's estimates.

USCIS has conducted fraud risk assessments for three immigration benefit types in response to prior GAO recommendations. However, USCIS does not have a process for regularly conducting these assessments because no USCIS entity is responsible for leading them. Implementing a process for conducting fraud risk assessments would help FDNS better understand its fraud risks. In addition, while FDNS has documented some of its antifraud activities, it has not developed an antifraud strategy to guide their design and implementation and the allocation of resources to its highest-risk areas. Implementing a process for developing an antifraud strategy could help FDNS ensure that it has an appropriate balance of antifraud activities to address its fraud risks.

Since fiscal year 2016, USCIS has implemented several changes to its antifraud activities. These changes include adding new activities, modifying ongoing activities, and developing technology tools to support operations. However, FDNS has not evaluated its antifraud activities for efficiency and effectiveness. Implementing a process for risk-based evaluation of antifraud activities would provide FDNS greater assurance that it is effectively preventing, detecting, and responding to potential fraud.

United States Government Accountability Office

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W.
Washington, DC 20548

September 19, 2022

The Honorable Chris Murphy
Chair
The Honorable Shelley Moore Capito
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
United States Senate

The Honorable Lucille Roybal-Allard
Chairwoman
The Honorable Chuck Fleischmann
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
House of Representatives

Each year, the Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS) processes millions of applications and petitions for persons seeking to visit the U.S. for study, work, or other temporary activities; reside in the U.S. on a permanent basis; or become U.S. citizens.[1] To ensure the integrity of the immigration system, USCIS reviews applications and petitions to identify potential fraud, national security, or public safety concerns. USCIS's Fraud Detection and National Security Directorate (FDNS) is tasked with leading efforts to combat fraud, detect national security and public safety threats,

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[1]In general, an immigration "petition" is filed, using the appropriate form, by persons requesting an immigration benefit for themselves or a foreign relative, or by a U.S.-based entity requesting a benefit on behalf of an employee (beneficiary), to establish eligibility for classification as an immigrant with a path to lawful permanent residence, or as a nonimmigrant for an authorized period of stay. For petition-based categories, an approved petition then allows an individual in the U.S. to submit an "application," using the appropriate form, to USCIS for permanent or temporary immigration status. For non-petition categories, a U.S.-located individual may also submit an application for immigration status. An individual located abroad would need a visa application to be approved by the Department of State to authorize them to travel to the U.S. and seek admission at a port of entry under the requested immigration status, whether or not the benefit category is petition based. An immigrant is a foreign national seeking permanent status in the U.S. under 8 U.S.C. ch. 12, subch. II (Immigration); and a nonimmigrant is a foreign national seeking temporary status in the U.S. under one of the classes of nonimmigrants defined in 8 U.S.C. § 1101(a)(15).

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and collaborate with the law enforcement and intelligence communities. For example, FDNS investigates concerns that the marriages that form the basis of family-based immigration benefits are not bona fide, or that international students are not meeting attendance criteria to maintain their status.

We have previously reported on how USCIS has managed fraud risks for certain immigration benefit types.[2] For example, in 2015, we found USCIS had not assessed fraud risks across the asylum process or established clear roles and responsibilities for its staff to detect fraud within the unique features of the asylum system. In 2015 and 2016, we reported on the EB-5 Immigrant Investor Program, including how USCIS's reliance on paper files limited its ability to identify trends and mitigate fraud risks. In 2017, we reported on the refugee program, including how regularly assessing fraud risks could help ensure that fraud detection and prevention efforts are targeted to areas of highest risk. And, in 2019, we reported on benefits to individuals who were the victim of domestic violence by a U.S. citizen or lawful permanent resident, including how improved data analytics could improve fraud detection.

The report of the House Appropriations Committee, incorporated by reference in the Explanatory Statement accompanying the DHS Appropriations Act, 2021, included a provision that we review USCIS's fraud detection operations.[3] Our review examines: (1) what USCIS data indicate about FDNS's workload and how it has changed since fiscal year 2016; (2) the extent to which USCIS has accurately determined its staff resource needs; (3) the extent to which USCIS has assessed fraud risks and developed an antifraud strategy; and (4) the extent to which USCIS

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[2]GAO, *Asylum: Additional Actions Needed to Assess and Address Fraud Risks*, GAO-16-50 (Washington, D.C.: Dec. 2, 2015); GAO*, Immigrant Investor Program: Additional Actions Needed to Better Assess Fraud Risks and Report Economic Benefits*, GAO-15-696 (Washington, D.C.: Aug. 12, 2015); GAO, *Immigrant Investor Program: Progress Made to Detect and Prevent Fraud, but Additional Actions Could Further Agency Efforts*, GAO-16-828 (Washington, D.C.: Sep. 13, 2016) GAO, *Refugees: Actions Needed by State Department and DHS to Further Strengthen Applicant Screening Process and Assess Fraud Risks*, GAO-17-706 (Washington, D.C.: July 31, 2017); GAO, *Immigration Benefits: Additional Actions Needed to Address Fraud Risks in Program for Foreign National Victims of Domestic Abuse*, GAO-19-676 (Washington, D.C.: Sept. 30, 2019).

[3]H.R. Rep. No. 116-458, at 76 (July 20, 2020), incorporated by reference in 2021 Explanatory Statement, 166 Cong. Rec. H8311, H8466 (daily ed. Dec. 21, 2020), accompanying Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 1182 (2020). In response to the same provision of the House Committee Report, we briefed committee staff on the progress of this work in July 2021.

has evaluated the effectiveness and efficiency of FDNS's antifraud activities, including changes to those activities.

To address these objectives, we analyzed FDNS guidance and policy documentation related to antifraud activities, including relevant standard operating procedures and user guides. We also reviewed documents from FDNS headquarters and FDNS units aligned with USCIS's adjudicative directorates, including training materials and productivity reports. In addition, we interviewed officials from FDNS headquarters and several other USCIS directorates and offices, including its Field Operations Directorate; Service Center Operations Directorate; Refugee, Asylum and International Operations Directorate; Office of Performance and Quality (OPQ); and Office of Policy and Strategy (OP&S).

To obtain field perspectives, we interviewed USCIS officials—including Immigration Officers and adjudicators—from 11 field locations.[4] We selected nine offices from among the field locations FDNS has allocated staff. We selected these offices across the three adjudicative directorates based on the size, work volume, work composition, and geographic location of the office. We selected larger offices by staff size and work volume and those with work composition that included a range of immigration benefit fraud types. We also selected two offices with a distinct operational focus to conduct interviews. During these interviews, we discussed topics related to the volume and composition of FDNS's work, staff resources, assessments of fraud risks, and antifraud activities. The information we obtained in these interviews is not generalizable to all USCIS field locations but provides valuable insights from FDNS Immigration Officers and adjudicators.

To address the first objective, we obtained and analyzed USCIS summary-level data on the volume, composition, and time frames FDNS completed various activities for fiscal years 2016 through 2021, the 6 most recent complete fiscal years at the time of our review. We obtained the data from the agency's case management system, known as FDNS Data System (FDNS-DS). Specifically, we analyzed data from FDNS's annual data reports, which represent a snapshot in time captured at the end of each fiscal year. We used data from these reports to describe the volume and composition of benefit fraud leads, benefit fraud cases, site visit activities, requests for assistance, national security and public safety

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[4]Immigration Officers conduct administrative investigations to gather information that an adjudicator can use to make an appropriate decision on an immigration benefit request, either before or after adjudication.

concerns, and social media checks. We also analyzed summary data on time frames to complete various case management activities and total hours FDNS spent on them.

We assessed the reliability of FDNS-DS data by (1) testing for consistency between different data files; (2) reviewing user guides, standard operating procedures, and other documentation related to FDNS-DS; and (3) interviewing and obtaining information from officials on how they collected, used, and assessed the data. We determined the data were sufficiently reliable for the purposes of describing the volume and composition of FDNS's workload and the time frame to complete various operational activities.

To address the second objective, we obtained and analyzed human capital data on USCIS staffing levels for fiscal years 2016 through 2021, the 6 most recent completed fiscal years at the time of our review. We assessed the reliability of these data by reviewing related documentation and interviewing knowledgeable USCIS officials on how they compile and manage the data. We determined the data were sufficiently reliable to compare FDNS's onboard and allocated staffing levels, vacant staffing levels, and vacancy rates by fiscal year.

We also obtained and analyzed data on staffing allocations and workload estimates from USCIS's FDNS staffing models, including productivity measures such as the average hours Immigration Officers spent working on operational activities for fiscal years 2016 through 2021. We assessed the reliability of these data by reviewing related documentation and interviewing knowledgeable USCIS officials about how they use the data. Based on our analysis, we determined that the data for fiscal year 2016 were not comparable to later models.[5]

We evaluated the extent to which FDNS's staffing models adhere to key principles for staffing models. We developed these key principles for staffing models and reported them in prior work, including our 2021 report

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[5]FDNS was responsible for developing its staffing allocation model for fiscal year 2016, however USCIS's Office of Performance and Quality assumed responsibility for it starting with the fiscal year 2017 model and implemented several changes, including how it used historical data to estimate staff resource needs. As a result of those methodological changes, we did not include fiscal year 2016 staffing allocation model estimates in our assessment.

on the staffing models USCIS uses to estimate staff resource needs of its adjudicative directorates.[6]

To address the third objective, we obtained and analyzed USCIS fraud risk assessments, as well as other related documentation, including USCIS's strategic plan and FDNS's annual priorities and objectives for antifraud activities. We also interviewed officials from FDNS headquarters and OP&S about the process for conducting fraud risk assessments, how the process has changed over time, and how the assessments are used to develop USCIS's antifraud strategy. As previously described, we supplemented these interviews with relevant information gathered from interviews with FDNS field officials. We evaluated the extent to which these practices were consistent with leading practices described in our guidance, *A Framework for Managing Fraud Risks in Federal Programs*, for assessing fraud risks and using the information to develop an antifraud strategy.[7]

To address the fourth objective, we obtained and analyzed USCIS documentation about FDNS's policies, procedures, and other guidance to understand how antifraud activities—including the use of technology to support those operations—have changed since fiscal year 2016. We also interviewed FDNS headquarters and field officials to gather information on FDNS's antifraud activities, including how the directorate implemented changes to these activities. We evaluated the extent to which FDNS's process for evaluating and monitoring the effectiveness and efficiency of its antifraud activities is consistent with *A Framework for Managing Fraud Risks in Federal Programs*.[8]

For more details on our scope and methodology, see appendix I.

We conducted this performance audit from July 2021 to September 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain

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[6]GAO, *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload*, GAO-21-529 (Washington, D.C.: Aug. 18, 2021). Also see *DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models*, GAO-13-92 (Washington, D.C.: Dec. 14, 2012); and *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, GAO-10-802R (Washington, D.C.: June 14, 2010).

[7]GAO, *A Framework for Managing Fraud Risks in Federal Programs*, GAO-15-593SP (Washington, D.C.: July 2015).

[8]GAO-15-593SP.

sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

FDNS's Mission, Organization, and Scope of Work

Within USCIS, FDNS is responsible for safeguarding the integrity of the nation's lawful immigration system by leading agency efforts to combat fraud, detect national security and public safety threats, and maximize law enforcement and Intelligence Community partnerships. FDNS (1) conducts administrative investigations into possible acts of benefit fraud and national security and public safety concerns; (2) works with the Office of Policy and Strategy (OP&S) and operational components to develop policies and procedures governing the detection of benefit fraud and national security and public security concerns; and (3) serves as the agency's primary liaison to law enforcement and intelligence partners, among other activities.[9]

FDNS's staff includes Immigration Officers who execute FDNS's operational missions, as well as staff in management, analytical, administrative, and support roles. The majority of FDNS Immigration Officers work in FDNS units within offices aligned to one of the three USCIS directorates that are responsible for processing benefit applications and petitions. Those three directorates, referred to throughout this report as "adjudicative directorates," are: (1) the Field Operations Directorate, (2) the Service Center Operations Directorate, and (3) the Refugee, Asylum and International Operations Directorate. The FDNS units within adjudicative directorate offices report first to the office's leadership and second to local FDNS leadership within the adjudicative directorate.

- The Field Operations Directorate processes applications and petitions for benefits that require interviews—such as those for lawful permanent residence and naturalization—at its 88 field offices, which are overseen by 16 district and four regional offices.

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[9]FDNS Immigration Officers also provide investigatory support to interagency task forces. These include U.S. Immigration and Customs Enforcement (ICE) Document Benefit Fraud Task Forces, which detect and dismantle immigration fraud enterprises, and FBI Joint Terrorism Task Forces, which focus on domestic and international terrorism.

- The Service Center Operations Directorate processes family, employment, and humanitarian petitions that do not require in-person processing or interviews at five service centers nationwide.

- The Refugee, Asylum and International Operations Directorate conducts screenings and processes applications and petitions for noncitizens who can establish they are fleeing oppression, persecution, or torture, or are facing urgent humanitarian situations. It processes affirmative asylum applications at its 11 asylum offices and one asylum suboffice, and conducts credible and reasonable fear screenings across the country.[10] It also conducts refugee processing overseas for applicants who seek resettlement to the U.S.

In addition, some FDNS Immigration Officers are assigned to FDNS Headquarters to carry out investigatory responsibilities at the national level, such as social media checks, discussed in more detail below. FDNS Headquarters also includes other staff who carry out tasks such as developing operational policy and analyzing workload statistics.

Immigration Officers conduct administrative investigations into fraud, national security, and public safety concerns as they relate to immigration benefits. Administrative investigations seek to verify the information provided in an immigration benefit application by gathering evidence that an adjudicator can use to render an appropriate decision for that benefit. Administrative investigation methods include reviewing documents (including the noncitizen's previous immigration benefit applications), searching government databases, interviewing subjects, and conducting site visits.

According to FDNS officials, Immigration Officers primarily receive work in the form of referrals for fraud, national security, or public safety from

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[10]Affirmative asylum applications are filed directly with USCIS by an individual who is in the U.S. and who has generally not been placed in removal proceedings. Individuals apprehended by DHS and placed into expedited removal proceedings are to be removed from the country without a hearing in immigration court unless they express, and receive a positive determination on an intention to apply for asylum or a fear of persecution, torture, or return to their country. Those with such "fear claims" are referred to USCIS for a credible fear screening which may result in a positive determination and referral for review in immigration court, or a negative determination and streamlined removal from the U.S. Individuals who have certain criminal convictions or who have a reinstated order of removal and claim fear are referred for a reasonable fear screening. Under 8 U.S.C. § 1158(b)(3)(C), USCIS also has initial jurisdiction over, and is therefore tasked with adjudicating, any asylum application filed by an unaccompanied child (i.e., a child under 18 years of age who lacks lawful immigration status and has no parent or legal guardian present or available in the U.S. to provide care and physical custody).

USCIS adjudicators, who may identify concerns while reviewing noncitizens' files, conducting adjudicative interviews, or completing data system checks. Other sources of work include standard background checks, as well as information from state, local, and federal law enforcement or other agencies, interagency task forces, and public tips. FDNS may also initiate its own work by identifying new concerns during ongoing investigations. Figure 1 summarizes FDNS's process for conducting administrative investigations.

Figure 1: U.S. Citizenship and Immigration Services (USCIS) Fraud Detection and National Security Directorate's (FDNS) Administrative Investigation Process

Initiation	Processing	Review and investigation	Documentation
FDNS receives information about a potential fraud, national security, or public safety concern related to an immigration benefit request. Sources of information include: U.S. Citizenship and Immigration Services (USCIS) immigration benefit adjudicators, automated notifications in the screening of biographic and biometric information, or law enforcement agencies, among others.	If FDNS determines the information is sufficient to proceed, it will categorize the initiated work depending on the nature of information provided. Possible categories include: (1) fraud, (2) national security, (3) public safety, and (4) overseas verification request, among others.	FDNS conducts research and/or an administrative investigation, as appropriate, about matters related to the initiated work. FDNS's objective is to gather relevant and material evidence that an adjudicator can use to make a decision about an immigration benefit request. Methods may include: database searches, file review, social media research, interviews, and site visits.[a]	FDNS documents the results of its research and/or investigation and provides that information to the immigration benefit adjudicator. FDNS does not recommend adjudicative courses of action. If the immigration benefit adjudicator has a concern or disagrees with the finding, the issue is elevated for discussion and resolution between FDNS and adjudicative directorate supervisors.

Source: GAO analysis of FDNS documentation. | GAO-22-105328

[a]If FDNS identifies evidence of fraud that warrants a criminal investigation, it will refer the matter to U.S. Immigration and Customs Enforcement (ICE) or another law enforcement agency, as appropriate. FDNS defers its administrative investigation until the criminal case is complete. Matters that meet the criteria for referral to ICE or law enforcement include: (1) evidence of a national security concern; (2) attorney, notary, interpreter, or preparer misconduct; or (3) indications of a large-scale immigration benefit fraud scheme, among others. For matters investigated by ICE or law enforcement agencies, FDNS reviews the findings and ensures the information is sufficient for the USCIS immigration benefit adjudicator to make a determination.

FDNS is to record and track its investigative and other activities in its case management system, FDNS-DS. FDNS categorizes its activities in FDNS-DS in eight primary ways:

1. **Benefit fraud leads.** These represent the first investigative step into a fraud concern. If FDNS's initial investigation establishes that a suspicion of fraud is (1) articulable—that is, supported by sufficient evidence, (2) actionable because it falls within FDNS's scope of responsibility, and (3) determinable through further investigation, FDNS is to convert the benefit fraud lead into a benefit fraud case. If

evidence during the initial investigation does not meet those criteria, FDNS will close the lead and return the application for adjudication.[11]

2. **Benefit fraud cases.** These refer to work related to a benefit fraud concern that requires additional investigative steps. FDNS communicates the findings of these cases in a written memo with a determination of "fraud found" or "fraud not found" and then returns the application for adjudication.[12]

3. **National security concerns**. These refer to work to determine whether a benefit requestor has an articulable connection to an activity, individual, or organization that would make them ineligible for an immigration benefit based on national security grounds.[13]

4. **Public safety cases.** These refer to work investigating possible criminal activity that would render a noncitizen removable.

5. **Site visit programs**. These involve FDNS visiting physical locations as part of one of FDNS's structured programs that use in-person observation and on-site interviews to assess whether petitioners and beneficiaries of certain nonimmigrant and immigrant benefits are complying with program requirements, or if there is evidence of fraud requiring further investigation.[14] FDNS conducts site visits in two main programs:[15]

   - The Administrative Site Visit and Verification Program, implemented in 2009, assesses compliance with employment-

[11]In some instances, FDNS will open a benefit fraud lead after the benefit has been adjudicated. If FDNS determines the initial investigation does not meet the criteria for opening a benefit fraud case, it will close the benefit fraud lead but does not return it for adjudication as that has already occurred.

[12]In some instances, FDNS will open a benefit fraud case after the benefit has been adjudicated. If FDNS makes a determination of "fraud not found," it will close the benefit fraud case but does not return it for adjudication as that has already occurred.

[13]See 8 U.S.C. §§ 1182, 1227 for descriptions of national security areas that are grounds for inadmissibility or removal.

[14]Site visit programs are distinct from the visits to residences, places of employment, or businesses that FDNS staff may make to collect evidence as part of an ongoing administrative investigation.

[15]Additionally, FDNS implemented the External Site Visit and Verification Program in 2018, allowing Department of State consular officers to request FDNS site visits to investigate fraud indicators uncovered during the visa process. Because FDNS conducted no more than approximately 520 site visits each year in this program during the time period we reviewed, we focused instead on the Administration Site Visit and Verification Program and the Targeted Site Visit and Verification Program.

based benefit requirements. Under this program, FDNS reviews all religious worker and EB-5 Immigrant Investor Program petitioners and randomly selects petitioners for H-1B and L-1A visas that USCIS has already adjudicated.[16]

- The Targeted Site Visit and Verification Program, implemented in 2017, assigns site visits based on particular areas of fraud risk within employment- and family-based visa programs. FDNS staff use site visits in this program to identify benefit fraud concerns and compliance issues.

6. **Fraud Tipline.** These refer to work associated with the intake and processing of information gathered from USCIS's web-based tip form, used by members of the public to submit fraud concerns. FDNS staff review tips and refer those that warrant further investigation to the relevant FDNS office, where the tips may result in benefit fraud leads or benefit fraud cases.

