

The Team



Ravi Bala



Shelina Taki



Anirma Gupta



Rogers Weed



Ann Lewis



Julie Yarosh

The Goal:

To accelerate the rate of naturalization through implementing and standardizing video interviews for more efficient naturalization adjudication, agency-wide.

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Strategic Overview

Problem Definition:

The naturalization interview is the longest step of the process for the vast majority of citizenship applicants. Unequal case load distribution between USCIS offices where interviews take place can contribute to disproportionate backlogs in certain locations. Interviews are affected by the COVID-19 pandemic more than any other step in the process. USCIS needs innovation to address the growing backlog of citizenship applications nad provide more resiliency for the agency going forward.

Proposed Solution:

A three-phased approach that will expand upon existing agency steps taken to conduct interviews via **video conferencing technology (VTC)** as prompted by the COVID-19 pandemic. These steps are also beneficial for long-term adoption agency-wide.

- **Phase 1:** Standardize and streamline the current video interview process for intra-office video conferences during COVID-19. The applicant and adjudicator are located in the same building, but in different rooms, to allow for the safe removal of masks.
- **Phase 2:** Implement a pilot where the video interview process allows the applicant and the adjudicator to be located in separate USCIS office locations.
- Phase 3: Outline an initiation plan that would allow adjudicators to work from, and conduct video interviews, from home.

Executive Summary

NATURALIZATION INTERVIEWS: AN EVOLVED APPROACH

WHERE WE'VE BEEN

For years, citizenship interviews have been held face to face at USCIS field offices around the country. Interviews are traditionally conducted at the field office closest to the applicant's place of residence.

WHERE WE'RE GOING

COVID-19 has made face-to-face interviews unsafe, prompting USCIS to reimagine the protocol for naturalization interviews. A video interview process has been instituted over the past few months whereby participants are still appearing at a field office for interviews, but the applicant and adjudicator are placed in separate rooms. This allows for both parties to remove their masks and facilitate a comfortable, low-risk interaction in light of COVID-19.

Another new interview process is currently being piloted whereby field offices are partnering so that adjudicators in one office can conduct interviews with applicants in another office location via video technology. This pilot solves for the safety concerns of COVID-19, and also eases scheduling as some offices have higher volumes of interview requests and backlogs, as well as more adjudicators, than others.

REDEFINING THE PROCESS

WHAT'S NEXT

This proposal will outline:

- (1) A standardized approach to the intra-office video interview protocols so that video interviews can be implemented across all USCIS offices.
- (2) A scalable approach to expand the current pilot program for inter-office interviews, where the interviewee and adjudicator are in different locations.
- (3) A plan to explore naturalization interviews occurring via video, where the adjudicator can conference in from home and the applicant appears in the USCIS field office.

WHY

With the pandemic still wreaking havoc on the country, the need for virtual interviews will remain. The existing backlog of interviews was a major point of stress for both applicants and USCIS even before COVID-19, and was further exacerbated by the pandemic. The pandemic has warranted the exploration of non-traditional interview methods, including video technology, which has so far proven to be successful and is supported by applicants and USCIS employees alike. The expansion of video-technology interviews across offices will help ease the burden of uneven caseloads and traffic across office locations, and also alleviate the pain points of hiring and training in talent-scarce markets.





Proposal Overview

WHAT IT IS

- A recommendation for how to standardize video interviews for naturalization and expand the practice to more USCIS offices.
- A guide for how to make video technology compatible between USCIS offices in order to enable intra-office video interviewing.
- An plan that enables adjudicators to conduct naturalization interviews via video technology from their own homes.