7. **Requests for assistance.** These refer to work FDNS does to answer questions or provide information or guidance about fraud, national security, or public safety concerns that are not associated with an existing lead or case. FDNS may perform this work in response to inquiries from internal USCIS sources (e.g., adjudicators, FDNS staff in other offices, etc.) or external entities (e.g., ICE, task force members, law enforcement agencies, etc.).

8. **Social media checks.** These refer to research that FDNS Immigration Officers conduct on select applicants using publicly available information on social media sources such as Facebook, Instagram, and Twitter to identify information of interest that is material to an adjudicator's handling of the application or petition. This

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[16]Religious worker visas refers to special immigrant and nonimmigrant visa categories created to address a shortage of domestic religious workers to fill vacancies for religious positions. For the purposes of the benefit type, "religious worker" is defined as: (1) ministers, (2) those who work in a professional capacity in a religious vocation or occupation, and (3) religious workers and those in a religious vocation. EB-5 Immigrant Investor Program refers to an employment-based immigrant visa category aimed at promoting job creation and encouraging capital investment in the U.S. by foreign investors in exchange for lawful permanent residency (green card) and a path to citizenship. H-1B refers to a nonimmigrant benefit type that enables companies in the U.S. to hire foreign workers for work in specialty occupations on a temporary basis. A specialty occupation is defined as one requiring theoretical and practical application of a body of highly specialized knowledge and the attainment of a bachelor's degree or higher (or its equivalent) in the field of specialty. L-1 visas are issued to intracompany transferees who work for an international firm or corporation in a capacity that is executive, managerial, or involves specialized knowledge.

information includes fraud, national security, and public safety concerns or evidence that supports a subject's eligibility claim.

Immigration Benefit Fraud

Immigration benefit fraud is the act of willfully or knowingly misrepresenting material facts to obtain an immigration benefit for which the individual would otherwise be ineligible. Such material misrepresentations may or may not involve a specific intent to deceive, but for FDNS's purposes, that intent is required to make a finding of fraud. Benefit fraud can occur in a number of ways, and is often facilitated by document fraud (e.g., submitting falsified affidavits or making other materially false written statements in an immigration form or supporting document) and identity fraud (i.e., fraudulent use of others' valid documents).[17]

For FDNS staff to make a "finding of fraud" in a benefit fraud case, they must present evidence that would lead an adjudicator to conclude that a benefit filing contains a material misrepresentation or an omission of a material fact. A finding of fraud may relate to a pending immigration benefit request before USCIS or one already adjudicated by USCIS.[18] USCIS may deny a benefit request upon determining that the individual is not eligible for approval by a preponderance of evidence, due to fraud

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[17]Under 8 U.S.C. § 1324c, immigration-related document fraud includes forging, counterfeiting, altering, or falsely making any document, or using, accepting, or receiving such falsified documents in order to satisfy any requirement of, or to obtain a benefit under the Immigration and Nationality Act.

[18]A finding of fraud may also relate to an immigration benefit request adjudicated by or pending adjudication before another agency. For example, the Department of State is responsible for adjudicating visas, while the Department of Labor provides labor certification to USCIS that U.S. workers are insufficient for filling the number or type of positions an employer is offering and that filling those positions with foreign labor will not adversely affect the wages and working conditions of similarly employed U.S. workers.

material to the adjudication process.[19] Fraud in the immigration context may result in various statutory violations.[20]

Applicants and petitioners may act alone to perpetrate fraud, or a third party may prepare and file fraudulent documents, written statements, or supporting details—often in exchange for a fee—with or without the applicant's knowledge or involvement. Third parties include attorneys, form preparers, interpreters, and individuals posing in one of those roles to engage in unauthorized practice of immigration law. Attorney fraud and unauthorized practice of immigration law fraud are often associated with large-scale fraud schemes, in which one or multiple attorneys file fraudulent forms on behalf of hundreds or thousands of applicants or petitioners.

Common types of benefit fraud include:

- **Marriage fraud.** Knowingly entering a marriage for the purpose of evading any provision of immigration law.[21]

- **Family relation fraud.** Falsely claiming a relationship other than marriage—such as a parent-child or sibling relationship—for the purpose of evading any provision of immigration law.

- **Employment fraud.** Willfully misrepresenting material facts related to employment. Such fraud may be perpetrated by beneficiaries—who may misrepresent their qualifications or submit falsified supporting documents to USCIS—or by petitioning employers, who may create fabricated positions, misrepresent their ability to pay the beneficiary, or create shell organizations for the purpose of perpetrating immigration fraud.

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[19]See 8 C.F.R. pts. 103 (subpt. A), 205. USCIS may also revoke approval of a petition, terminate certain types of status, and rescind adjustment to lawful permanent resident status due to fraud, subject to relevant legal criteria.

[20]See, e.g., 18 U.S.C. ch. 47 (fraud and false statements), in particular § 1001 (criminal penalties for false statements and concealment before any U.S. government entity); 18 U.S.C. §§ 1541–1547 (criminal penalties for immigration-related fraud); 18 U.S.C. § 1621 (criminal penalties for perjury); 8 U.S.C. §§ 1182(a)(6)(C)(i), (a)(6)(F), 1227(a)(1)(A), (a)(1)(B), (a)(3)(C)(i) (grounds of removability for fraud or willful misrepresentations), 1324c (civil penalties for immigration-related document fraud and criminal penalties for not disclosing one's role as document preparer).

[21]See 8 U.S.C. § 1325(c).

Fraud Risk Framework

The objective of fraud risk management is to ensure program integrity by continuously and strategically mitigating the likelihood and effects of fraud. Executive branch agency managers are responsible for managing fraud risks and implementing practices for combating those risks.

In 2015, we issued *A Framework for Managing Fraud Risks in Federal Programs* (Fraud Risk Framework), a comprehensive set of leading practices that serves as a guide for combating fraud in a strategic, risk-based manner.[22] The framework describes leading practices for (1) establishing an organizational structure and culture that are conducive to fraud risk management; (2) assessing fraud risks; (3) designing and implementing antifraud activities to prevent and detect potential fraud; and (4) monitoring and evaluating antifraud activities to help ensure they are effectively preventing, detecting, and responding to potential fraud. Office of Management and Budget guidelines, and related agency controls, developed pursuant to the Fraud Reduction and Data Analytics Act of 2015, which remain in effect according to the Payment Integrity Information Act of 2019, incorporate the leading practices of the Fraud Risk Framework.[23] Figure 2 summarizes the Fraud Risk Framework.

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[22]GAO-15-593SP.

[23]The Fraud Reduction and Data Analytics Act of 2015, enacted in June 2016, required the Office of Management and Budget, in consultation with the Comptroller General of the United States, to establish guidelines for federal agencies to establish financial and administrative controls to identify and assess fraud risks and to design and implement antifraud control activities in order to prevent, detect, and respond to fraud, including improper payments. Pub. L. No. 114-186, § 3, 130 Stat. 546, 546-47 (2016). The act further required these guidelines to incorporate the leading practices from the Fraud Risk Framework. Although the Fraud Reduction and Data Analytics Act of 2015 was repealed in March 2020 by the Payment Integrity Information Act of 2019, this 2019 act stated that these guidelines shall remain in effect, and may be periodically modified by the Office of Management and Budget, consulting with GAO, as the Director and Comptroller General deem necessary. Pub. L. No. 116-117, §§ 2(a), 3(a)(4), 134 Stat. 113, –131-133 (2020) (codified at 31 U.S.C. §§ 3321 note, 3357)..

Figure 2: GAO's Fraud Risk Management Framework
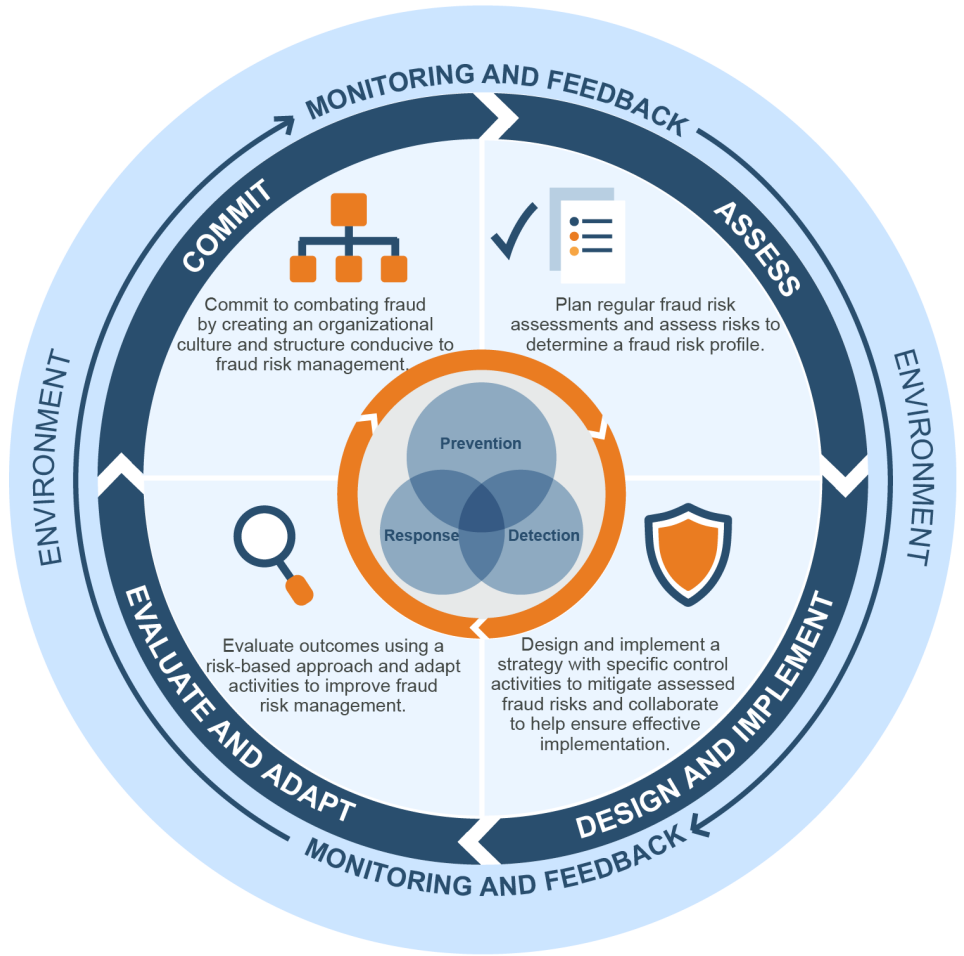
Source: GAO. | GAO-22-105328

FDNS's Workload Has Fluctuated since Fiscal Year 2016

Compared to Fiscal Year 2016, FDNS Processed More Benefit Fraud Leads and Fewer Cases in Fiscal Year 2021

Our analysis of FDNS's data found that in comparison to fiscal year 2016, FDNS processed a larger number of benefit fraud leads but a smaller number of benefit fraud cases in fiscal year 2021. Additionally, while the sources of benefit fraud investigations remained largely consistent, the median time frame between FDNS creating and completing benefit fraud cases more than doubled for cases it closed in fiscal year 2021 compared to those closed in fiscal year 2016.

Benefit Fraud Leads

FDNS processed more benefit fraud leads in fiscal year 2021 compared to fiscal year 2016, and the workload fluctuated between those years. The number of benefit fraud leads FDNS created and completed—that is, closed because further investigation was not necessary—increased from fiscal years 2016 through 2019 and then decreased in fiscal years 2020 and 2021.[24] Compared to fiscal year 2016 work volumes, FDNS created about 35 percent more benefit fraud leads and completed about double the number of leads in fiscal year 2021 (see figure 3).

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[24]FDNS's investigatory work may span multiple years—for example, an Immigration Officer may create a benefit fraud lead or case in one year and complete it in a subsequent year. Additionally, operational activities such as benefit fraud leads and cases may relate to one benefit form filed with USCIS or multiple forms. For example, one benefit fraud case may represent an investigation into a large-scale fraud scheme connected to hundreds or thousands of forms, and such cases may remain open for multiple years.

Figure 3: USCIS Fraud Detection and National Security Directorate (FDNS) Benefit Fraud Leads Created and Completed, Fiscal Years 2016 through 2021
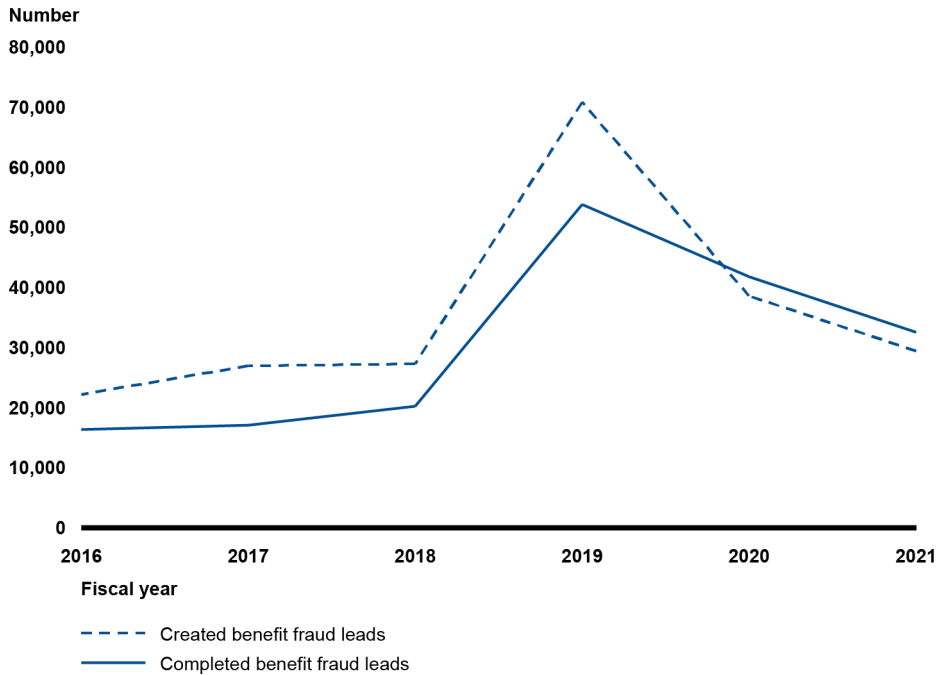
Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: In fiscal years 2018 and 2019, the FDNS Fraud Tipline documented backlogged leads that did not warrant investigation while transitioning to a new tip intake process. According to FDNS officials, that practice contributed to the spike in benefit fraud leads in fiscal year 2019. Benefit fraud leads completed in a fiscal year may have been created in that fiscal year or a prior fiscal year.

The significant increase in benefit fraud leads FDNS created and completed between fiscal years 2018 and 2019 partially resulted from a data entry practice and, according to USCIS officials, does not necessarily reflect an increase in benefit fraud concerns that originated during that time period. Specifically, in fiscal year 2019, FDNS entered tips from the Fraud Tipline that it had not previously recorded in FDNS-DS.[25] According to FDNS officials, the majority of these tips did not contain actionable information; thus, FDNS created benefit fraud leads to document the information, but closed them almost immediately.

The median time frame to close a benefit fraud lead also fluctuated over the time period we examined. Specifically, the median number of days between when FDNS created and closed a benefit fraud lead decreased

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[25]We discuss this data entry practice in more detail later in this report.

from 42 days for leads closed in fiscal year 2016 to less than one day for leads closed in fiscal year 2019, coinciding with the Fraud Tipline data entry practices described above. The median number of days to close a benefit fraud lead increased to 56 days in fiscal year 2020—which FDNS officials attributed to the shift to telework and adjustments to work processes during the COVID-19 pandemic—then decreased to 24 days in fiscal year 2021.

Benefit Fraud Cases

In fiscal year 2021, FDNS created and completed fewer benefit fraud cases compared to fiscal year 2016, and the workload fluctuated between those years. The number of benefit fraud cases FDNS created and completed generally increased from fiscal years 2016 through 2018 and declined from fiscal years 2019 through 2021. Compared to fiscal year 2016, FDNS created approximately 42 percent fewer benefit fraud cases and completed 13 percent fewer cases in fiscal year 2021 (see figure 4).

Figure 4: USCIS Fraud Detection and National Security Directorate (FDNS) Created and Completed Fraud Cases, Fiscal Years 2016 through 2021
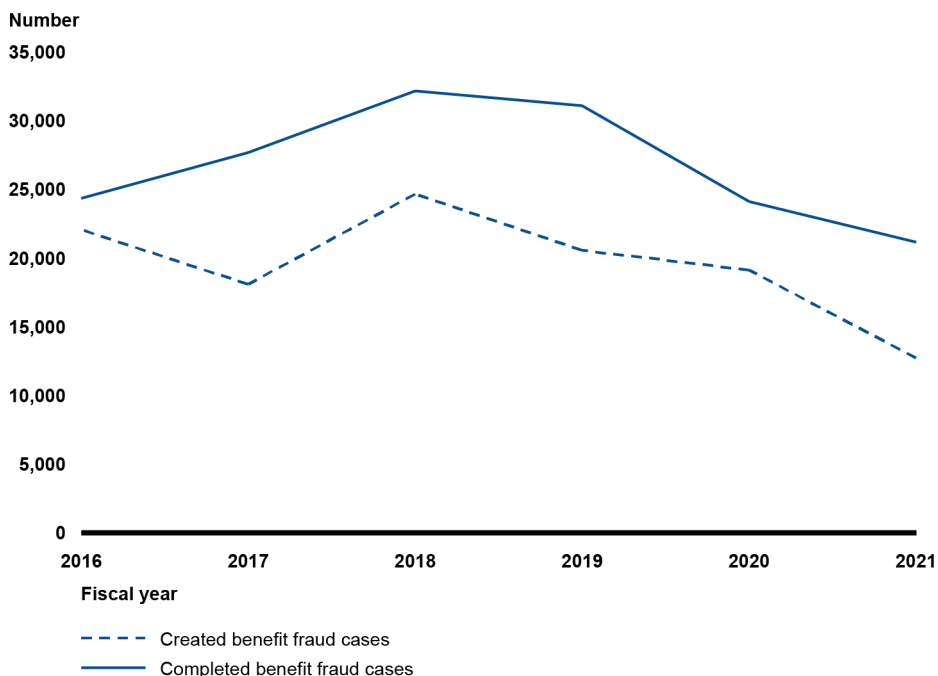
Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Benefit fraud cases completed in a fiscal year may have been created in that fiscal year or a prior fiscal year.

According to FDNS officials, agency-wide financial impacts of the COVID-19 pandemic—including budget constraints, a hiring freeze, high attrition, and limited overtime—negatively affected productivity and led to the decrease in benefit fraud cases in fiscal years 2020 and 2021. Additionally, USCIS restrictions during this time did not allow FDNS to conduct residential site visits as part of benefit fraud investigations. According to FDNS officials, those site visits provide Immigration Officers an opportunity to collect evidence that would be otherwise unattainable, particularly in marriage fraud investigations.[26] From fiscal years 2016 to 2019, FDNS completed between approximately 11,750 and 12,710 site visits for benefit fraud investigations each year.[27] Those site visits decreased to approximately 6,540 in fiscal year 2020 and 5,840 in fiscal year 2021, when USCIS's restrictions only permitted FDNS Immigration Officers to interview applicants and petitioners outdoors—rather than entering the residence—which FDNS officials found to be a less effective fraud detection method.[28]

As the volume of benefit fraud cases generally decreased from fiscal years 2016 through 2021, the median time frame for completing those cases fluctuated before increasing sharply. The median time from creation to closure of a benefit fraud case in fiscal year 2021 was 349 days—more than double the median time for cases closed in fiscal year 2016, which was 161 days. FDNS officials explained that the increase in median completion time was likely the result of reprioritizing work due to COVID-19 restrictions and the associated agency-wide financial impacts. For example, due to USCIS restrictions on residential sites, FDNS Immigration Officers prioritized completing older cases that did not require site visits. See appendix II for additional information on benefit fraud case completion time.

Sources of Benefit Fraud Work

Generally, referrals from USCIS adjudicators were the most common source of FDNS benefit fraud leads and cases. For example, between 54 and 68 percent of benefit fraud cases each year from fiscal years 2016

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[26]Marriage-based immigration benefits require the petitioning U.S. citizen and the noncitizen spouse to demonstrate the validity of their marriage, including by presenting official civil records and residing together, among other factors. FDNS uses residential site visits to collect evidence that may support or disprove the validity of the couple's marriage.

[27]These data include site visits to both residences and places of employment as part of fraud investigations. Additionally, based on our review of FDNS documentation and interviews with FDNS officials, we identified issues with inconsistent data entry and categorization practices. For that reason, we rounded all data points to the nearest ten.

[28]As of March 2022, USCIS removed all restrictions on residential site visits.

through 2021 came from USCIS sources—primarily from adjudicators. Other sources of benefit fraud work each year included (1) the Department of State, (2) system generated notifications, which is an automated FDNS tool that flags fraud, national security, or public safety concerns, and (3) other FDNS staff.

Since fiscal year 2018, USCIS's Fraud Tipline has been the source of thousands of benefit fraud leads each year; however, relatively few of those leads have resulted in benefit fraud cases, as shown in table 1. Specifically, the Fraud Tipline was the source of 31 percent of total benefit fraud leads created from fiscal years 2016 through 2021, but only 3 percent of total benefit fraud cases. According to FDNS officials, it is possible that information from the Tipline that does not result in a benefit fraud case may have future value if, for example, the applicant or petitioner seeks another immigration benefit at a later date. Nevertheless, this pattern indicates that the majority of tips FDNS received—which take time and staff resources to process—did not warrant investigation in the benefit fraud case phase, when FDNS would ultimately identify and convey information that is material to the adjudication of a benefit. However, the Fraud Tipline continued to be the source of a high volume of benefit fraud leads and a comparatively low volume of benefit fraud cases in fiscal years 2020 and 2021.

Table 1: USCIS Fraud Detection and National Security Directorate (FDNS) Benefit Fraud Leads and Cases from the Fraud Tipline, Fiscal Years 2016 through 2021 (Approximate)

Fiscal year	Benefit fraud leads		Benefit fraud cases	
	Created	Completed	Created	Completed
2016	410	350	190	130
2017	740	410	180	120
2018	5,050	4,200	360	200
2019	38,610	32,200	2,290	1,390
2020	12,290	15,370	500	890
2021	10,540	11,260	320	990
Total	**67,640**	**63,790**	**3,840**	**3,720**

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Due to inconsistent data entry and categorization practices in FDNS data, we rounded these data to the nearest ten. The significant increase in benefit fraud leads from the Fraud Tipline in fiscal year 2019 is partially due to a data entry practice in which FDNS entered tips that it had not previously recorded in FDNS-DS. According to FDNS officials, the majority of these tips did not contain actionable information; thus FDNS created benefit fraud leads to document the information, but closed them almost immediately. According to FDNS officials, FDNS largely completed entry of the previously unrecorded tips by the end of fiscal year 2019. Benefit fraud leads and cases completed in a fiscal year may have been created in that fiscal year or a prior fiscal year.

Benefit Fraud Case Investigation Outcomes	The percentage of benefit fraud cases where FDNS found fraud that was material to the application increased slightly from 59 percent of total completed cases in fiscal year 2016 to 64 percent in fiscal year 2021. During the same time period, benefit fraud cases in which FDNS did not find fraud also increased, from 11 percent to 28 percent of total completed cases. The increase in both "fraud found" and "fraud not found" categories was the result of a procedural change FDNS made in fiscal year 2019 that removed the option to close a benefit fraud case investigation with a finding of "inconclusive."[29] See appendix II for additional information on benefit fraud case outcomes.

The Composition of Site Visit Program Activities Has Changed Over Time

The composition of FDNS's site visit work shifted over time from randomly selected compliance reviews to fraud-focused site visits. According to FDNS officials, the shift was made at the direction of USCIS leadership. From fiscal years 2016 through 2019, the number of Administrative Site Visit and Verification Program site visits FDNS completed decreased from approximately 10,360 in fiscal year 2017 to 4,030 in 2019. During the same time period, the number of Targeted Site Visit and Verification Program site visits FDNS completed increased from approximately 100 in fiscal year 2017, when the program was implemented, to 8,510 in 2019. According to FDNS officials, due to the impact of COVID-19 on USCIS's operating environment, FDNS completed fewer total site visits in fiscal years 2020 and 2021. See appendix II for more information on site visit work.

Though FDNS site visit work decreased in volume in fiscal years 2020 and 2021, its median completion times increased. The median time between FDNS creation and closure of an Administrative Site Visit and Verification Program site visit increased from 56 days in fiscal year 2016 to 91 days in fiscal year 2021—an increase of 63 percent. The median time between creation and closure of a Targeted Site Visit and Verification Program site visit increased from 60 days in fiscal year 2017 to 156 days in fiscal year 2021—an increase of 160 percent.

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[29]Based on our review of FDNS-DS summary data, some Immigration Officers continued to close benefit fraud cases with a finding of "inconclusive" through fiscal year 2021, though it decreased as a portion of total completed cases from 27 percent in fiscal year 2016 to one percent in fiscal year 2021. We discuss this procedural change in more detail later in this report.

Annual Requests for Assistance Increased Due to Growing Demand from Other USCIS Directorates

From fiscal years 2016 through 2021, the number of requests for assistance that FDNS Immigration Officers processed increased from approximately 40,130 to 60,480, an increase of 51 percent. Requests for assistance from internal sources—that is, adjudicators or other USCIS directorates, as well as other FDNS personnel—more than doubled from fiscal years 2016 through 2018, driving the increase in overall requests for assistance. Internal requests for assistance may include, for example, an adjudicator asking FDNS staff for guidance on whether a particular document may be fraudulent. According to FDNS officials, if the application is not associated with an ongoing benefit fraud, national security, or public safety investigation, FDNS staff would categorize this activity as an internal request for assistance. Requests for assistance from external sources—such as the FBI, ICE, and interagency task forces—were largely constant during this period (see figure 5).

Figure 5: USCIS Fraud Detection and National Security Directorate (FDNS) Requests for Assistance Created by Source, Fiscal Years 2016 through 2021
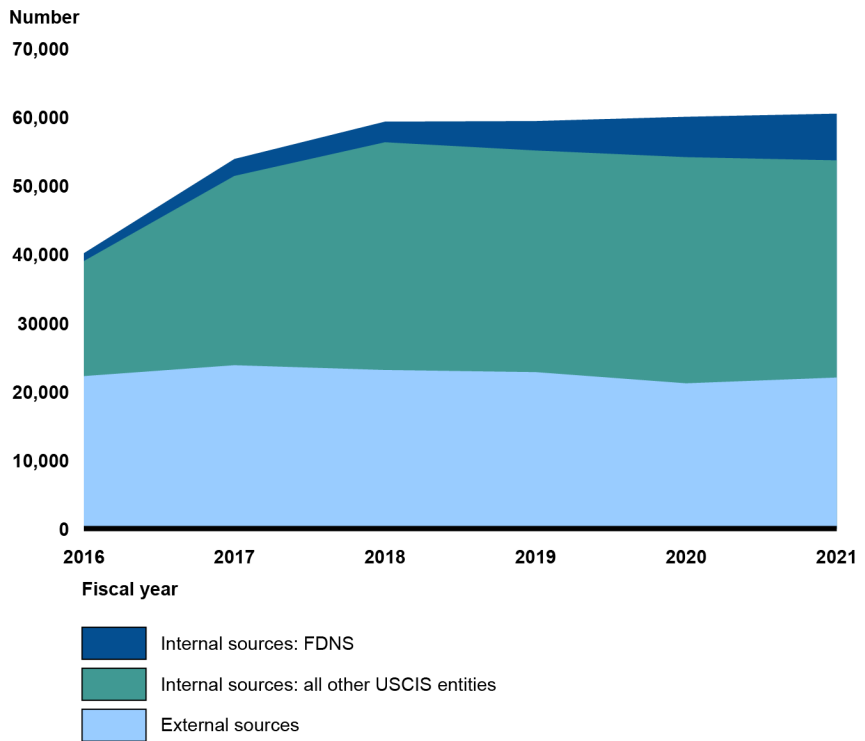
Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Notes: Requests for assistance refers to work FDNS does to answer questions or provide information or guidance about fraud, national security, or public safety concerns that are not associated with an existing lead or case. FDNS performs this work in response to inquiries from internal USCIS sources and external sources. "Internal sources: FDNS" refers to requests for assistance from FDNS Immigration Officers or staff to another FDNS Immigration Officer or unit. "Internal sources: all other USCIS entities" refers to requests for assistance from USCIS staff in other offices or directorates, including adjudicators, to FDNS. "External sources" refers to requests for assistance from entities such as U.S. Immigration and Customs Enforcement, task forces, and state, local, and federal law enforcement agencies to FDNS.

FDNS Immigration Officers may enter data on requests for assistance differently in FDNS's data system. For example, some Immigration Officers we interviewed created individual entries for each request they received, while others created one entry to record all the requests they received in the course of a week. Thus, data on requests for assistance reflect these varying data entry practices.

The Volume of Public Safety and National Security Work Has Fluctuated Since 2016

Public safety cases represent investigations into potential criminal activity that would render an applicant or petitioner ineligible for benefits. Compared to fiscal year 2016, in fiscal year 2021 FDNS staff created 40 percent fewer public safety cases and completed 12 percent fewer. However, during that time period, the volume of public safety work varied year to year, with fiscal year 2020 marked by a steep decrease in volume.

National security concerns represent investigations into an applicant or petitioner's possible association with terrorist activities or organizations, or other national security threats. The volume of national security concerns also fluctuated during the time period we examined, but to a smaller degree than public safety cases. Compared to fiscal year 2016, FDNS staff in fiscal year 2021 created 17 percent more national security concerns and completed 19 percent fewer. See appendix II for additional information on public safety and national security work.

Social Media Checks Have Been Generally Consistent in Volume and the Frequency of Findings of Interest

FDNS conducts social media checks to gather information of interest to adjudicators. Such information could be derogatory—indicating benefit fraud, national security, or public safety concerns—or supportive of the claims an applicant or petitioner made to USCIS while seeking an immigration benefit. When the Social Media Division began its work in fiscal year 2016, FDNS completed approximately 870 social media checks from July through September of that year. During fiscal years 2017 through 2021, the volume of completed social media checks ranged between approximately 9,740 and 13,860 per year. These totals include those conducted by the Social Media Division as well as field checks, which began in fiscal year 2019 and are conducted by Immigration Officers aligned to the adjudicative directorates.[30]

During fiscal years 2017 through 2021, between 1 and 5 percent of social media checks FDNS completed annually identified information of interest. However, the portion of social media checks that identify information of interest varied by reason for conducting the check, from approximately 1 percent to more than 20 percent. For example, though field checks represented a small portion of all social media checks, approximately 23 percent of those checks identified information of interest in fiscal year 2021. See appendix II for additional information on social media work.

FDNS's Distribution of Work Hours Remained Relatively Unchanged

The composition of FDNS's total case management hours remained relatively unchanged during fiscal years 2016 through 2021, with the exceptions of benefit fraud cases and site visit programs.[31] As a percent of total hours FDNS spent on case management activities, the time spent completing benefit fraud leads and requests for assistance remained

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[30]We discuss social media checks in greater detail later in this report.

[31]This analysis of FDNS Immigration Officer work hours focused on time spent on case management activities, such as investigating a benefit fraud lead or conducting site visits. It does not include (1) productive hours spent on other research not directly linked to case management activities and (2) nonproductive hours spent on training or leave.

relatively unchanged from fiscal years 2016 through 2021—though both of those workloads experienced increases in volume over the same time period. In addition, FDNS consistently spent 7 percent of case management hours on public safety and national security work each year despite fluctuations in the volume of those workloads.

From fiscal years 2016 through 2021, the percent of case management hours FDNS spent on benefit fraud cases decreased, consistent with the decrease in volume of benefit fraud cases created and completed during the same time. In fiscal year 2016, FDNS spent 54 percent of total case management hours on benefit fraud cases and in fiscal year 2021 spent 44 percent.

Additionally, during fiscal years 2016 through 2021, FDNS spent an increasing portion of total case management hours on the Targeted Site Visit and Verification Program and a decreasing portion of hours on the Administrative Site Visit and Verification Program. In fiscal year 2017, FDNS spent less than 1 percent of case management hours on Targeted Site Visit and Verification Program site visits and 13 percent of those hours on Administrative Site Visit and Verification Program site visits. By fiscal year 2021, FDNS spent 11 percent of case management hours on the Targeted Site Visit and Verification Program site visits and 7 percent of those hours on Administrative Site Visit and Verification Program site visits.

Figure 6 shows USCIS composition of FDNS case management hours from fiscal years 2016 through 2021.

Figure 6: USCIS Composition of Fraud Detection and National Security Directorate (FDNS) Case Management Hours, Fiscal Years 2016 through 2021

Fiscal year

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

[a]FDNS began implementing Targeted Site Visit and Verification Program partway through fiscal year 2017.

Note: This figure includes the number of hours that FDNS Immigration Officers spent on case management activities. It does not include (1) productive hours spent on other research not directly linked to case management activities and (2) nonproductive hours spent on training or leave.
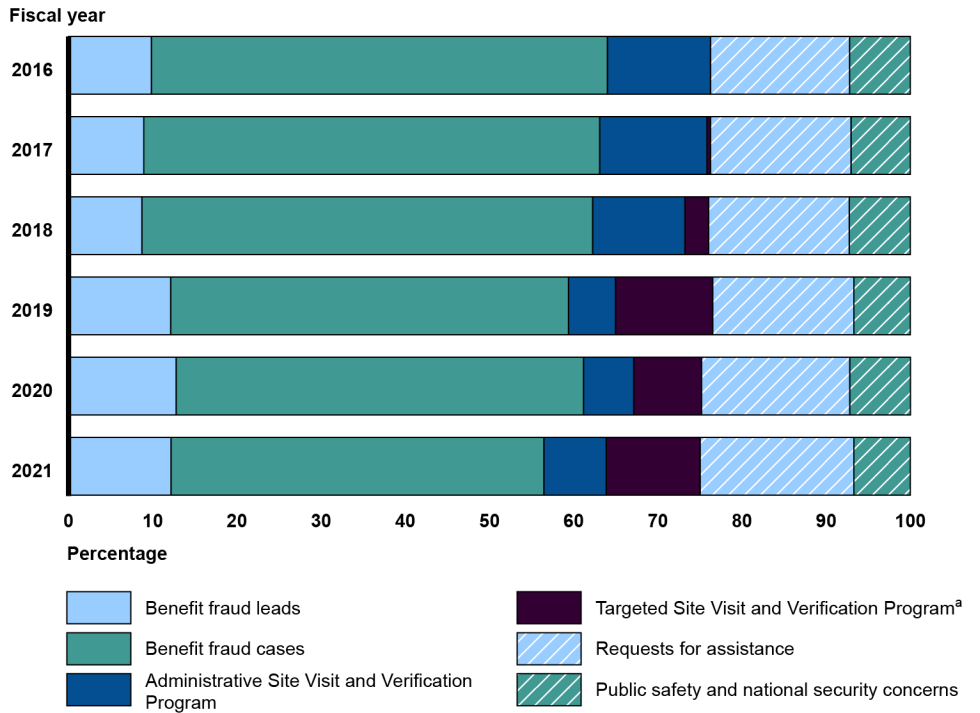
USCIS's FDNS Staffing Model Does Not Fully Incorporate Key Principles for Accurately Determining Staffing Needs

FDNS Staff Resources Increased Significantly Since Fiscal Year 2016

USCIS leadership allocates staff to directorates and other organizational units based on information from the agency's budget, organizational priorities, and staffing models created by its Office of Performance and Quality (OPQ), according to interviews with USCIS officials. Since application fees almost exclusively fund USCIS operations, the agency reviews the expected revenue estimated in its budget for each fiscal year to determine the total number of staff it can support that year. USCIS leadership then reviews the staffing models, which estimate the number of staff needed to complete each directorate's expected workload, and considers its organizational priorities to determine how to allocate staff across the agency. Once leadership allocates staff, the directorates and program offices then determine how to distribute allocated staff within each entity. Figure 7 shows USCIS's FDNS staffing model process.

Figure 7: USCIS Fraud Detection and National Security Directorate (FDNS) Staffing Model Process

| U.S. Citizenship and Immigration Services' (USCIS) Office of Performance and Quality (OPQ) projects future workload estimates using historical data of operational activities completed. | OPQ estimates the number of Immigration Officers and support staff needed to complete future operational activities. | The Chief Financial Officer and Executive Leadership reviews estimated staffing levels. | USCIS allocates FDNS staffing levels. | Directorates determine how to distribute allocated staff within each entity. |

Source: GAO analysis based on interviews with USCIS officials. | GAO-22-105328

Note: Operational activities include FDNS work such as benefit fraud cases, national security concerns, and public safety cases, among others.

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Once allocated, directorates and program offices may then hire staff to fill those allocated positions, but for a variety of reasons, the number of allocated positions may not be the same as the number of staff who are onboard at a given time.[32] For example, hiring delays may result in allocated positions not being filled. Attrition due to resignations or retirements may also result in vacant allocated positions.

The number of staff USCIS allocated to FDNS—including Immigration Officers as well as management, analytical, administrative, and support roles—and the number of staff onboard have increased significantly since fiscal year 2016. Specifically, from fiscal years 2016 through 2021, the number of staff USCIS allocated to FDNS increased by 38 percent, from 1,152 staff to 1,595 staff. Over the same time period, the number of staff onboard increased by 45 percent, from 955 staff to 1,382 staff.

Though the number of onboard FDNS staff in Headquarters and aligned to each of the adjudicative directorates increased from fiscal years 2016 through 2021, each grew at different rates. For example, the number of onboard FDNS staff aligned to the Service Center Operations Directorate increased by 28 percent, while the number of onboard FDNS staff aligned to the Field Operations Directorate increased by 36 percent. Although the Refugee, Asylum and International Operations Directorate had the fewest number of FDNS staff, its number of FDNS staff nearly tripled during this time period. Further, the number of onboard staff in Headquarters staff increased by 55 percent during that period.

Table 2 shows the increase in the number of USCIS FDNS staff onboard by directorate from fiscal year 2016 through 2021.

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[32]For the purposes of this report, "allocated" refers to staff that FDNS leadership has approved funding for; "onboard" refers to hired full-time staff.

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Table 2: Number of USCIS Fraud Detection and National Security Directorate (FDNS) Staff Onboard, Fiscal Years 2016 through 2021

Fiscal year	FDNS Headquarters	Refugee, Asylum and International Operations Directorate	Field Operations Directorate	Service Center Operations Directorate	Total
2016	161	54	553	187	**955**
2017	190	89	605	203	**1,087**
2018	224	120	710	219	**1,273**
2019	263	140	830	244	**1,477**
2020	252	159	843	243	**1,497**
2021	249	140	753	240	**1,382**
Increase 2016 to 2021 (percent)	55%	159%	36%	28%	**45%**

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Immigration Officers account for the majority of FDNS staff and are primarily assigned to FDNS units within offices aligned to one of the three USCIS adjudicative directorates. From fiscal years 2016 through 2021, the number of Immigration Officers onboard increased by 46 percent, from 648 to 943. In fiscal year 2021, 943 of 1,382 FDNS onboard staff were Immigration Officers and almost 90 percent were aligned to one of the three adjudicative directorates.

USCIS's FDNS Staffing Model Met Three of Six Principles of Effective Implementation of Staffing Models

USCIS uses a staffing model to estimate the number of Immigration Officers needed to address FDNS's projected workload. However, it has not fully incorporated key principles of effective implementation of staffing models into its FDNS model.

OPQ projects FDNS's future workload by using data about FDNS's case management activities—for example, the number of benefit fraud leads and cases FDNS completed in previous years—to develop time-series models that predict future years' workloads. OPQ also uses two productivity measures to estimate the number of staff needed to complete FDNS's projected workload. One productivity measure is the completion rate—the average time it takes an FDNS Immigration Officer to complete each type of operational activity. The other productivity measure is the utilization rate—the percentage of time Immigration Officers spend working on operational activities, as opposed to other activities such as training.

With these inputs—future workload estimates, completion rates, and utilization rates—OPQ uses the staffing model to determine the number

of Immigration Officers FDNS would need complete the estimated workload. OPQ collects the data to calculate these inputs, such as completed cases and employee hours, from FDNS-DS, FDNS's case management system where staff record case details and time spent working on each operational activity. Figure 8 summarizes this model.