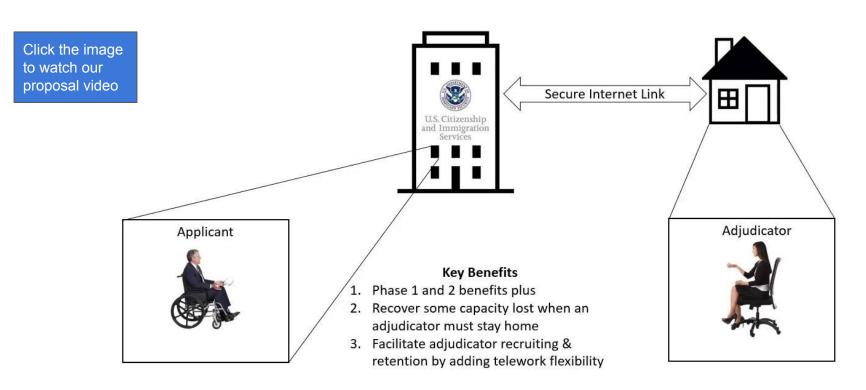
WHAT IT ISN'T

- A rigid set of guidelines that cannot be customized to fit each office's cultures and norms. Customization by office is expected and encouraged.
- A comprehensive technological blueprint of each USCIS office's current and desired state of technology.
- A detailed outline of the operational specifics required to conduct naturalization interviews outside of USCIS offices.



Our Proposal

Phase 3: Applicant at USCIS, adjudicator at home





Impact

FROM TO A large backlog of naturalization An increased rate of interviews, safe applicants held up by interview for both the applicant and the availability, further exacerbated by adjudicator COVID-19 Unequal caseload distribution that An equal distribution across offices, causes large delays in some USCIS based on office bandwidth rather than offices, while leaving others with spare geographic traffic bandwidth Technological disparities between A standard technological baseline USCIS offices, preventing the across all USCIS offices, allowing for agency-wide adoption of video interview innovation regardless of location technology National supply and demand Localized supply and demand management and multiple queues of management via a single queue of applicants applicants A more reliable supply of capacity Less predictable adjudication capacity because of life events that require because adjudicators can work from adjudicators to stay home for the day home when they have to



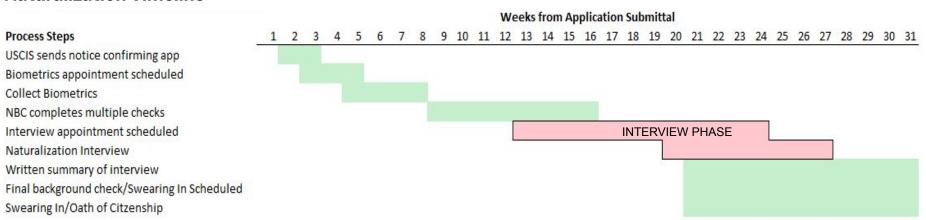
Why Focus on the Interview Phase?

- The interview step is the longest step in the naturalization process.
- The current backlog of naturalization applications will continue to increase as COVID-19 (and other potential crises) continues to constrain the ability of the USCIS to conduct its full capacity of interviews.
- USCIS has indicated that in certain geographies it is **harder to hire and retain officers** whose responsibilities include conducting interviews.
- The current period of **disruption is the ideal time to consider innovative ideas** to pilot alternative ways to efficiently resource naturalization interviews.
- A steady or increasing backlog may act as a deterrent to those lawful permanent residents (LPR) wishing to embark upon the naturalization process.
- Based on our interviews with applicants that have gone through the naturalization process, the interview
 is the most anxiety-producing step in the process.

The Interview Timeline

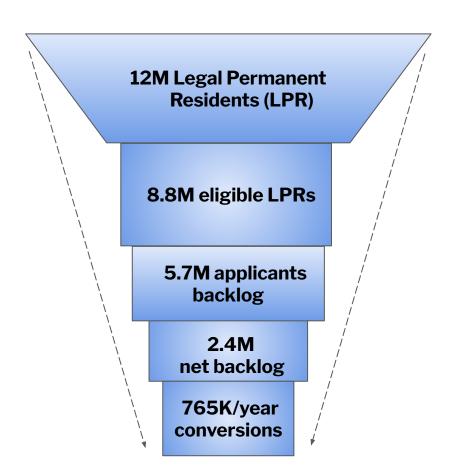
The interview stage of the naturalization process is the longest step in the process and is thus ripe for optimization.