Figure 8: Inputs in the USCIS Fraud Detection and National Security Directorate (FDNS) Staffing Model

Staff needed
U.S. Citizenship and Immigration Services (USCIS) calculates the FDNS staff resource needs using future workload estimates, completion rates, and utilization rates.

Future workload estimates
Historical data on completed operational activities are used to project future FDNS workload.

Completion rate
The completion rate is the average number of hours it takes an Immigration Officer to complete an operational activity, which are calculated by fraud type.

Utilization rate
The utilization rate is the average percentage of time Immigration Officers spend on productive work hours, rather than nonproductive work hours.

Completed operational activities
Completed operational activities are operational activities—such as benefit fraud leads, benefit fraud cases, national security concerns, public safety cases, among others—that Immigration Officers have investigated and closed.

Employee Hours
Immigration Officers are required to fully account for their time, including productive work hours, such as time spent working on cases, and nonproductive work hours, such as training. Immigration Officers record productive work hours associated with an operational activity in their data management system.

Source: GAO analysis of USCIS data and information. | GAO-22-105328

OPQ reported following this general approach for estimating FDNS staff resource needs for Immigration Officers since the office developed the fiscal year 2017 staffing model, with some recent modifications.[33] According to OPQ officials, OPQ made some changes to how it calculated certain measures when developing the fiscal year 2021 staffing model to improve the accuracy of the model and its estimates. One of

[33]Prior to fiscal year 2017, FDNS was responsible for developing the FDNS staffing model and estimating staff resource needs.

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these changes was calculating the average time to complete benefit fraud leads and benefit fraud cases separately to improve the accuracy of staffing model inputs. According to OPQ officials, these calculations are more accurate because benefit fraud leads typically take less time for Immigration Officers to investigate than cases and may have skewed its data on completion rates in prior fiscal years. For example, in fiscal year 2021, the average completion rate for marriage fraud leads in the Field Operations Directorate was 6 hours, compared to a 26-hour average completion rate for marriage fraud cases.

Additionally, FDNS has made some changes to improve the accuracy of the data it uses. For example, starting in fiscal year 2018, FDNS required Immigration Officers to record all of their hours in FDNS-DS, including productive and nonproductive hours, which improved utilization rate estimates.[34]

Each year, OPQ estimates the number of Immigration Officers FDNS will need for the next fiscal year using historical data to project future workload and calculate Immigration Officers' productivity. According to OPQ officials, the annual staffing model cycle begins in November or December, when OPQ and USCIS directorates meet to discuss major operational or mission changes that may affect productivity. OPQ then works with FDNS's Reports and Analysis Branch, which is responsible for providing OPQ with historical data from FDNS-DS and facilitating the feedback process between OPQ and other directorates. In the spring, OPQ distributes a draft of the staffing model to FDNS leadership for feedback and the final staffing model is delivered to the Chief Financial Officer in July.

Table 3 shows OPQ's estimates of the number of Immigration Officers FDNS needed for fiscal years 2017 through 2021, according to the FDNS staffing models. For fiscal year 2021, OPQ estimated FDNS needed approximately 77 percent more Immigration Officers than it estimated in fiscal year 2017.

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[34]Productive hours refers to time spent working on operational activities. Nonproductive hours refers to time spent on non-operational activities such as training.

Table 3: Number of Estimated USCIS Fraud Detection and National Security Directorate (FDNS) Immigration Officers Needed, according to FDNS Staffing Model, Fiscal Years 2017 through 2021

Fiscal year	FDNS Headquarters	Refugee, Asylum and International Operations Directorate	Field Operations Directorate	Service Center Operations Directorate	Total
2017	3	59	486	161	**709**
2018	16	98	564	178	**856**
2019	32	136	634	180	**982**
2020	42	176	681	174	**1,073**
2021	66	125	781	284	**1,256**

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: USCIS's Office of Performance and Quality assumed responsibility of FDNS's staffing models beginning with the fiscal year 2017 staffing model. The Office of Performance and Quality created the staffing model for each fiscal year the year prior and projected future staff needs using historical data. For example, the office created the staffing model for fiscal year 2021 in fiscal year 2020.

Starting in fiscal year 2021, the staffing model also included estimates of the number of staff needed for management, analyst, administrative, and other positions aligned to FDNS Headquarters. Other staff positions were not calculated using estimates of work and productivity measures in the same way as Immigration Officers. Rather, OPQ used a target ratio of Immigration Officers to non-Immigration Officer staff to determine the number of these other staff positions needed.

We assessed USCIS's FDNS staffing model against relevant key principles identified in our prior work on effective implementation of staffing models.[35] As detailed below, we found that USCIS's processes met three of the six principles, partially met one principle, and did not meet two principles (see table 4).

[35]We identified relevant key principles for staffing models based on our prior work. See: GAO, *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload*, GAO-21-529 (Washington, D.C.: Aug. 18 2021); Federal *Protective Service: Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning*, GAO-16-384 (Washington, D.C.: Mar. 24, 2016); *DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models*, GAO-13-92 (Washington, D.C.: Dec. 14, 2012); and *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, GAO-10-802R (Washington, D.C.: June 14, 2010). See appendix I for more details on our methodology.

Table 4: Assessment of USCIS Implementation of Key Principles for Staffing Models in Its Fraud Detection and National Security Directorate (FDNS) Staffing Model

Key principle	Assessment of FDNS staffing model
1) Incorporate risk factors Incorporate risk factors including attrition and address risks if financial or other constraints do not allow full implementation of the staffing model	**Not met.** The staffing model does not incorporate risk factors such as attrition or resource constraints that may affect full implementation of the model.
2) Incorporate work activities, frequency, and time required to conduct them Incorporate mission, tasks and time it takes to conduct activities, incorporate elements mandated by law or key goals into model design	**Met.** The staffing model incorporates the range of operational work activities FDNS Immigration Officers conduct, as well as two productivity measures—the time required to complete each of those activities and the percentage of total work hours Immigration Officers spend on operational activities. In addition, USCIS accounts for new tasks using informed estimates of resource needs and adjusts those estimates following implementation.
3) Ensure data quality Ensure that the staffing model's assumptions reflect operating conditions; ensure the credibility of data used in the models; and preserve the integrity of data maintained in the models	**Partially met.** The staffing model's assumptions do not reflect operating conditions because USCIS has not been able to identify the factors that affect FDNS's workload. Moreover, due to inconsistent data practices over the fiscal years we assessed, FDNS data used in the staffing model may not accurately reflect workloads or time spent on operational activities. Despite the above concerns about the model's assumptions and data, USCIS has implemented measures to preserve the integrity of the information maintained in the model. For example, USCIS has control activities and processes to review calculations and maintain the information in the model from year to year.
4) Involve key internal stakeholders and establish roles, responsibilities, and training for maintaining the model Ensure staffing model involves key internal stakeholders, roles and responsibilities are established for maintaining the model, and staff responsible for maintaining the model have received training	**Met.** Roles and responsibilities are clearly delineated. USCIS's Office of Performance and Quality manages the staffing model process and works with several FDNS stakeholders, including the Office of the Associate Director and the Reports and Analysis Branch to develop, refine, and interpret the results of the staffing model.
5) Ensure the correct number of staff needed and appropriate mix of skills Use staffing model to determine the number of staff needed and the appropriate mix of skills needed to accomplish the agency mission	**Met.** The staffing model estimates the number of Immigration Officers FDNS needs and uses ratios to determine the needed mix of other staff aligned to the directorate.
6) Inform budget and workforce planning Use staffing model to inform budget planning, prioritization activities, and workforce planning (e.g., long-term strategies for acquiring, developing, and retaining staff)	**Not met.** FDNS officials use the staffing model to guide their annual allocation of staff across FDNS units. However, neither FDNS nor USCIS as a whole uses the staffing model to inform long-term workforce planning.

Source: GAO analysis based on documentation and interviews with U.S. Citizenship and Immigration Services (USCIS) officials. | GAO-22-105328

Note: Based on agency documents and interviews with USCIS officials, we defined "met" as USCIS incorporated the principle into the FDNS staffing model; "partially met" as USCIS incorporated some aspects of the principle into the FDNS staffing model; and "not met" as USCIS did not incorporate the principle into the FDNS staffing model.

USCIS Staffing Models Have Not Incorporated Risk Factors

Key principles for staffing models include incorporating risk factors and addressing risks if constraints do not allow full implementation of the staffing model—that is, if the organization is unable to fill all positions the staffing model projects it needs, the agency may not be able to complete the projected workload for the fiscal year.[36] The FDNS staffing model estimates the number of staff FDNS headquarters and offices aligned to USCIS adjudicative directorates needs to complete the projected workload with several assumptions. These assumptions include that (1) each office has been allocated the number of estimated staff needed, (2) those staff are onboard on the first day of the fiscal year, and (3) the number of onboard staff remains consistent for the entirety of the fiscal year.

Our analysis of USCIS's FDNS staffing model found that it did not incorporate workforce-related risks that occur during the course of the fiscal year, which may constrain FDNS's ability to fill the number of positions the staffing model estimates it needs. For example, FDNS officials stated that FDNS has faced similar workforce-related risks as other USCIS directorates, such as agency funding conditions that limit the number of staff allocated to the directorate, hiring and onboarding delays, and attrition. FDNS officials also discussed challenges with obtaining security clearances for new staff, which they noted has caused additional delays in hiring and onboarding new staff. These constraints prevent FDNS from filling all of the positions the staffing model estimates it will need to complete its projected workload, but the risk factors are not incorporated into the staffing model or otherwise addressed. Additionally, as shown in table 5, FDNS has not filled all of its allocated positions in any year from fiscal years 2016 through 2021.

Table 5: USCIS Fraud Detection and National Security Directorate (FDNS) Staff Resources, Fiscal Years 2016 through 2021

Fiscal Year	2016	2017	2018	2019	2020	2021
Allocated	1,152	1,348	1,557	1,562	1,563	1,595
Onboard	955	1,087	1,273	1,477	1,497	1,382
Vacant	197	261	284	85	66	213
Vacancy Rate	17%	19%	18%	5%	4%	13%

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Data reflect the number of FDNS staff allocated and onboard as of the end of the fiscal year.

[36]We define "full implementation of the staffing model" as the hiring of all the staff estimated to complete the projected workload for the fiscal year.

OPQ has not incorporated workforce-related risk factors in the FDNS staffing model because, according to OPQ officials, the staffing model is not the appropriate tool for addressing those risks. According to OPQ officials, the purpose of the staffing model is to determine the number of staff needed to complete incoming work, such as benefit fraud leads and cases, within the year that the work is received. While this approach may help USCIS determine staff needs for the next fiscal year, accounting for these risks in the staffing model would improve the accuracy of the model's staff resource estimates and allow USCIS to better allocate its staff to meet workload needs.

We have previously reported on USCIS's staffing models. In particular, in August 2021, we found that USCIS's staffing models for its other directorates did not incorporate workforce-related risks because they did not have a methodology to do so.[37] We recommended that USCIS incorporate key workforce-related risk factors into its staffing models to improve the accuracy of its models and allow USCIS to better align its staff with its workload needs. USCIS concurred with the recommendation and, as of June 2022, reported taking some steps to account for workforce-related risk factors in determining its staffing needs. To fully implement our prior recommendation, USCIS should continue to ensure that it incorporates key risk factors, such as risks posed by hiring delays and attrition, into its staffing models, including the FDNS staffing model.

Inconsistent Data Practices Affect the Accuracy of FDNS Staffing Model Resource Estimates

Key principles for staffing models state that organizations should ensure that (1) the staffing model's assumptions reflect operating conditions, (2) data used in the models are credible, and (3) the integrity of the data in the models is preserved. However, we found that the FDNS staffing model's assumptions do not reflect operating conditions and, due to inconsistent data practices over fiscal years 2016 through 2021, the data used do not accurately reflect workloads or time spent on activities.

Assumptions do not reflect operating conditions. USCIS has not identified the factors that affect FDNS's workload and, as a result, the agency relies on projections of future workload that do not reflect operating conditions. As described previously, when developing staffing models for USCIS directorates, OPQ projects future workload and uses productivity measures to estimate the number of staff resources needed to address that workload. OPQ develops workload volumes for staffing

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[37]GAO, *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload,* GAO-21-529 (Washington, D.C.: Aug. 18, 2021).

models for USCIS's adjudicative directorates based on projections of application receipt volumes. These projected receipt volumes are based on trends in case receipts for each adjudicative office and validated by subject matter experts who consider the factors that affect application volumes.

However, neither OPQ, nor FDNS's Reports and Analysis Branch, which is responsible for statistical analyses of FDNS's work, have identified the factors that drive FDNS's workload using statistical analyses. More specifically, FDNS and OPQ officials told us FDNS's workload should logically be correlated with the adjudicative directorates' workload, since referrals from adjudicators comprise a significant portion of FDNS's work. To date, though, OPQ officials said they have not been able to identify a statistical relationship between FDNS's workload and factors such as the number of applications the adjudicative directorates processed or interviews adjudicative directorates completed.

According to OPQ officials, their inability to statistically identify the factors that affect FDNS's workload may be due to the complex nature of FDNS's work process, as well as data issues. For example, FDNS's work originates from multiple sources, including referrals from adjudicative officers, requests or referrals from law enforcement agencies, and system generated notifications. Because there is no single path from application submission to FDNS's workload, modeling that relationship is more challenging than modeling the adjudicative directorates' workloads, according to USCIS officials.

According to FDNS officials, the relationship between adjudicative directorate workloads and FDNS workloads might be statistically weaker than expected because adjudicators may not always make a referral to FDNS when they identify a fraud concern. FDNS officials noted that, based on anecdotal information, this is because some adjudicators perceive the FDNS units as not staffed to sufficiently manage the work. In addition, OPQ officials told us that inconsistent data entry practices affect their ability to accurately model the relationship between adjudicative workload and FDNS workload. For example, some FDNS Immigration Officers link a benefit fraud case to the application that resulted in its referral to FDNS, while others link the case to all of the applications related to that individual.

Nevertheless, FDNS officials—including those from the Reports and Analysis Branch—told us that additional analyses that focus on specific types of operational activities with more easily modeled processes might

be successful. Moreover, FDNS officials agreed that the staffing model would be improved if they could better identify the factors that affect FDNS's workload.

In the absence of information about what factors affect FDNS's workload, OPQ relies on time-series models to estimate future workload based on the volume of work FDNS has completed in previous years. Therefore, as completed work volumes increase, the staffing model will project future increases in workload that require additional staff. As the number of FDNS staff increases and those staff account for their work in FDNS-DS, completed work volumes will also increase, thereby further increasing the staffing model's projected workload and predicted need for more staff. In other words, the staffing model is presently designed to continually predict increasing workload volumes and increasing staff needs.

To avoid what OPQ officials considered unrealistic projections of FDNS's future workload, OPQ officials have adjusted their model to "flatten" future projections. For example, officials adjusted the FDNS staffing model by using an exponential smoothing model—a time series forecasting method that will flatten the data over time by weighing recent data on FDNS workloads more than older data. These adjustments may mitigate some of the effects; however, without identifying the factors that affect FDNS's workload, OPQ cannot ensure the staffing model's assumptions reflect actual operating conditions and, therefore, cannot accurately estimate FDNS's staff resource needs.

Inconsistent data practices. We identified several practices that, when taken collectively, raise questions about the extent to which some of the FDNS-DS data used in the staffing model accurately or credibly reflect FDNS's workload and productivity for the purpose of predicting staff resource needs. These practices include (1) differences in how FDNS staff across offices enter and update data in FDNS-DS, (2) some USCIS directorates' use of data systems other than FDNS-DS to record workload and productivity, and (3) data entry of previously backlogged tips.

- *Differences in data entry.* FDNS staff across USCIS offices track their workload and productivity differently in FDNS-DS, which could affect the staffing model's estimates for each office's resource needs. Based on our interviews with FDNS staff aligned to the three adjudicative directorates, staff have different practices for recording requests for assistance. For example, some staff record each individual request for assistance as an individual entry in FDNS-DS, while other staff create a single entry for all requests they complete that week. Because

activity counts and hours to complete requests for assistance are staffing model inputs, these inconsistent practices affect the model's estimates and FDNS's allocation of staff across those offices.

In another example, FDNS officials in one field office told us that their office has a practice of converting referrals into a case before completing any substantive work if the referral has been open for 90 days, in order to meet one of FDNS's performance measures.[38] This practice has the effect of artificially increasing the number of cases associated with an office and future workload volumes.

According to FDNS officials, inconsistencies with data entry practices across field locations are mitigated because calculations of staffing model data inputs are averaged across locations. However, since USCIS determines staff resource allocations based on historical data of completed cases and productivity measures, inconsistent data entry practices still present a challenge because offices that report more cases completed will appear to need more staff, thus affecting FDNS's ability to accurately allocate staff.

- *Use of other data systems for recording workload and productivity*. USCIS officials told us that some adjudicative directorates have used data systems that were not linked to FDNS-DS to record their work. For example, prior to fiscal year 2018, FDNS staff aligned with the Refugee, Asylum and International Operations Directorate did not consistently use FDNS-DS. As a result, data from FDNS-DS, which USCIS has used to determine staff resource allocations, undercounted those staff members' productivity and annual estimated workload.

  In another example, adjudicators in different directorates use different processes and systems to refer concerns to FDNS. The Field Operations Directorate and the Refugee, Asylum and International Operations Directorate use FDNS-DS to send referrals to FDNS Immigration Officers aligned to their directorate. Meanwhile, adjudicators in the Service Center Operations Directorate use the Computer Linked Application Information Management System, a case management system used to track and adjudicate certain immigration benefit forms filed with USCIS, to notify FDNS Immigration Officers of their referrals. Since the system is not linked to

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[38]One of FDNS's performance measures states that referrals should be reviewed, worked, and converted as a case, if appropriate, within 90 days.

FDNS-DS, FDNS Immigration Officers aligned with the Service Center Operations Directorate must manually enter referrals received from the system into FDNS-DS to record their work. According to FDNS Immigration Officers aligned with the Service Center Operations Directorate, entering work into FDNS-DS is time-consuming and may result in manual data entry errors or delays in entering data. According to OPQ officials, this delayed data entry also affects their ability to identify links between adjudicative and FDNS workloads.

- *Fraud Tipline Data Entry.* As previously discussed, in fiscal year 2019, FDNS staff entered tips from the Fraud Tipline that had not previously been recorded in FDNS-DS. According to FDNS officials, the majority of these tips did not contain actionable information; thus FDNS created benefit fraud leads to document the information, but closed them almost immediately. However, the data entry practice resulted in a significant increase in benefit fraud leads FDNS created and completed in fiscal year 2019, which do not necessarily reflect an increase in benefit fraud concerns that originated during that time period. The practice also reduced the median completion time frame for fraud leads from 9 days in fiscal year 2018 to 0 in fiscal year 2019.

  According to OPQ officials, the data from the Tipline was included when calculating future workload estimates for the fiscal year 2021 staffing model. After developing the fiscal year 2021 staffing model, OPQ officials determined that the data from the tips does not accurately reflect future trends. As a result, OPQ officials have taken steps to adjust their model so that staffing model estimates in fiscal year 2022 and subsequent years do not take the tips in fiscal year 2019 into account when calculating future workload estimates.

FDNS has standard operating procedures for fraud investigations that provide guidance to FDNS Immigration Officers on how to conduct their work and a detailed user guide for its case management system—FDNS-DS—that provides guidance on how FDNS Immigration Officers should record their work. However, FDNS officials from several offices we interviewed described the guidance as ambiguous. For example, FDNS officials from one office said that staff may convert a lead to a case at different points in the investigative process because the guidance is not clear and staff interpret it differently. Similarly, officials from another office said the guidance for documenting a request for assistance is ambiguous. As a result, some FDNS staff document each interaction with an adjudicator as a request for assistance, while others may only record what they consider more significant requests. Due to these ambiguities,

FDNS staff across the agency have followed differing practices for entering certain data and information into FDNS-DS, which are then used as inputs for the directorate's staffing models.

FDNS plans to replace FDNS-DS with a new case management system in fiscal year 2023. According to FDNS officials, this new system is intended to improve the reliability and integrity of FDNS data because it will be easier to navigate and will connect to other USCIS systems, which should help decrease manual data entry and minimize the opportunity for input errors.