Naturalization Timeline



16

The Backlog is Significant



Source: 'The Road to Naturalization'

Applicant Distribution

USCIS Naturalization and Adjustment of Status Processing Times



12 of 88 USCIS field offices saw 40% of total N-400 submissions in FY16 and FY17.

This indicates that there are likely available, underutilized resources within USCIS.

Stakeholder Interviews



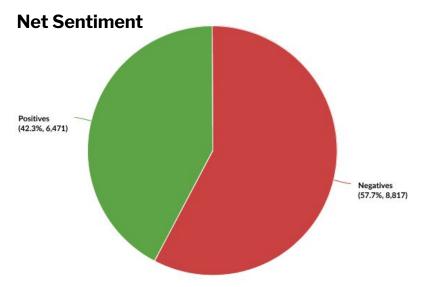
We spoke to:

- Naturalization applicants
- USCIS officers
- USDS professionals
- Immigration attorneys
- NGOs assisting applicants

Sentiment Analysis of Naturalization Process

Over the past 12 months, net sentiment in social media around the naturalization process skews at -15%.

Comments focused on an increase in application costs and delays in the naturalization process. Recent delays were largely driven by the temporary suspension of in-person services that occured due to COVID-19, causing the postponement of interviews.



Conversation Sentiment Drivers face coronavirus crisis update guidance issue ban on admissibility practice social distancing ncrease great deal significant benefit convey immigration benefit. permit waste increase cost face historic budget deny H-1B petition exceed 5.69 million appointment approved green card uscis certified increase citizenship application fee JSCIS delay implement Inadmissibility

accepting new application



A Pilot is Already Underway

We see successes in the existing USCIS pilot, and recommend building upon it.

This work can be leveraged to make a greater impact in a timely manner.

THE OPPORTUNITY

The resumption of in-person services and the continued need for social distancing presented USCIS with an opportunity to introduce **video teleconferencing technology (VTC)** into its naturalization process.

LEGALLY PERMISSIBLE AND OPERATIONALLY FEASIBLE

In the short-term, VTC offers USCIS a legally permissible and operationally feasible solution for resuming interviews [...]. The corresponding regulations require that each naturalization applicant appear in person before a USCIS officer, and that the interview take place in a setting apart from the public. While it is for USCIS to determine its interpretation of its authorizing statute, it is within the agency's discretion to determine the mode of interview—in-person or VTC—and remote interviews can be implemented in a way that satisfies the legal requirements.

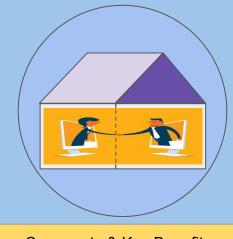
LONG-TERM BENEFITS

In the long term, remote interviews have the potential to increase efficiencies, creating long-term solutions for better balancing workloads and overcoming resource constraints. USCIS can build upon its current remote interview capabilities and adopt best practices from other federal agencies that currently utilize VTC for case adjudications.

VTC as a Scalable Solution

Phase 1

Officer and applicant in separate rooms of the same USCIS building engaged in the virtual naturalization interview



Comments & Key Benefits

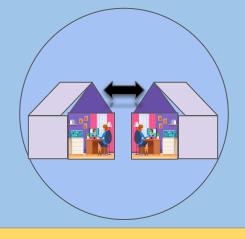
Pilot already occurring at USCIS

Overcomes COVID-19 constraints

Opportunity to standardize at USCIS

Phase 2

Officers and applicants engage from different USCIS offices



Comments & Key Benefits

Small pilot already occurring at USCIS

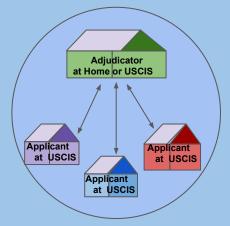
Load balancing across USCIS centers

Localized applicant identity verification

USCIS computer networking in place

Phase 3

Allow officers to work from, and conduct video interviews, from home. Applicants required to be present at USCIS office.



Comments & Key Benefits

Achieving acceleration from scale

Greater safety & flexibility for officers

Reduction in non-adjudication work for officers

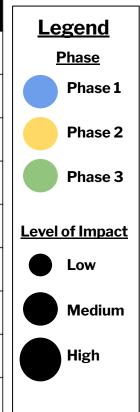
Readiness of the Solution By Phases

People	P1	P2	Р3
Collective bargaining agreements to be honored while solving for hiring, retention, & morale of adjudicators	0	9	\otimes
Exploring availability of adjudicators at other centers and field offices	0	0	\otimes
Cultural Readiness for Change within USCIS	0	0	\otimes
Process	P1	P2	P3
Moving relevant work to 'pre-process' stage in order to lower burden on adjudicators	0	0	\otimes
Training of adjudicators in target centers	0	0	\otimes
End-to End Process design w/Handoffs & Receipts	\odot	0	\otimes
Technology	P1	P2	P3
Video Teleconferencing Technology - software, network bandwidth and security	\odot	0	\otimes
Availability of authorized iPads for applicant consent and (opt) name change	\odot	0	0
Funding for procuring audio/video, networking equipment	\odot	0	\otimes
Integration of scheduling, ELIS systems	N/A	\otimes	\otimes



Benefits by Stakeholder, by Phase

Stakeholder/Benefit	Adjudication Officers USCIS	USCIS	Naturalization Applicant	Applicant's Friends & Family	Applicants for Other USCIS Services
Business Continuity in case of an unexpected event					
Improved Customer Service					
Backlog Reduction					
Load Balancing Opportunity among USCIS offices					
Improved Work Conditions					
Stress Reduction	• • •		• • •	• • •	
Reduced Turnover					
Wait Time Reduction			• • •		
Improved Perception of USCIS				• • •	

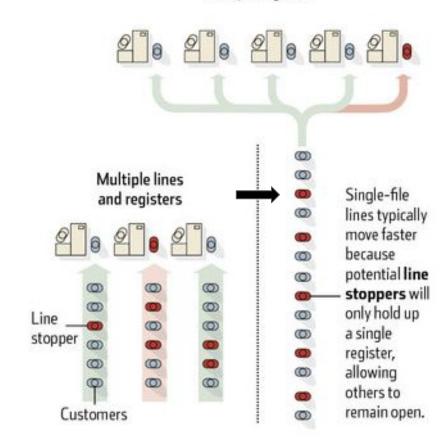




Queuing Theory Explained

Queueing Theory (from mathematics) tells us that a single combined queue of interviews with multiple interviewers is most efficient.

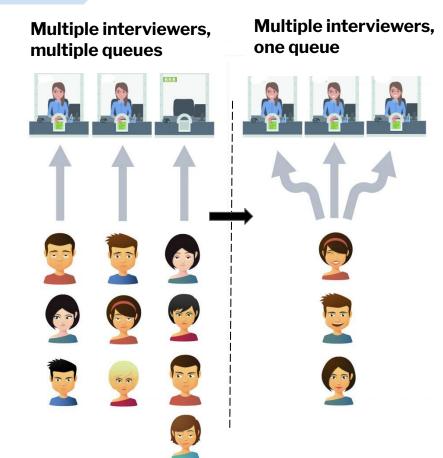
Single line with multiple registers



How Can VTC Increase Efficiencies?

When individual field offices manage separate queues for naturalization interviews, delays at one field office affect everyone in that field office's queue.

When interviews can occur with **any** adjudication officer in any office, many backlogs can be managed like a single queue. A single queue minimizes the impact of delays on other interviewees, leading to **lower wait times overall**.



Critical Success Factors

Politics - Overall

The naturalization phase should be one of the least political phases in the immigration process, though there may be some resistance to increasing voter rolls.