Although the replacement of its current case management system is a positive step, until the implementation of the new system, it is not clear to what extent, if at all, this new system will address the data entry issues we identified.[39] In addition, USCIS's existing guidance related to data entry is ambiguous. Without clear guidance on FDNS data entry practices for data used as staffing model inputs, FDNS does not have the assurance that those data and resulting estimates are consistent and reliable.

USCIS Has Not Used Staffing Models to Inform Long-term Workforce Planning

Key principles for staffing models also call for using them to inform strategic workforce planning, such as developing long-term strategies for acquiring, developing, and retaining staff. However, neither USCIS as a whole, nor FDNS, uses the FDNS staffing model to inform long-term strategic workforce planning.

In fiscal year 2021, USCIS began using the FDNS staffing model to produce 7-year estimates of FDNS staffing needs. According to USCIS officials, they intended to provide the agency with a longer-term view of FDNS's staffing needs. However, according to FDNS officials, estimates of work volume for future years are not reliable because the long-term staffing model estimates do not account for changes in laws, regulations, or administrative priorities that may affect FDNS's future workload. Therefore, FDNS only uses the staffing model to inform the allocation of staff across the directorate for the following fiscal year.

In August 2021, we reported that USCIS had developed several strategic and operating plans that include workforce-related goals, but had not

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[39]As of May 2022, FDNS has not implemented NexGen, which will replace FDNS-DS as its case management system.

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developed a strategic workforce plan that includes long-term strategies for acquiring, developing and retaining staff.[40] As a result, we recommended that USCIS develop a long-term strategic workforce plan. USCIS did not concur with the recommendation, stating that it does not believe a long-term workforce plan is necessary and its current workforce planning activities meet its needs.

While specific workforce needs and mission priorities may change from year to year, USCIS has consistently faced long-term workforce challenges and does not have an agency-wide strategy to address them. For example, our August 2021 report discussed agency-wide workforce challenges at USCIS related to attrition, difficulty in hiring to allocated staffing levels, and delays in training and onboarding new staff.[41] As discussed earlier, FDNS faces the same long-term workforce challenges and its onboard staffing levels were consistently lower than allocated levels from fiscal years 2016 through 2021. While developing short-term hiring plans are positive steps, it is important for USCIS to develop long-term workforce goals and strategies to address these long-standing challenges, as we have previously recommended.

USCIS Has Not Regularly Assessed the Risks of Immigration Benefit Fraud to Use as the Basis for an Antifraud Strategy

USCIS Has Conducted Fraud Risk Assessments of Three Types of Immigration Benefits; Does Not Plan to Conduct Additional Assessments

USCIS has conducted fraud risk assessments for a small number of specific immigration benefits, but does not plan to conduct additional assessments. The Fraud Risk Framework calls for an agency's designated antifraud entity to lead fraud risk assessments at regular intervals, and when the program or its operating environment change. According to these leading practices, effective fraud risk assessments generally include: (1) a comprehensive identification of the fraud risks the

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[40]GAO-21-529.

[41]GAO-21-529.

program faces; (2) an assessment of the likelihood and impact of the fraud risks on the program's objectives; (3) a determination of the organization's tolerance for fraud risks in the context of its other operational objectives—for USCIS, effectively and efficiently adjudicating applications; (4) an examination of the effectiveness of existing antifraud activities and a prioritized list of the fraud risks that are not sufficiently addressed; and (5) documentation of the key findings and conclusions in a fraud risk profile for the program.[42]

FDNS, according to its mission, is the designated antifraud entity responsible for leading USCIS's efforts to combat fraud. However, it has not conducted fraud risk assessments at regular intervals or when the operating environment changed. From fiscal years 2016 through 2021, FDNS contributed to—but did not lead—assessments of fraud risks to three benefits types. First, in 2018, USCIS's Immigrant Investor Program Office led an assessment of fraud risks to develop a fraud risk profile for the EB-5 Immigrant Investor Program.[43] Second, in 2021, the Asylum Division conducted a similar assessment and developed a fraud risk profile for affirmative asylum benefits.[44] Third, also in 2021, the FDNS unit aligned to the Service Center Operations Directorate completed an

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[42]GAO-15-593SP.

[43]For more information about managing fraud risks in the EB-5 Immigrant Investor Program, see GAO-15-696 and GAO-16-828. In addition, we are currently conducting a review of the EB-5 program, including the extent to which USCIS has addressed fraud and national security risks. We plan to report the results of our work later this year. The EB-5 statutory framework was extensively amended by the EB-5 Reform and Integrity Act of 2022, enacted as part of the Consolidated Appropriations Act, 2022. Pub. L. No. 117-103, div. BB, 136 Stat. 49, 1070-1109 (classified at 8 U.S.C. § 1153(b)(5), 1186b).

[44]For more information about managing fraud risks in asylum benefits, see GAO-16-50.

analysis of data related to Violence Against Women Act self-petitions as part of a fraud risk assessment effort.[45]

USCIS conducted all three of these assessments in response to recommendations we made about these benefit types. In our previous reports, we identified the lack of a fraud risk assessment as a limitation in USCIS's ability to identify and manage fraud risks for those immigration benefit types. Though assessing the fraud risks for these benefit types is a positive step, the benefit types represent a relatively small portion of the benefits that USCIS adjudicates each year by receipt and completion volume. For example, in fiscal year 2020, Violence Against Women Act self-petitions accounted for less than 0.2 percent of the more than 7 million applications USCIS received and adjudicated.

According to FDNS officials, the directorate has not regularly conducted fraud risk assessments or initiated fraud risk assessments when the operating environment changes because FDNS is not responsible for doing so. According to congressional testimony by a former associate director of FDNS, in 2010 FDNS relinquished responsibility for assessing the type, volume, and indicators of immigration benefit fraud to USCIS's Office of Policy and Strategy (OP&S) because FDNS staff did not have the analytical expertise to conduct the work.[46]

However, according to OP&S officials, the benefit fraud research they conduct is not the equivalent of fraud risk assessments and, as a result, neither OP&S nor FDNS considers leading such assessments its responsibility. Both FDNS and OP&S officials we interviewed agreed the

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[45]For more information about managing fraud risks in Violence Against Women Act self-petition benefits, see GAO-19-676. Violence Against Women Act self-petitions are submitted by noncitizens alleging battery or extreme cruelty committed by a U.S. citizen or lawful permanent resident spouse or parent, or adult U.S. citizen child. The Immigration and Nationality Act, as amended by the Violence Against Women Act of 1994 and subsequent reauthorizations, provides for immigration relief for those noncitizens claiming to have suffered domestic abuse, allowing them to self-petition for classification as an immigrant, and ultimately apply for lawful permanent resident status. Pub. L. No. 82-414, titles I & II, §§ 101, 204, 66 Stat. 163, 166-73, 179-80 (1952), as amended by Violence Against Women Act of 1994, Pub. L. No. 103-322, title IV, 108 Stat. 1796, 1902-55, and subsequent reauthorizations (classified, as amended, at 8 U.S.C. §§ 1101(a)(51), 1154(a)(1)(A), (B)).

[46]*Asylum Fraud: Abusing America's Compassion?* Testimony Before the House Judiciary Committee, Committee on Immigration and Border Security, Testimony of Louis D. Crocetti, Jr., Former Associate Director, Fraud Detection and National Security Directorate, (Serial No. 113-66) February 11, 2014.

transfer of responsibility for conducting fraud risk assessments occurred in 2010, but neither entity has documentation describing the transfer or each entity's current roles and responsibilities for conducting fraud risk assessments.[47] Moreover, as we reported in 2015, following the transfer of responsibility, OP&S refocused its benefit fraud research to limited scope efforts to estimate the fraud rate of a given benefit type, which OP&S officials said were not the equivalent of a fraud risk assessment.[48] As a result, no USCIS entity considers itself responsible for leading fraud risk assessments that would form the basis for the agency's antifraud strategy.

As of March 2022, neither FDNS nor OP&S planned to conduct future fraud risk assessments. Developing and implementing a process for conducting fraud risk assessments and documenting the associated fraud risk profiles for the immigration benefits USCIS is responsible for adjudicating would help FDNS better understand its fraud risk exposure and adopt a more strategic approach to managing fraud risks. A process for conducting fraud risk assessments and documenting the associated fraud risk profiles would include defining roles and responsibilities—including for managing the fraud risk assessment process; the frequency for conducting regular fraud risk assessments as well as the criteria for initiating one because of a change to the operating environment; and how to appropriately tailor the assessment approach so it is consistent with leading practices and yields useful fraud risk profiles. The process would also include a methodology for selecting which immigration benefits or fraud types to assess to ensure a focus on those with the greatest fraud risks.

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[47]From 2005 through 2010, FDNS was responsible for USCIS's Benefit Fraud Assessment program. The program was to measure the integrity of specific immigration benefit types by conducting administrative inquiries on randomly selected cases. As part of this program, FDNS completed several assessments, including one about religious worker benefits and one about a subset of skilled worker benefits. FDNS also initiated an assessment related to asylum fraud in 2009 to determine the relative utility of a number of fraud detection methods and assess the extent to which asylum officers were using the fraud detection measures that were part of the adjudication process at the time. However, FDNS did not release the report because of concerns about the assessment's planning and methodologies. See GAO-16-50.

[48]In 2015, OP&S officials told us the Benefit Fraud Assessment program would be renamed the Immigration Benefit Fraud Assessment program and they would be refocusing their efforts to apply rigorous research methods to provide fraud rates for selected types of immigration benefits. See GAO-16-50.

FDNS Has Not Developed an Agency-wide Antifraud Strategy

FDNS has taken steps to document some of its antifraud activities, but has not developed an antifraud strategy to guide the design and implementation of antifraud activities as well as the allocation of resources to respond to its highest-risk areas. According to the Fraud Risk Framework, organizations that are effective at managing fraud risks use the information from their fraud risk assessments and the resulting profiles to develop and document an antifraud strategy.

An antifraud strategy is to include: (1) the roles and responsibilities of those involved; (2) a description of existing antifraud activities for preventing, detecting, and responding to fraud, as well as the monitoring and evaluation of those activities; (3) the timelines for implementing additional antifraud activities, as appropriate, and monitoring and evaluations of those activities; (4) how antifraud activities are linked to the highest-priority fraud risks outlined in the program's fraud risk profile; and (5) the value and benefits of the antifraud activities so the strategy can be communicated to employees and stakeholders. When developing the antifraud strategy, organizations should consider the costs and benefits of antifraud activities.

FDNS has identified some antifraud activities it implemented or intended to undertake in support of USCIS's agency-wide strategic plans. Since fiscal year 2018, FDNS has produced an annual memo describing targeted activities for its headquarters-aligned units—that is, units not aligned to the three adjudicative directorates.[49] These memos were oriented around a set of priorities derived from USCIS's agency-wide strategic plan. For example, one priority was to identify and mitigate risks to the lawful immigration system. In these memos, FDNS cited several relevant activities including launching a web-based tip form to improve the quality of tips supplied by the public, developing a policy for handling requests for social media checks, and completing various analyses to identify fraud indicators or links between FDNS activities and adjudicative outcomes.

These memos captured some information that might be included in an antifraud strategy, but do not constitute such a strategy. For example, the memos included information on implementing some antifraud activities and identified timelines and a lead unit within the organization that would

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[49]FDNS also produced separate annual memos for units aligned to the three adjudicative directorates for each year of the time period we reviewed. These memos remained largely consistent from year to year and included monitoring measures for field-related activities, which we discuss later in this report.

be responsible. However, the memos did not describe existing antifraud activities to provide a comprehensive view of FDNS's antifraud approach. Further, FDNS did not prioritize the activities in these documents to address the immigration benefit types with the highest risk areas. This is because FDNS has not conducted the necessary fraud risk assessments to identify those areas. As a result, FDNS does not have assurance that its antifraud activities—both existing and planned—address the immigration system's most significant risks.

In addition to helping ensure FDNS has an approach to address the range of fraud risks and appropriately target the most significant risks, an antifraud strategy would help FDNS better communicate its objectives to employees and stakeholders. Similar to other strategic documents, the antifraud strategy called for in our Fraud Risk Framework is an opportunity to draw the links between activities, objectives, and an organization's mission, which in turn drives effectiveness in operations.

Based on our interviews with FDNS officials in headquarters and selected field locations, we found that offices had differing understandings of FDNS's mission, which in turn affected their approach to casework. For example, headquarters FDNS officials from the Office of the Associate Director and the Fraud Division said FDNS's mission was to support adjudicators by determining whether applications contain fraud that is material to the decision to approve or deny a particular benefit. FDNS officials in four of the offices we selected for interviews described a similar understanding of FDNS's mission and stated that they prioritized their work to return applications to adjudicators as quickly as possible. However, FDNS officials in other offices had a different understanding of FDNS's mission. Specifically, FDNS officials in five other offices stated that they viewed FDNS's mission as preventing fraud in order to safeguard the integrity of the immigration system. Consistent with this understanding, these FDNS officials said they were less focused on individual applications, and instead prioritized their work around identifying larger fraud schemes, which were more likely to be criminally prosecuted and serve as a deterrent for future fraud.

Developing and implementing a process for developing and regularly updating an antifraud strategy that is aligned to the agency's fraud risk assessments would help FDNS ensure that it has an appropriate balance of antifraud activities to address its fraud risks. Further, the antifraud strategy would provide a means by which FDNS could communicate to employees and stakeholders a more consistent understanding of the link between antifraud activities and FDNS's objectives and mission.

FDNS Has Not Implemented Processes to Evaluate and Monitor the Effectiveness and Efficiency of its Antifraud Activities

FDNS Implemented Changes to Its Antifraud Activities but Has Not Evaluated the Effectiveness and Efficiency of Its Antifraud Activities

Since 2016, FDNS implemented several changes to its antifraud activities in response to legislation, recommendations we previously made, and other reasons. These changes included the addition of new antifraud activities, modifications of ongoing antifraud activities, and the development of technology tools to support antifraud activities. However, during the time period we examined, FDNS did not evaluate the effectiveness and efficiency of its antifraud activities.

FDNS Has Implemented Several Changes to Its Antifraud Activities since 2016

In response to legislation, recommendations we made in previous reports, as well as other reasons, FDNS implemented several changes to its antifraud activities from fiscal years 2016 through 2021. These changes included the addition of new activities, modifications of ongoing activities, and the development of technology tools to support its operations, as shown in table 6.

Table 6: Selected Changes to USCIS Fraud Detection and National Security Directorate (FDNS) Antifraud Activities, Fiscal Years 2016 through 2021

Antifraud activity (Fiscal year introduced)	Summary of activity
Social Media Checks (2016)	FDNS created the permanent Social Media Division in July 2016 to operationalize social media screenings of certain refugee applicant populations and implement lessons learned from a Department of Homeland Security-led task force on the use of social media for screening and vetting beneficiaries. It created the task force in response to concerns from Congress about the use of social media by terrorist groups.

FDNS created the Social Media Division to develop policies, procedures, and operational structures for FDNS's social media screening and vetting.[a] Social media checks are designed to identify publicly available information of interest in applicants' social media postings that may refute or support a claim made in seeking an immigration benefit. Social Media Division staff conduct social media screenings of selected populations applying for benefits. FDNS staff aligned to adjudicative directorates, who have been trained by the Social Media Division, may also conduct field checks, which are social media screenings done as part of an investigation into a national security, public safety, or fraud concern. These field checks are generally conducted at the request of an adjudicator or other FDNS staff to support an investigation. Approximately 95 percent of social media checks are conducted by Social Media Division staff; the remainder are field checks conducted by FDNS staff aligned to adjudicative directorates. |
| Targeted Site Visit and Verification Program (2017) | FDNS created this program in response to the *Fraud Reduction and Analytics Act of 2015*, which highlighted the need for agencies to establish controls to identify and assess fraud risks and design and implement antifraud control activities.[b]

FDNS piloted and subsequently implemented this program, which focused on a subset of H-1B benefits. FDNS selected the H-1B benefit because FDNS and oversight organizations, including GAO and the Department of Homeland Security Office of the Inspector General, determined it was vulnerable to fraud. Since implementing this program, FDNS has conducted additional pilots to determine whether to include several other benefit types in the program, including I-751, L-1A, L-1B, H-2B, E-2, and CW.[c] As of June 2021, FDNS officials were considering whether to make the L-1A pilot permanent. USCIS is continuing to implement some pilots, while others were delayed due to the COVID-19 pandemic. |
| Benefit Fraud Tipline (2017) | FDNS created new e-mail mailboxes to improve the collection of information from the public about benefit fraud in response to the *Buy American and Hire American Executive Order*.[d]

FDNS created e-mail mailboxes to collect information about fraud and abuse in H-1B and H-2B benefits in 2017. The next year, FDNS allocated staff positions to support that function. Also in 2018, USCIS began publicizing its tip mailboxes to the public on USCIS's website and social media posts. In 2020, FDNS released a web-based tip form for collecting information from the public in place of several of the email-based collection methods. |
| Pre-interview FDNS review (2017) | FDNS developed processes related to pre-interview reviews in response to a recommendation from our previous work and updated guidance to standardize the process in February 2022.[e]

Pre-interview FDNS review involves FDNS Immigration Officers reviewing refugee and asylum applications in advance of the adjudicative interview to identify potential fraud, public safety, and national security issues. According to FDNS Immigration Officers, if they identify fraud concerns during this process, they provide the adjudicator with a summary of the issues and suggested areas to explore during the interview. Pre-interview FDNS review also provides an opportunity for Immigration Officers to identify fraud trends and detect patterns. FDNS does not conduct pre-interview FDNS review on all applications and practices varied across asylum offices until February 2022, when updated guidance standardized the types of cases to be prescreened. |

Antifraud activity (Fiscal year introduced)	Summary of activity
Asylum Text Analytics (2020)	FDNS implemented the Asylum Text Analytics tool in response to a recommendation from our previous work.[f]
	The Asylum Text Analytics tool is a custom-built technology that analyzes asylum applications for similarities in both language and structure, as well as the lawyers, preparers, and translators involved. It is intended to facilitate the identification of trends and fraud schemes across asylum filings nationally.
Standard Operating Procedures: Finding Categories for Benefit Fraud Investigations (2020)	FDNS modified its Fraud Investigation Standard Operating Procedures following an internal quality assurance review.
	Prior to fiscal year 2020, FDNS staff categorized the findings of a benefit fraud case in one of three ways. If the FDNS staff found sufficient evidence of a materially false statement or other material issue involving fraud or misrepresentation, they would return the case for adjudication with a determination of "fraud found." If FDNS staff were able to refute the fraud concern they were investigating, they would return it for adjudication with a determination of "fraud not found." If FDNS staff could not refute or find sufficient evidence of the fraud concern after all available investigative avenues were exhausted, they would return the application for adjudication with an "inconclusive" determination. Following a 2019 internal quality assurance review in which FDNS determined that some staff were disproportionately using the "inconclusive" option, FDNS modified its standard operating procedures to remove "inconclusive" as a possible finding.

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) information. | GAO-22-105328

[a]Social media policies, procedures, and operational structures are subject to compliance with Department of Homeland Security Privacy Policy 110-01, Privacy Policy for Operational Use of Social Media.

[b]The Fraud Reduction and Data Analytics Act of 2015 required the Office of Management and Budget, in consultation with the Comptroller General of the United States, to establish guidelines for federal agencies to establish financial and administrative controls to identify and assess fraud risks and design and implement antifraud control activities in order to prevent, detect, and respond to fraud, including improper payments. Pub. L. No. 114-186, § 3, 130 Stat. 546, 546-547 (2016). Although the Fraud Reduction and Data Analytics Act of 2015 was repealed in March 2020 by the Payment Integrity Information Act of 2019, this 2019 act stated that these guidelines shall remain in effect, and may be periodically modified by the Office of Management and Budget, consulting with GAO, as the Director and Comptroller General deem necessary. Pub. L. No. 116-117, §§ 2(a), 3(a)(4), 134 Stat. 113, 131-133 (2020) (codified at 31 U.S.C. §§ 3321 note, 3357).

[c]I-751 refers to the form used to apply for the removal of conditions on permanent resident status for individuals who obtained conditional permanent residency through marriage. L-1B refers to a nonimmigrant classification that enables a U.S. employer to temporarily transfer a professional employee with specialized knowledge relating to the organization's interests from one of its affiliated foreign offices to one of its offices in the U.S. L-1A nonimmigrant classification enables a foreign company that does not yet have an affiliated U.S. office to send an executive or manager temporarily to help establish a U.S. office. H-2B refers to a nonimmigrant classification that allows U.S. employers or U.S. agents who meet specific regulatory requirements to bring foreign nationals to the U.S. to fill temporary nonagricultural jobs. E-2 refers to a nonimmigrant classification that allows a national of a country with which the U.S. maintains a treaty of commerce and navigation, or with which the U.S. maintains a qualifying international agreement, or which has been deemed a qualifying country by legislation, to be temporarily admitted to the U.S. to direct the operations of a business in which they have invested a substantial amount of capital, or to work in an approved position. CW commonly refers to one of two benefits: CW-1 and CW-2. CW-1 refers to the Commonwealth of the Northern Mariana Islands-Only Transitional Worker classification enabling employers in the Northern Mariana Islands to apply for permission to employ individuals who are otherwise ineligible to work under other nonimmigrant worker categories. The CW-1 classification provides a method for transition from the former the Northern Mariana Islands foreign worker permit system to the U.S. immigration system. CW-2 refers to the classification for dependents of Commonwealth of the Northern Mariana Islands-Only Transitional Worker.

ᵈThe *Buy American and Hire American Executive Order* sought to create higher wages and employment rates for U.S. workers and protect their economic interests by rigorously enforcing and administering immigration laws. It directed the Department of Homeland Security, in coordination with other agencies, to advance policies to help ensure H-1B visas were awarded to the most-skilled or highest-paid beneficiaries. Exec. Order No. 13788, 82 Fed. Reg. 18,837 (Apr. 21, 2017) (issued Apr. 18). Revoked by Reforming Our Incarceration System to Eliminate the Use of Privately Operated Criminal Detention Facilities, Exec. Order No. 14006, 86 Fed. Reg. 7483 (Jan. 29, 2021) (issued Jan. 26).

ᵉGAO, *Asylum: Additional Actions Needed to Assess and Address Fraud Risks*, GAO-16-50 (Washington, D.C.: Dec. 2, 2015).

ᶠGAO-16-50.

FDNS Has Not Evaluated the Effectiveness and Efficiency of Its Antifraud Activities

FDNS has not evaluated its antifraud activities for effectiveness and efficiency, as called for in the Fraud Risk Framework. The Fraud Risk Framework states that periodic evaluations—that is, the systematic and in-depth study of individual antifraud activities to assess their performance and progress toward strategic goals—can provide assurances that antifraud activities are effective and efficient.[50] These leading practices note that evaluations should be risk based, in that they consider identified risks, emerging risks, and internal and external factors that affect the operating environment. Such external factors may include new initiatives, evolving technologies, and attrition or other human capital issues.

The information gathered from these evaluations is critical for making evidence-based decisions about allocating resources and adapting the design and implementation of antifraud activities to improve outcomes. The Fraud Risk Framework also highlights the value of communicating evaluation results to share lessons learned and build support and collaboration for antifraud activities across an organization. As with all aspects of the Fraud Risk Framework, an organization's implementation of the practices should be tailored to align with its activities and with consideration for the associated costs and benefits of implementing those practices.

According to FDNS leadership, FDNS conducts a range of activities in an effort to improve antifraud activities. For example, FDNS monitors operational information on the volume of certain activities and the time frames to complete certain tasks. For two antifraud activities—the Fraud Tipline and the Targeted Site Visit and Verification Program—FDNS collects data about adjudicative actions made after FDNS finds fraud or noncompliance. In addition, for some changes FDNS implemented to its

[50]GAO-15-593SP and GAO, *Designing Evaluations: 2012 Revision,* GAO-12-208G (Washington, D.D.: Jan. 13, 2012).

antifraud activities, FDNS looked at how frequently the new or modified activity identified fraud during a pilot phase.

However, none of the activities FDNS leadership described included systematic and in-depth evaluation of individual antifraud activities to assess their performance and progress toward strategic objectives. Information from such evaluations would enable FDNS to make evidence-based decisions about allocating resources to the activity and adapting its design and implementation. In addition, periodic evaluations would help FDNS communicate the value of those activities, which some FDNS officials have questioned.

Specifically, as detailed below, some FDNS headquarters and field officials we interviewed questioned the effectiveness and efficiency of some antifraud activities, including system generated notifications, social media checks, and the Targeted Site Visit and Verification Program. FDNS regularly reviews operational data about these activities—for example, how many social media checks it conducts and how frequently it identifies information of interest—but does not have a process for evaluating the extent to which these activities and their associated processes are effective and efficient at detecting and addressing fraud.

- **System generated notifications.** Prior to fiscal year 2016, FDNS implemented an automated process to identify certain types of fraud, national security, and public safety concerns for review, referred to as system generated notifications (notifications). Specific events, such as when USCIS receives a benefit request form or an individual's fingerprints, trigger an automated screening process based on criteria established by FDNS. If information in the benefit request form or fingerprints match these criteria, the system will produce a notification and alert FDNS staff that a manual review is required. FDNS staff then review the notification for validity and determine whether it requires further action. One common fraud-related notification alerts FDNS if the applicant's fingerprints indicate that the applicant may have filed other applications or petitions using multiple identities.

  FDNS leadership from the Service Center Operations Directorate and the National Benefits Center—which together triage almost all of these notifications—raised issues with the effectiveness and efficiency of the existing notifications as an antifraud tool because of the number of false-positives they generate. Some notifications detect information that is not easily identifiable through standard operating procedures according to FDNS officials. However, according to FDNS leadership

from the Service Center Operations Directorate, most notifications are not identifying genuine fraud concerns, but rather discrepancies that are generally explained by a legitimate name change—likely due to marriage—or a typo. In addition, according to those officials, most notifications that do relate to a genuine fraud concern are based on information that would have otherwise been revealed through standard procedures.

Based on our analysis of FDNS data, in fiscal year 2021, FDNS determined that more than 80 percent of the approximately 48,000 notifications it reviewed for potential multiple identities that year ultimately required no action.[51] According to the data, notifications may require no action for several reasons. For example, these notifications may have identified information already known to FDNS that did not require additional investigation, or were based on an error in the fingerprint database. In addition to those closed because they required no action, FDNS staff found that another 10 percent of reviewed notifications flagged an issue that was already the subject of an open FDNS investigation.

According to FDNS leaders aligned to the Service Center Operations Directorate, the volume of notifications—particularly relative to the percentage that reveal genuine fraud concerns—has also led them to question the efficiency of these notifications as an antifraud tool because of their effect on time frames for adjudicating the application. Specifically, FDNS's standard operating procedures call for FDNS to clear notifications prior to adjudication, but at the end of fiscal year 2021, FDNS had more than 14,000 multiple identity notifications pending review.

According to FDNS officials, they regularly review operational data about these notifications, but from fiscal years 2016 through 2021, they did not evaluate the effectiveness of the tool for identifying new fraud concerns or the efficiency of the process for triaging the notifications. For example, FDNS officials review data on the number of notifications generated and how many require no action or result in further investigation. According to those officials, FDNS regularly considers adjustments to notification criteria that would reduce the number of alerts that do not correctly identify genuine fraud concerns.

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[51]Notifications are triaged—that is, reviewed, confirmed, and distributed to appropriate points of contact by designated Immigration Officers.

However, FDNS did not conduct an evaluation of their effectiveness or efficiency—for example, whether the notifications were duplicative of other screening and processing practices or the extent to which staff complied with processing guidance. In March 2022, FDNS completed an assessment of these notifications and the processes for reviewing, confirming, and distributing them. Conducting this assessment is a positive step and, according to FDNS officials, provided useful information about the need for additional training.

- **Social media checks.** FDNS officials described similar concerns about the effectiveness and efficiency of social media checks—particularly, field checks conducted by FDNS staff aligned to the adjudicative directorates. Though field checks represent a small portion of all social media checks, FDNS officials from six of the 11 field locations we selected for interviews—including officials from all of the Field Operations Directorate offices we selected—described the process for conducting social media research as resource intensive and inefficient.[52]

  Specifically, to ensure FDNS staff comply with DHS privacy requirements and other policies for collecting and using social media information, FDNS policy requires staff to document the results of each search they conduct, including taking screen shots of all pages they review.[53] According to FDNS officials, these practices—which provide transparency and ensure that each check is auditable—are necessary to remain compliant with DHS's privacy policy and oversight structure requirements. FDNS officials also noted that nearly one in four social media field checks identifies information of interest, which could include derogatory information related to national security, public safety, and benefit fraud concerns, or could refer to information that supports an individual's application or petition.

  FDNS training documentation for conducting social media checks estimated that social media research for one person would take

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[52]Field checks conducted by FDNS staff aligned to adjudicative directorates have accounted for approximately 5 to 7 percent of social media checks conducted annually.

[53]Social media policies, procedures, and operational structures are subject to compliance with DHS Privacy Policy 110-01, Privacy Policy for Operational Use of Social Media. That policy includes Rules of Behavior that set minimum standards for DHS employees' use of social media for operational purposes. FDNS also has standard operating procedures for conducting checks using social media.

approximately 1.5 hours; however, according to some FDNS officials we interviewed who conduct social media field checks, they can take 4 hours or more to complete. According to FDNS officials from the Social Media Division, this may be because field checks may be part of larger investigative efforts, such as fraud schemes involving multiple participants, which are more complicated in nature. The Social Media Division monitors and reports on the timeliness and productivity of staff aligned to the division but not staff who conduct field checks.[54]

FDNS conducted an evaluation in 2017 of the pilot program for conducting social media field checks to inform its expansion of social media checks to the field. Among other factors, the evaluation was to consider how frequently FDNS uncovered otherwise unavailable information that could affect the handling or adjudication of the case. According to the pilot study, all of the evaluation factors were affected by technology limitations and FDNS could not quantify how frequently the social media research revealed otherwise unavailable information, in particular, without revisiting the pilot after those limitations were addressed. Consistent with recommendations from the pilot, FDNS subsequently deployed a new technology that provides managed access to the internet to perform social media checks in a manner that protects USCIS information and systems from intrusion. However, based on our review of FDNS documentation, FDNS has not revisited the evaluation factors from the initial pilot.

According to FDNS officials, they completed a study of the effectiveness of FDNS's social media checks in September 2021. However, as of May 2022, USCIS had not finalized the study and did not intend to take further action to do so. According to FDNS officials, it is difficult to systematically estimate the effectiveness of social media checks, in part because as a matter of policy, DHS does not use social media information as the sole basis to deny an immigration benefit. We recognize the challenges FDNS may face in evaluating this activity, particularly isolating the effect of social media checks. However, such evaluations would provide FDNS with information to make evidence-based decisions about efficiently allocating its

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[54]We discuss the timeliness of social media checks in the context of FDNS's performance measures in the following section of this report.

resources and to communicate the value of social media checks to FDNS staff and stakeholders.

- **Targeted Site Visit and Verification Program.** FDNS officials we interviewed in four field offices raised questions about the effectiveness of the Targeted Site Visit and Verification Program as an antifraud activity. FDNS staff aligned to the Field Office Directorate are responsible for conducting these site visits, analyzing evidence, and making preliminary fraud and compliance determinations.[55] According to these FDNS officials, FDNS might improve the site visit program with more specific criteria for selecting which applications warrant a site visit.

  For site visits focused on H-1B benefits, FDNS selects applications that meet at least one of three criteria it determined were vulnerabilities for the benefit. Once selected, FDNS places applications in a queue and Immigration Officers within the vicinity of the employer conduct site visits from the queue as resources allow. FDNS does not prioritize applications within the queue based on vulnerability or the number of vulnerabilities present.

  FDNS has developed a predictive model to determine if it could more precisely identify fraud indicators in H-1B applications, but has not implemented its use broadly. Specifically, in 2018, FDNS developed a fraud prediction model for H-1B benefits and conducted a pilot to estimate how frequently the 50 applications it selected for site visits using the model resulted in findings of fraud. FDNS conducted a second pilot using 200 applications in 2019. FDNS officials said the pilots were successful and plan to continue refining the model. However, as of April 2022, officials did not have plans for conducting additional pilots or permanently implementing the model because of their focus on other priorities.

  FDNS has some activities in place to monitor site visit program operations and has assessed the results of some of the site visit pilots it initiated, but it has not evaluated the effectiveness and efficiency of the Targeted Site Visit and Verification Program as an antifraud tool,

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[55]FDNS staff aligned to the Service Center Operations Directorate office that is responsible for adjudicating the benefit make the final determination and coordinate with the adjudicator to ensure they have all relevant and necessary information.

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generally.[56] For example, in fiscal year 2017, FDNS started collecting data about adjudicative actions after a site visit reveals fraud or noncompliance. It has also assessed some of the site visit pilots it has initiated.[57]

While the data in these reports provide useful information, such as how frequently FDNS found fraud and noncompliance, they did not include an assessment of the cost of this resource-intensive antifraud activity. Such an assessment would allow FDNS to make evidence-based decisions about whether and how to allocate its limited resources to the program. This information would also benefit FDNS's broader decision-making about the role of the Targeted Site Visit and Verification Program relative to other antifraud activities.

Based on our review of FDNS documentation and interviews with FDNS and other officials, data issues could also pose a challenge to efforts to evaluate the effectiveness and efficiency of antifraud activities. According to the Fraud Risk Framework, evaluating antifraud activities includes understanding the inputs, processes, outputs, and outcomes for achieving the organization's antifraud objectives. FDNS, OP&S, and OPQ officials have described challenges identifying relevant and reliable data and linking antifraud activities to outcomes. For example, one OP&S report noted that varying FDNS-DS data entry practices among immigration officers limited the ability of OP&S staff to search and identify patterns in the data. In addition, OPQ officials described difficulties linking FDNS's data about antifraud activities and adjudicative outcomes because they are stored in separate data systems. As previously noted, FDNS plans to implement a new data system in fiscal year 2023 to electronically link to USCIS's adjudicative systems. However, the Fraud Risk Framework states that organizations should still conduct evaluations of their antifraud activities even if sufficient data may be difficult to collect and recommends evaluating practices or antifraud activities against relevant leading practices.

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[56]As previously discussed, FDNS has conducted pilots of the Targeted Site Visit and Verification Program to determine whether to include several other benefit types in the program, including H-1B, I-751, L-1A, L-1B, H-2B, E-2, and CW. USCIS is continuing to implement some these pilots, while others have been delayed due to the COVID-19 pandemic.

[57]FDNS issued reports about its prediction model and pilots to determine if it should expand the site visit program to include L-1A, L-1B, and E-2 benefit types.

As USCIS's antifraud entity, FDNS is responsible for designing and overseeing fraud risk management activities, including evaluations of the effectiveness and efficiency of those activities. Developing and implementing a process—including clearly defining roles and responsibilities—for risk-based evaluation of the effectiveness and efficiency of its antifraud activities would provide it greater assurance that it is effectively preventing, detecting, and responding to potential fraud. Though these evaluations require an investment of resources to implement, the information they yield would help FDNS better ensure it is allocating its staff and other resources to the most effective activities. Specifically, the information from those efforts would allow FDNS to make evidence-based decisions about what activities are no longer cost-effective or which should be adapted to improve results.

FDNS's Performance Measures Do Not Provide Information on Effectiveness and Efficiency of Antifraud Activities

FDNS monitors its operations via several performance measures, but these measures do not provide information on the effectiveness or efficiency of specific antifraud activities. According to the Fraud Risk Framework, organizations that are effective at managing fraud risks conduct ongoing risk-based monitoring that is focused on measuring the outcomes of their antifraud activities. These ongoing monitoring efforts, by their nature, can serve as an early warning for managers to help identify and promptly resolve issues through corrective actions. Moreover, monitoring enables managers to respond quickly to emerging risks, such as new fraud schemes. These activities are in addition to the periodic in-depth evaluations previously described.

As shown in table 7, in fiscal year 2021, FDNS monitored eight performance measures related to its antifraud activities.

Table 7: USCIS Fraud Detection and National Security Directorate (FDNS) Fraud-related Performance Measures and Targets, Fiscal Year 2021

	Performance Measure	Target
1.	Percentage of applications for citizenship and immigration benefits not approved following a potential finding of fraud	90 percent
2.	Percentage of fraud referrals from adjudicative directorates that are closed or converted into fraud cases within 90 calendar days	80 percent
3.	Percentage of Requests for Assistance from law enforcement agencies that are completed within 30 days of receipt	90 percent
4.	Percentage of multiple identity system generated notifications with pending forms reviewed within 60 days	80 percent
5.	Complete at least 2,000 Administrative Site Visit and Verification Program site visits	2,000 site visits
6.	Complete at least 5,500 Targeted Site Visit and Verification Program site visits	5,500 site visits
7.	Complete all Administrative Site Visit and Verification Program Compliance Review Reports for Pre-adjudication cases within 75 calendar days from field assignment	90 percent
8.	Percentage of "Fraud Found" Statements of Fact that have a TECS record created for an associated subject or organization[a]	90 percent

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) information. | GAO-22-105328

[a]TECS refers to an information-sharing platform. The platform allows users to access different databases and a system of records that include temporary and permanent enforcement, inspection, and operational records relevant to the anti-terrorism and law enforcement mission of U.S. Customs and Border Protection and numerous other federal agencies, including USCIS. One of the final steps in closing a benefit fraud case where FDNS finds fraud is to create a TECS record for the individual or organization.

In addition to these measures, some entities within FDNS monitor other measures for the purpose of managing their own operations. For example, FDNS's Social Media Division monitors time frames to complete certain social media research tasks. The FDNS unit we interviewed at one service center has also established and monitors time frames to complete certain tasks.

While these measures provide some information on program activity and operations, none of them provide outcome-oriented metrics. For example, its measure on the percentage of applications for immigration benefits not approved following a potential finding of fraud can provide information on the immigration system's overall integrity by quantifying USCIS's efforts to keep immigration benefits from being fraudulently acquired. The remaining measures provide FDNS data to manage its workflow by incentivizing completing certain activities within certain time frames. However, such metrics do not allow FDNS to monitor the effectiveness of particular antifraud activities, identify and resolve issues, or respond to emerging risks, as called for in the Fraud Risk Framework.

According to FDNS officials, the measures are sufficient for monitoring the program's progress and performance managing fraud risks. While we agree these measures provide FDNS information on program activities and operations, they provide limited information for managing fraud risks. We also recognize that developing outcome-oriented monitoring measures may be difficult for a variety of reasons, particularly in the context of managing fraud risks. For example, it may be difficult to measure the performance of individual antifraud activities because the activity is one in a system or process. In addition, because of the deceptive nature of fraud, it may be difficult to measure fraud in a reliable way, which can affect an organization's ability to establish baselines and measure outcomes.

That said, an organization's approach to developing performance measures and addressing these challenges will vary based on its circumstances. For example, our Fraud Risk Framework notes that when agencies face challenges measuring long-term outcomes of antifraud activities in a reliable way, managers may supplement those efforts with short- or intermediate-term outcomes, such as the number of potential fraud patterns identified using a particular activity.[58]

Given the adjudicators' role in identifying and referring fraud concerns, FDNS could consider monitoring measures related to the percentage of those referrals that it accepts and that it finds meet the standards for opening a benefit fraud case. In fiscal year 2021, adjudicators referred more than 25 percent of benefit fraud leads. Monitoring the quality of those leads and adjudicators' ability to identify articulable, actionable, and determinable fraud concerns could serve as indicators of training needs or best practices. They could also serve as the basis for identifying and communicating emerging fraud schemes and lessons learned. More broadly, developing outcome-oriented performance metrics, including baselines and targets as appropriate, to monitor the effectiveness of its antifraud activities would help FDNS determine whether its antifraud activities are achieving its goals.

Conclusions

Since fiscal year 2016, the composition of FDNS's workload has fluctuated and its staff resources increased significantly. However, USCIS's process for estimating FDNS's staff resource needs is not fully consistent with leading practices, which may affect its ability to accurately estimate future staff needs. Specifically, the staffing model for FDNS does

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[58]GAO-15-593SP.

not reflect actual operating conditions, and inconsistent data entry practices raise questions about the extent to which some of the data used in the staffing model accurately or credibly reflect FDNS's workload and productivity. Though USCIS has taken some steps to mitigate the effects of these issues on the staffing model's estimates, additional analyses to better understand the factors that drive FDNS's workload and clarifications to its data entry guidance would improve the accuracy of the staffing model's estimates.

In addition, similar to our previous work that assessed the staffing models USCIS created for the adjudicative directorates, the model for FDNS does not incorporate risk factors and FDNS has not used it to inform its long-term workforce planning strategies. In our 2021 report, we recommended that USCIS incorporate risk factors into the staffing models and develop a long-term workforce plan. We continue to believe that taking these steps will improve USCIS's staffing models and better position USCIS to address its long-term workforce challenges.

Further, by taking a more strategic and risk-based approach to managing fraud risks, FDNS could better ensure its antifraud efforts are effective and efficient. This approach would include developing and implementing processes with clearly defined roles and responsibilities for conducting regular fraud risk assessments and documenting fraud risk profiles, developing an antifraud strategy for the agency, and assessing antifraud activities through periodic evaluations and ongoing monitoring of performance measures.

Developing and implementing these processes would allow FDNS to prioritize which fraud risks to address and align its antifraud activities with those priorities. Moreover, the combination of periodic risk-based evaluations and ongoing monitoring of outcome oriented performance metrics would provide FDNS with the information it needs to make evidence-based decisions about allocating resources and adapting the design and implementation of antifraud activities to improve their performance. While this represents a different approach to managing fraud risks at USCIS and will have resource implications, taking these steps, appropriately tailored to USCIS's operating conditions, will better position the agency to implement its missions, including helping to ensure the integrity of the immigration system.

Recommendations for Executive Action

We are making the following six recommendations to USCIS:

The Director of USCIS should identify the factors that affect FDNS's workload to ensure the staffing model's assumptions reflect operating conditions. (Recommendation 1)

The Director of USCIS should develop and implement additional guidance on FDNS data entry practices for fields used as staffing model inputs to ensure consistency and produce quality and reliable data. (Recommendation 2)

The Director of USCIS should develop and implement a process—including clearly defining roles and responsibilities—for regularly conducting fraud risk assessments and documenting fraud risk profiles for the immigration benefits USCIS is responsible for adjudicating. (Recommendation 3)

The Director of USCIS should develop and implement a process for developing and regularly updating an antifraud strategy that is aligned to the agency's fraud risk assessments. (Recommendation 4)

The Director of USCIS should develop and implement a process—including clearly defining roles and responsibilities—for risk-based evaluation of the effectiveness and efficiency of antifraud activities. (Recommendation 5)

The Director of USCIS should develop outcome-oriented performance metrics, including baselines and targets as appropriate, to monitor the effectiveness of its antifraud activities. (Recommendation 6)

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided comments, which are reproduced in full in appendix III. DHS also provided technical comments, which we incorporated as appropriate.

DHS concurred with each of our six recommendations and described planned actions to address them. For example, USCIS plans to conduct additional analyses to explore the factors that drive FDNS's workload to help inform its staffing allocation model. In addition, USCIS plans to implement a process for regularly conducting fraud risk assessments that incorporates a risk-based method for prioritizing those assessments. These actions, if fully implemented as described, should address the intent of our recommendations and better position USCIS to manage fraud risks to the immigration system.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, this report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-8777 or gamblerr@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

Rebecca Gambler
Director, Homeland Security and Justice

Appendix I: Objectives, Scope, and Methodology

This report examines: (1) what U.S. Citizenship and Immigration Services's (USCIS) data indicate about the Fraud Detection and National Security Directorate's (FDNS) workload and how it has changed since fiscal year 2016; (2) the extent to which USCIS has accurately determined its staff resource needs; (3) the extent to which USCIS has assessed fraud risks and developed an antifraud strategy; and (4) the extent to which USCIS has evaluated the effectiveness and efficiency of FDNS's antifraud activities, including changes to those activities.

To address these objectives, we analyzed FDNS guidance and policy documentation related to antifraud activities, including relevant standard operating procedures and user guides. We also reviewed documents from FDNS headquarters and FDNS offices aligned with USCIS's adjudicative directorates, including training materials, productivity reports, and guidance related to process changes implemented in response to COVID-19 and its impact on USCIS's operations.

In addition, we interviewed officials from organizational entities from FDNS headquarters as well as other USCIS directorates and offices. Specifically, we interviewed officials from FDNS's Office of the Associate Director, Fraud Division, Reports and Analysis Branch, National Security and Public Safety Division, Social Media Division, and Systems Integration Division. We also interviewed officials from USCIS's Field Operations Directorate; Service Center Operations Directorate; Refugee, Asylum and International Operations Directorate; Office of Performance and Quality (OPQ); and Office of Policy and Strategy (OP&S).

To obtain field-level perspectives, we interviewed FDNS officials—including Immigration Officers—as well as adjudicators in 11 field locations. We selected nine of these offices—the Arlington Asylum Office, California Service Center, Chicago Field Office, Los Angeles Field Office, Miami Asylum Office, New York Asylum Office, New York Field Office, Vermont Service Center, and Washington Field Office—from across the three adjudicative directorates based on the size, work volume, work composition, and geographic location of the office. We selected larger offices by staff size and work volume and those with work composition that included a range of immigration benefit fraud types. We also selected two offices with distinct operational focus to conduct interviews—the National Benefits Center and Refugee and International Operations.

During these interviews, we discussed topics related to the volume and composition of FDNS's work, staff resources, assessments of fraud risks, and antifraud activities. The information we obtained in these interviews is

not generalizable to all USCIS field locations but provide valuable insights from FDNS Immigration Officers and adjudicators. We also reviewed our prior work regarding the management of fraud risks to certain immigration benefit types.[1]

To address the first objective, we obtained and analyzed summary-level data on the volume, composition, and time frames to complete various FDNS operational activities for fiscal years 2016 through 2021 from FDNS Data System (FDNS-DS), a case management system.[2] Specifically, we analyzed data from FDNS's annual data reports, which represent a snapshot in time captured at the end of each fiscal year, to describe the volume and composition of benefit fraud leads, benefit fraud cases, site visit activities, requests for assistance, national security, and public safety concerns, and social media checks. To reflect FDNS's workload in each fiscal year and identify changes in that workload over the time period we examined, we used the annual data reports as the sources for FDNS's work volume and composition data for fiscal years 2016 through 2021. We analyzed summary data on time frames to complete various case management activities and total hours spent on those activities, which FDNS officials pulled from FDNS-DS based on parameters we defined.[3]

We assessed the reliability of FDNS-DS data by (1) testing for consistency between different data files; (2) reviewing user guides, standard operating procedures, and other documentation related to FDNS-DS; and (3) interviewing and obtaining information from USCIS officials on how they collected, used, and assessed the data. We determined that these data were sufficiently reliable for the purposes of

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[1]GAO, *Asylum Fraud: Additional Actions Needed to Assess and Address Fraud Risks*, GAO-16-50 (Washington, D.C.: Dec. 2, 2015); GAO*, Immigrant Investor Program: Additional Actions Needed to Better Assess Fraud Risks and Report Economic Benefits*, GAO-15-696 (Washington, D.C.: Aug. 12, 2015); GAO, *Progress Made to Detect and Prevent Fraud, but Additional Actions Could Further Agency Efforts,* GAO-16-828 (Washington, D.C.: Sep. 13, 2016) GAO, *Refugees: Actions Needed by State Department and DHS to Further Strengthen Applicant Screening Process and Assess Fraud Risks*, GAO-17-706 (Washington, D.C.: July 31, 2017); GAO, *Immigration Benefits: Additional Actions Needed to Address Fraud Risks in Program for Foreign National Victims of Domestic Abuse*, GAO-19-676 (Washington, D.C.: Sep. 30, 2019).

[2]This time frame included the most recent 6 fiscal years for which data were available at the time of our review.

[3]Those parameters included the case management activity, fiscal year, and the outcome of the investigation, among others.

describing the volume and composition of FDNS's workload and the time frame to complete various operational activities. In addition to these analyses, we interviewed USCIS officials from headquarters and field locations to identify factors contributing to changes in FDNS's work volume and composition, as well as data entry practices in FDNS-DS.

To address the second objective, we obtained and analyzed human capital data on USCIS staffing levels from fiscal years 2016 through 2021.[4] We assessed the reliability of these data by reviewing related documentation and interviewing knowledgeable USCIS officials on how they compile and manage the data. We found the data were sufficiently reliable to compare FDNS's onboard and allocated staffing levels, vacant staffing levels, and vacancy rates by fiscal year. We also obtained and analyzed data on staffing allocations and workload estimates from FDNS staffing models, including productivity measures such as total hours immigration officers spent working on operational activities for fiscal years 2016 through 2021. We assessed the reliability of these data by reviewing related documentation and interviewing knowledgeable USCIS officials about how they use the data.

Based on our analysis, we determined that the data for fiscal year 2016 were not comparable to later models. Specifically, FDNS was responsible for developing its staffing model for fiscal year 2016; however, USCIS's Office of Performance and Quality assumed responsibility for it starting with the fiscal year 2017 model and implemented several changes, including how they used historical data to estimate staff resource needs. As a result of those methodological changes, we did not include fiscal year 2016 staffing model estimates in our assessment. We determined that the data were sufficiently reliable and methodologies were sufficiently consistent to compare staffing allocation and workload estimates for fiscal years 2017 through 2021.

Moreover, we evaluated the extent to which FDNS staffing models adhere to key principles for staffing models. We developed these key principles for staffing models and reported them in prior work, including our 2021 report on the staffing models USCIS uses to estimate the staff resource

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[4]This time frame included the most recent 6 fiscal years for which data were available at the time of our review.

needs of its adjudicative directorates.[5] We then reviewed and analyzed the underlying data and methodologies used in the staffing models for fiscal years 2017 through 2021, and interviewed USCIS officials to assess the process for implementing the staffing models. We assessed the staffing model against our criteria and determined whether the key principle was met, partially met, or not met using the scale in table 8.

Table 8: Definitions of Met, Partially Met, or Not Met Used to Assess the U.S. Citizenship and Immigration Services (USCIS) Fraud Detection and National Security Directorate (FDNS) Staffing Model

Category	Definition
Met	Documents and interviews with USCIS officials demonstrated that USCIS incorporated the principle into the FDNS staffing model.
Partially Met	Documents and interviews with USCIS officials demonstrated that USCIS incorporated some aspects of the principle into the FDNS staffing model.
Not Met	Documents and interviews with USCIS officials demonstrated that USCIS did not incorporate the principle into the FDNS staffing model.

Source: GAO analysis of USCIS information. | GAO-22-105328

To address the third objective, we obtained and analyzed USCIS fraud risk assessments, as well as other related documentation, including FDNS's annual priorities that articulate the agency's priorities and objectives for antifraud activities. We also interviewed officials from FDNS headquarters and USCIS's Office of Policy and Strategy about the process for conducting fraud assessments, how it has changed over time, and how those fraud risk assessments are used to develop an antifraud strategy for the agency. As previously described, we supplemented these interviews with relevant information gathered from interviews with FDNS officials located in the field. We evaluated the extent to which these practices were consistent with leading practices described in our guidance *A Framework for Managing Fraud Risks in Federal Programs* for assessing fraud risks and using the information to develop an antifraud strategy.[6]

To address the fourth objective, we obtained and analyzed documentation about FDNS's policies, procedures, and other guidance to

[5]GAO, *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload*, GAO-21-529 (Washington, D.C.: Aug. 18, 2021). Also see *DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models*, GAO-13-92 (Washington, D.C.: Dec. 14, 2012); and *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, GAO-10-802R (Washington, D.C.: June 14, 2010).

[6]GAO, *A Framework for Managing Fraud Risks in Federal Programs*, GAO-15-593SP (Washington, D.C.: July 2015).

understand how antifraud activities—including the use of technology to
support those activities—have changed since fiscal year 2016 and
obtained and analyzed FDNS's annual priorities and performance
measures. We also interviewed FDNS headquarters and field officials to
gather information on FDNS's antifraud activities, including how changes
to those activities were implemented. We evaluated the extent to which
FDNS's process for evaluating and monitoring the effectiveness and
efficiency of its antifraud activities is consistent with *A Framework for
Managing Fraud Risks in Federal Programs*.[7]

We conducted this performance audit from July 2021 to September 2022
in accordance with generally accepted government auditing standards.
Those standards require that we plan and perform the audit to obtain
sufficient, appropriate evidence to provide a reasonable basis for our
findings and conclusions based on our audit objectives. We believe that
the evidence obtained provides a reasonable basis for our findings and
conclusions based on our audit objectives.

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[7]GAO-15-593SP.

Appendix II: Data on FDNS's Workload for Fiscal Years 2016 through 2021

This appendix provides additional information on the volume and composition of FDNS's workload from fiscal years 2016 through 2021.

Benefit Fraud Case Completion Times

Table 9 shows the median number of days between creation and closure of a benefit fraud case in the FDNS data system. As discussed in the report, the median number of days fluctuated between fiscal years 2016 and 2019, then increased in fiscal years 2020 and 2021.

Table 9: USCIS Fraud Detection and National Security Directorate (FDNS) Median Time Frame from Benefit Fraud Case Creation to Closure, Fiscal Years 2016 through 2021

| Fiscal year	Median days between case creation and completion
2016	161
2017	166
2018	179
2019	136
2020	204
2021	349

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Types of Benefit Fraud Investigated

Figure 9 shows the type of fraud that was the subject of benefit fraud cases completed from fiscal years 2016 through 2021. Potential marriage fraud was consistently the most common subject of benefit fraud investigations. Specifically, between 41 percent and 49 percent of completed benefit fraud cases each fiscal year investigated potential marriage fraud. Other subjects of FDNS benefit fraud investigations included potential fraud in other family relationships, in the employment relationship that established eligibility for the benefit type, and in material facts in support of an asylum or refugee claim. Cases related to a Department of Homeland Security operation to identify potential indicators of fraud related to naturalized citizens whose applications lacked

fingerprint data were another frequent subject of investigation during this time period.[1]

Figure 9: USCIS Fraud Detection and National Security Directorate (FDNS) Benefit Fraud Cases Completed by Fraud Type, Fiscal Years 2016 through 2021
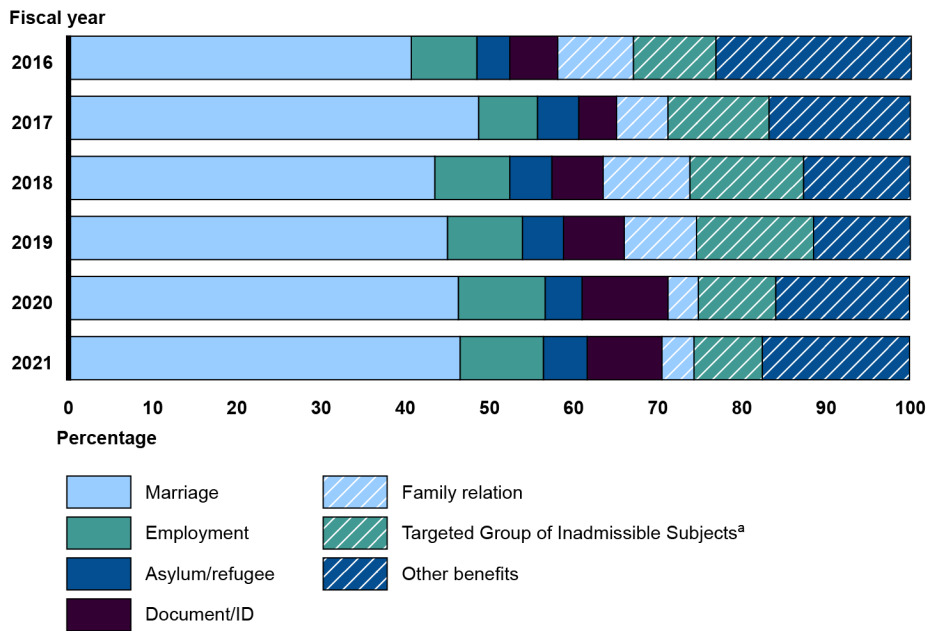
Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Targeted Group of Inadmissible Subjects refers to a Department of Homeland Security operation to identify naturalized citizens to whom USCIS granted benefits despite missing fingerprint data and to review those citizens' eligibility.

Benefit Fraud Case Investigation Outcomes

Figure 10 shows the outcomes of benefit fraud cases completed from fiscal years 2016 through 2021. As discussed earlier in the report, FDNS removed the option for Immigration Officers to find the results a benefit fraud case "inconclusive" in fiscal year 2019, leading to the subsequent decrease in that finding type, though some Immigration Officers continued to use the inconclusive option in fiscal years 2020 and 2021. Additionally, the percent of benefit fraud cases closed without a Statement of

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[1]A Department of Homeland Security Office of Inspector General report found that missing fingerprint data resulted in USCIS naturalizing at least 858 applicants without reviewing their fingerprints. In response, the department formed a team of USCIS, ICE, and other department officials to review those citizens' eligibility. Department of Homeland Security, Office of Inspector General, *Potentially Ineligible Individuals Have Been Granted U.S. Citizenship Because of Incomplete Fingerprint Records,* OIG-16-130 (Washington, D.C.: September 2016).

Findings—the memo FDNS Immigration Officers use to describe
investigation findings to adjudicators—increased following the removal of
the inconclusive finding option in fiscal year 2019.

Figure 10: USCIS Fraud Detection and National Security Directorate (FDNS) Benefit Fraud Cases Completed by Outcome, Fiscal Years 2016 through 2021
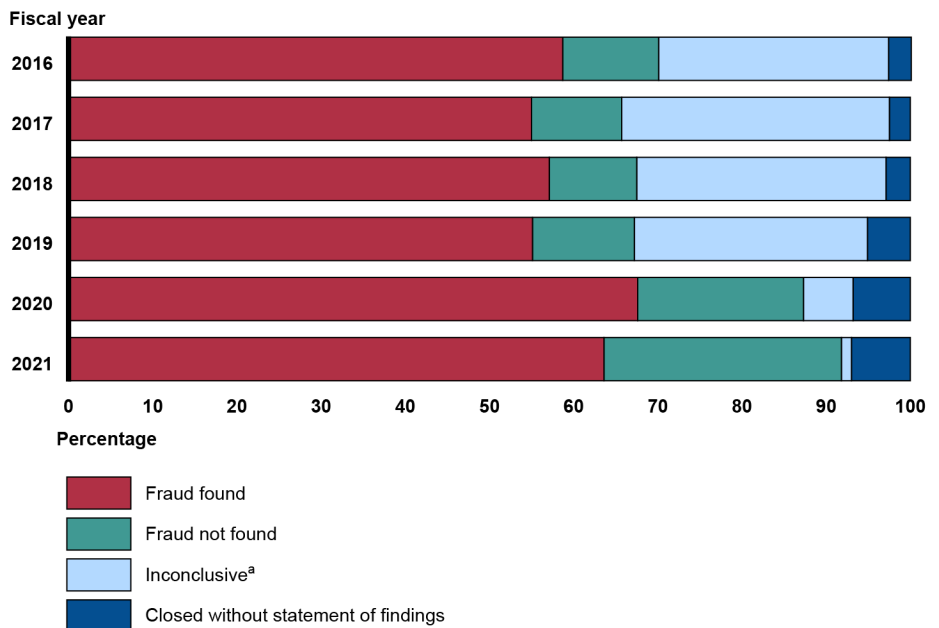
Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

aFDNS used the Inconclusive finding when investigations contained potential fraud indicators that did
not meet the evidentiary standard for "Fraud Found." FDNS removed this option from standard
operating procedures in fiscal year 2019, accounting for the decrease in benefit fraud cases with that
finding in fiscal years 2020 and 2021.

Referrals for Criminal Investigation of Benefit Fraud

Table 10 shows the number of benefit fraud cases that FDNS referred to
ICE for criminal investigation and the number of benefit fraud
investigations ICE initiated from fiscal years 2016 through 2021. As
established in a 2008 Memorandum of Agreement between USCIS and
ICE, FDNS may refer benefit fraud cases that meet certain criteria—such
as suspicions of a large-scale fraud scheme or misconduct by an attorney
or preparer—to a national or local ICE office for criminal investigation.
ICE reviews the referral and, if appropriate, transfers it to ICE Homeland
Security Investigations. The Memorandum of Agreement requires FDNS
to suspend its investigation for 60 days following a referral to ICE. If ICE
declines the referral or does not take action within that time frame, FDNS

Immigration Officers may resume the administrative investigation or refer the case to another law enforcement agency, such as the FBI.

Both the number of benefit fraud concerns FDNS referred for criminal investigation and the percent of those referrals that resulted in criminal cases were smaller in fiscal year 2021 than in fiscal year 2016. The number of investigative referrals for fraud that FDNS sent to ICE fluctuated between fiscal years 2016 and 2019, then decreased in fiscal years 2020 and 2021, when created and completed benefit fraud cases also decreased. The percent of those investigative referrals that ICE Homeland Security Investigations accepted for criminal investigation also fluctuated from fiscal year 2016 through 2021, but decreased overall. In the time period we examined, ICE Homeland Security Investigations initiated the largest number of cases in fiscal year 2017, when it initiated a fraud case in response to approximately 330 of the 840 investigative referrals FDNS made that year (39 percent).

Table 10: USCIS Fraud Detection and National Security Directorate (FDNS) Referrals to ICE and ICE Homeland Security Investigations (HSI) Cases Initiated, Fiscal Years 2016 through 2021 (Approximate)

Fiscal year	2016	2017	2018	2019	2020	2021	Total
Total referrals for fraud sent from FDNS to ICE	1,160	840	1,120	1,140	950	740	**5,950**
HSI fraud cases initiated	270	330	240	160	170	110	**1,280**
Percent of FDNS referrals that resulted in an HSI case	23%	39%	21%	14%	18%	15%	**22%**

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) and U.S. Immigrations and Customs Enforcement (ICE) data. | GAO-22-105328

Note: Our review identified varying data entry and categorization practices among FDNS Immigration Officers aligned with adjudicative directorate offices. To mitigate those issues, we rounded the FDNS data to the nearest ten and also rounded the corresponding HSI data to remain consistent with this methodology.

Site Visit Program Work

Table 11 shows the number of site visits FDNS created and completed in the FDNS data system between fiscal years 2016 and 2021. As discussed in the report, the volume of work in both the Administrative and Targeted Site Visit and Verification Programs decreased in fiscal years 2020 and 2021 due to the impact of COVID-19 on USCIS's operating environment. Specifically, USCIS suspended in-person services from March to June 2020, and FDNS did not conduct in-person site visits during this time. Later in that year, USCIS reduced its spending to offset COVID-driven revenue loss, and those limitations prevented FDNS staff from conducting site visits that required overnight lodging or overtime,

according to FDNS documentation.[2] As a result, the number of total
completed site visits across the two site visit programs decreased by 45
percent between fiscal years 2019 and 2020, from approximately 12,540
site visits to 6,910. FDNS resumed in-person site visit program work by
the end of fiscal year 2020, completing approximately 9,830 site visits in
fiscal year 2021, though this total remained lower than pre-pandemic
levels.

**Table 11: USCIS Fraud Detection and National Security Directorate (FDNS) Site Visit Program Visits Created and Completed
by Program Type, Fiscal Years 2016 through 2021**

Fiscal Year	Administrative Site Visit and Verification Program		Targeted Site Visit and Verification Program	
	Created	Completed	Created	Completed
2016	11,170	10,360	0	0
2017	10,060	11,030	300	100
2018	9,750	9,720	2,090	1,130
2019	2,760	4,030	10,040	8,510
2020	3,820	2,560	4,040	4,350
2021	3,310	3,940	5,620	5,890

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Due to inconsistent data entry and categorization practices in FDNS data, we rounded these
data to the nearest ten. Additionally, FDNS began visits in Targeted Site Visit and Verification
Program partway through fiscal year 2017. Site Visit Program visits completed in a fiscal year may
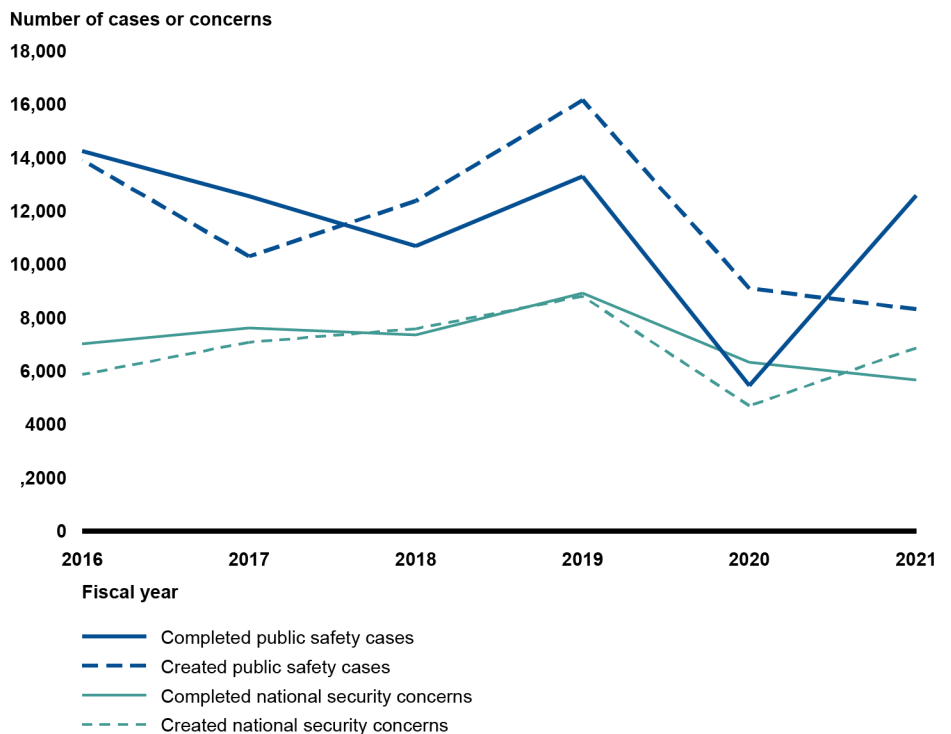have been created in that fiscal year or a prior fiscal year.

Public Safety and National Security Work

Figure 11 shows the volume of created and completed public safety and
national security concerns between fiscal years 2016 and 2021. As
discussed in the report, the volume of both workloads fluctuated between
fiscal years 2016 and 2019 and declined in fiscal year 2020. Specifically,
public safety cases decreased from approximately 16,170 created and
13,300 completed in fiscal year 2019 to approximately 9,100 created and
5,450 completed in fiscal year 2020. National security concerns
decreased from approximately 8,800 created and 8,920 completed in
fiscal year 2019 to approximately 4,700 created and 6,330 completed in
fiscal year 2020. This decrease coincided with agency-wide office
closures and financial issues related to COVID-19, which FDNS officials

[2]We have previously reported that USCIS's overall revenues decreased by about 40
percent at the beginning of the COVID-19 pandemic due to travel restrictions and USCIS
field office closures. This decrease persisted for approximately 6 weeks in March to May
2020. See: GAO, *Reviewing Existing Policies Could Help Selected Agencies Better
Prepare for Dedicated User Fee Revenue Fluctuations*, GAO-21-104325 (Washington,
D.C.: Sept. 29, 2021).

said caused a similar decrease in the volume of benefit fraud cases. While created public safety cases continued to decline in fiscal year 2021, completed public safety cases returned to pre-COVID levels. That same year, created national security concerns returned to pre-COVID levels while completed national security concerns continued to decline.

Figure 11: USCIS Fraud Detection and National Security Directorate (FDNS) Public Safety Cases and National Security Concerns Created and Completed, Fiscal Years 2016 through 2021

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Public safety cases and national security concerns completed in a fiscal year may have been created in that fiscal year or a prior fiscal year.

Social Media Checks

Table 12 shows the number of social media checks FDNS completed between fiscal years 2016 and 2021. FDNS Immigration Officers conduct two types of social media checks: Enhanced FDNS Reviews and field checks. Enhanced FDNS Review refers to a social media screening process the Social Media Division in FDNS Headquarters conducts. Applicants for asylum and refugee benefits who meet certain criteria, as well as individuals who present national security concerns, are the subjects of Enhanced FDNS Reviews. In addition to these criteria-based

social media checks, FDNS Immigration Officers in field locations—who the Social Media Division trains and certifies to carry out social media research—may conduct "field checks" as part of a FDNS investigation for benefit fraud, public safety, or national security concerns. For example, FDNS staff might request a field check if they believe information in an applicant's social media postings may provide evidence of benefit fraud.

As discussed in the report, the volume of social media checks was generally consistent after FDNS introduced them in fiscal year 2016. Enhanced FDNS Reviews comprised the majority of social media checks each year—for example, in fiscal year 2021, FDNS completed approximately 10,050 Enhanced FDNS Reviews and 590 field checks (see table 12).

Table 12: USCIS Fraud Detection and National Security Directorate (FDNS) Social Media Checks Completed by Type, Fiscal Years 2016 through 2021

Fiscal Year	2016	2017	2018	2019	2020	2021
Total Social Media Checks Completed	**870**	**10,080**	**13,860**	**11,420**	**9,730**	**10,640**
Enhanced FDNS Reviews (subset of total checks)	-	-	-	11,340	9,040	10,050
Field Checks (subset of total checks)	-	-	-	80	690	590

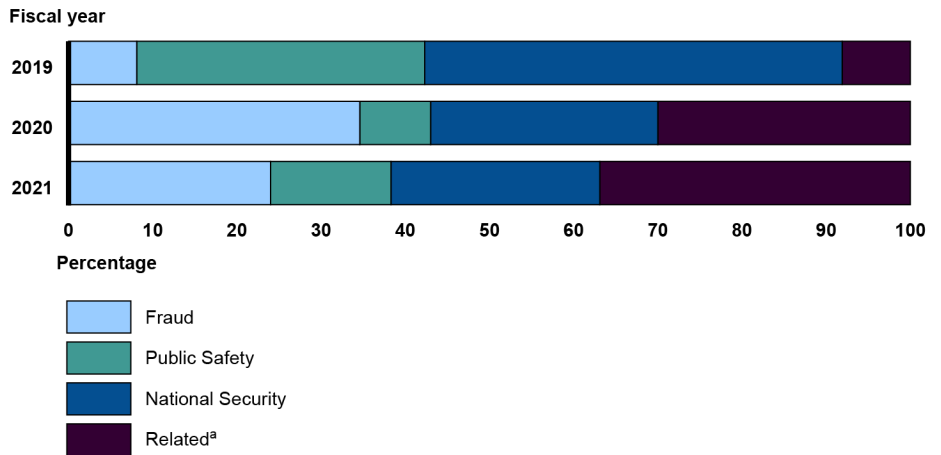Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

Note: Due to inconsistent data entry and categorization practices in FDNS data, we rounded these data to the nearest ten. Because FDNS used different reporting methodology for social media checks between fiscal years 2016 and 2019, this table uses FDNS workload statistics from fiscal years 2020 and 2021 to report on all six years.

Over the time period we examined, between 1 and 5 percent of the total social media checks FDNS completed each fiscal year identified information of interest. FDNS Immigration Officers record information of interest in a Social Media Assessment; FDNS later communicates that information to adjudicators. For example, an FDNS Immigration Officer could flag information due to an affiliation with a known terrorist organization or criminal gang. Immigration Officers may also flag "Related" information of interest that supports claims an applicant or petitioner made to USCIS when seeking an immigration benefit.

Figure 12 shows the composition of Social Media Assessment findings, which shifted over time. Benefit fraud and "Related" findings became more common, while public safety and national security findings became less common. In fiscal year 2019, 8 percent of total Social Media Assessments contained benefit fraud findings. In fiscal year 2021, 24 percent of total Social Media Assessments contained benefit fraud

findings. During the same period, "Related" findings increased from 8 percent of Social Media Assessments in fiscal year 2019 to 37 percent in fiscal year 2021.

Figure 12: USCIS Fraud Detection and National Security Directorate (FDNS) Findings of Social Media Assessments, Fiscal Years 2019 through 2021

Source: GAO analysis of U.S. Citizenship and Immigration Services (USCIS) data. | GAO-22-105328

[a]"Related" findings refer to social media information that supports claims an applicant or petitioner made to USCIS while seeking an immigration benefit.

Appendix III: Comments from the Department of Homeland Security

Homeland Security

August 26, 2022

Rebecca Gambler
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-105328, "U.S CITIZENSHIP AND IMMIGRATION SERVICES: Additional Actions Needed to Manage Fraud Risks"

Dear Ms. Gambler:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition of the progress U.S. Citizenship and Immigration Services (USCIS) has made in recent years to: (1) conduct targeted fraud risk assessments for a sub-set of immigration benefits; (2) improve the accuracy of the data it uses to track anti-fraud activity and employee productivity in the Fraud Detection and National Security Directorate (FDNS) Data System (FDNS-DS); and (3) examine the process of reviewing, confirming, and distributing System Generated Notifications (SGNs). DHS remains committed to documenting fraud risk profiles for the immigration benefits USCIS is responsible for adjudicating, as well as developing, implementing, and regularly updating a data-driven USCIS antifraud strategy as called for in GAO-15-593 "A Framework for Managing Fraud Risks in Federal Programs," dated July 28, 2015;[1] and measuring the effectiveness and efficiency of resulting USCIS antifraud activities.

The draft report contained six recommendations with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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[1] https://www.gao.gov/products/gao-15-593sp

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future

Sincerely,

JIM H CRUMPACKER
Digitally signed by JIM H CRUMPACKER
Date: 2022.08.26 07:43:17 -04'00'

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Enclosure

2

**Enclosure: Management Response to Recommendations
Contained in GAO-22-105328**

GAO recommended that the Director of USCIS:

Recommendation 1: Identify the factors that affect FDNS's workload to ensure the
staffing model's assumptions reflect operating conditions.

Response: Concur. The USCIS Office of Performance and Quality (OPQ)
developed the Model for Operational Planning (MOP) for resource allocation
modelling, which addresses risk factors that affect FDNS' workload. The MOP
will be used in conjunction with the Staffing Allocation Model (SAM), as well as
for modelling the overall operational capacity of the agency. The SAM will
continue to be used as a resource for projecting the future costs of the agency's
projected workload, which is the SAM's primary scope.

However, actions to address this recommendation will require a more consolidated
agency approach, with the operational directorates utilizing FDNS-DS (or successor
system) to memorialize all work, including dispositions of derogatory information, staff
hours, etc. This will allow for accurate reporting, transparency, and information to help
inform staffing allocation models.

USCIS FDNS Reports and Analysis Branch (RAB) assesses that FDNS-DS NextGen, the
planned successor system, will allow for more accurate correlation analyses based on the
enhanced data collection capabilities of the new case management system. Further, OPQ
will conduct a correlation analysis to further explore factors that affect FDNS' workload
drivers once twelve months of data is available after taking action to identify data entry
concerns, develop, update, and disseminate data entry guidance to system users in
operational directorates and update any affected Standard Operating Procedures (SOP),
which is currently anticipated to be complete by June 30, 2023 (Recommendation 2).

The USCIS OPQ Workforce and Operations Research Branch Chief has primary
responsibility for implementing actions to address this recommendation, with
assistance from the USCIS FDNS Reports and Analysis Branch Chief. Estimated
Completion Date (ECD): October 30, 2024.

Recommendation 2: Develop and implement additional guidance on FDNS data entry
practices for fields used as staffing model inputs to ensure consistency and produce
quality and reliable data.

Response: Concur. As RAB has done in the past with the Lead Creation, Request
for Assistance, and Hours data entry guides, RAB will work with the FDNS Fraud

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Division, National Security and Public Safety Division, Systems Integration
Division, and representatives from the operational directorates and program offices
through the USCIS Data Quality Working Group to identify data entry concerns,
develop, update, and disseminate data entry guidance to system users in operational
directorates and update any affected SOPs. ECD: June 30, 2023.

Recommendation 3: Develop and implement a process – including clearly defining
roles and responsibilities – for regularly conducting fraud risk assessments and
documenting fraud risk profiles for the immigration benefits USICS is responsible for
adjudicating.

Response: Concur. USCIS currently uses its FDNS Risk Framework Model—which
compares receipt filings with fraud findings over multiple years—and its associated
interactive dashboard, to evaluate the prevalence of fraud associated with a defined set of
immigration benefits, and will assess the efficacy of this model and make modifications,
as appropriate. In addition, USCIS will establish an intra-agency group to use relevant
models and available data to identify the immigration benefits with the highest fraud risk
profile for prioritization of additional fraud risk assessments. This group will include
FDNS, the USCIS Office of Security and Integrity, the Office of Policy and Strategy
(OP&S), OPQ, and the USCIS Office of the Chief Financial Officer (OCFO) Strategy
and Evaluation Division (SED), as well as key stakeholders from USCIS adjudicative
directorates. This group will be responsible for implementing this recommendation and
will prioritize and complete fraud risk assessments for benefit types identified.

Interim milestones to implement this recommendation include: (1) creation of a
USCIS-approved plan to regularly conduct fraud risk assessments by March 31,
2023; and (2) completion of initial documentation of at least one fraud risk profile
by July 31, 2023. ECD: August 31, 2023.

Recommendation 4: Develop and implement a process for developing and regularly
updating an antifraud strategy that is aligned to the agency's fraud risk assessments.

Response: Concur. USCIS FDNS, OP&S and OPQ will coordinate and create the
anti-fraud strategy with consolidated input from key stakeholders throughout
USCIS. The strategy will represent agreed-upon risks aligned to the agency's
fraud risk assessments. As part of efforts to address this recommendation, USCIS
anticipates creating a USCIS-approved plan to regularly update an antifraud
strategy by June 30, 2023. ECD: October 31, 2023.

Recommendation 5: Develop and implement a process – including clearly defining
roles and responsibilities – for risk-based evaluation of the effectiveness and the
efficiency of antifraud activities.

4

Response: Concur. Although FDNS, on a limited basis, evaluates effectiveness and efficiency of certain antifraud activities such as Site Visit Programs and SGNs, these evaluations are not part of a formal, cohesive USCIS-wide evaluation framework. Accordingly, the USCIS OCFO SED will work with FDNS and other directorates, as appropriate, to develop a process for implementing risk-based evaluations of the effectiveness and efficiency of anti-fraud activities. Further, USCIS is currently developing its agency Learning Agenda, Annual Evaluation Plans, and evaluation capacity building efforts, and is considering anti-fraud activities for evaluation.

In order to develop a process for and to conduct risk-based evaluations of anti-fraud activities, however, there must be a risk assessment. As such, USCIS will not consider this recommendation fully implemented until first completing risk assessment activities previously described in responses to recommendations in this letter by July 2023 (Recommendation 3) and October 2023 (Recommendation 4). Furthermore, outcome-oriented evaluations of anti-fraud activities are often difficult because, as noted in GAO-15-593, the deceptive nature of fraud can make it difficult to measure the extent of fraud in a reliable way, which can affect managers' capacity to evaluate outcomes and establish baselines. As such, using a risk-based approach, USCIS may aim to identify specific and well-defined anti-fraud activities for which adequate data can be obtained for outcome-oriented evaluations or elect to conduct an evaluation against best practices. ECD: February 29, 2024.

Recommendation 6: Develop outcome-oriented performance metrics, including baselines and targets as appropriate, to monitor the effectiveness of its antifraud activities.

Response: Concur. USCIS, overall, and FDNS will update performance metrics at least annually in order to ensure that the metrics are aligned with DHS and USCIS strategic plans, the USCIS Director's priorities, and any emerging high priority initiatives. FDNS will also develop additional performance metrics at the directorate level, and propose additional performance metrics at the agency level, to monitor the extent to which mitigation strategies for identified fraud risks are effectively implemented.

These efforts will be led by the FDNS Chief of Staff with assistance from the OCFO Budget and Planning Division Chief and the OPQ Chief Evaluation Officer. Efforts to implement this recommendation are also dependent on the proposed actions to align antifraud strategies to agency fraud risk assessments by January 2024 (Recommendation 4), and address processes for risk-based evaluation of antifraud activities February 2024 (Recommendation 5). ECD: March 29, 2024.

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Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact	Rebecca Gambler at (202) 512-8777 or gamblerr@gao.gov
Staff Acknowledgments	In addition to the contact named above, Adam Hoffman (Assistant Director), Ashley Davis (Assistant Director), Jessica Wintfeld (Analyst-in-Charge), Diana Chung, Alison Knowles, Michele Fejfar, Sasan J. "Jon" Najmi, Rebecca Shea, Heather Dunahoo, Erin Mclaughlin Villas, Adam Vogt, and Eric Hauswirth made key contributions to this report.

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