Politics - USCIS

To the extent that field offices and districts are siloed, our second phase may run into resistance from USCIS offices/districts with lighter loads having to assist those with heavier loads. However, USCIS has indicated this should not be a big issue.

People

We will need to ensure that the right training is put into place to allow for USCIS/DHS officers to feel comfortable conducting interviews virtually. This can be done by leveraging best practices from the pilots currently in process.

Process

An effective adoption plan will need to be developed to ensure that USCIS employees conduct VTC interviews with comfort, ease, and a positive mindset.

Technology

A complete survey of technology of USCIS field offices and other relevant DHS offices should be conducted to determine what, if any, technological upgrades are necessary and which are feasible.

Funding

DHS* may need to increase its budget funding request to accommodate any needed technology upgrades, unless such upgrades have already been budgeted for.

> *DHS = Department of Homeland Security

Resources / FAQs

Examples in Action

- -The Omaha, Nebraska USCIS office has been operating a successful remote interview process for the last several years
- -The Raleigh, North Carolina USCIS office has pioneered use of Microsoft Teams and iPads in kiosk mode for conducting video-based interviews with zero budget impact



Assessments and Procurement

- -The following need to be assessed within USCIS offices:
 - Hardware needs
 - Physical and network security needs
 - Internet bandwidth
- Offices should consider reusing existing hardware to support a **no-budget option** using iPads and Microsoft Teams
- -If needed, offices should upgrade field office internet bandwidth

Interagency Knowledge Sharing

- -USCIS field offices already piloting VTC interviews can share details on implementation and outcomes
- -Other federal agencies using VTC for additional adjudicatory functions can share playbooks, training guides, and process guidance. These offices include: Social Security Administration's Office of Disability Adjudication and Review, Dept. of Veteran Affairs' Board of Veteran Appeals and the Dept. of Justice Executive Office for Immigration Review

Best Practices

-The Administrative
Conference of the United
States has published Best
Practices for Using Video
Teleconferencing for
Hearings

Frequently Asked Questions

- Is VTC expensive? There are several VTC implementations available, including a no -budget impact system
- Can VTC-based interviews be secure? Yes, because these VTC-based interviews will be carried out in USCIS offices.

For more questions and answers, please the the Frequently Asked Questions section of the Appendix.

Change Management

Change Management Success Factors (per interviews):

- Retain sense of case ownership
- Do not eliminate paper
- Do not jeopardize quality
- "We cannot afford to be wrong even once"

Define

- Phased Approach
- Technical Change
- Process Change
- Minimal Change to Existing Process

Prepare USCIS & Adjudicators

- Identify new skills
- Develop & implement trainings
- Update job descriptions
 job ads

Change Plan

VTC as a scalable solution to accelerate interviews

Communicate & Engage

- Communicate need & benefits
- Clarify what will and will not change for adjudicators
- •Engage in a 2-way feedback process

Embed in Culture

- Identify champions within USCIS offices
- •Embed into existing systems and processes



Feedback from USCIS

"Phase 3 would be a benefit for employee satisfaction and retention."

"Applicants
have
appreciated
the extra
safety and felt
positive."

"Many offices have been anxious for the Phase 2 solution."

"We are
excited
about the
possibility of
Phase 3."

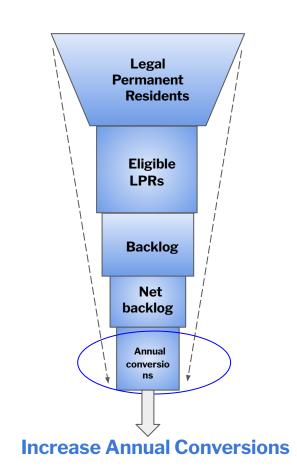
"COVID has made scheduling adjudicators very difficult because of both anxiety about coming to the office and the need to stay home to care for family members."



What Does Success Look Like?

Success is an increase in the rate of naturalization

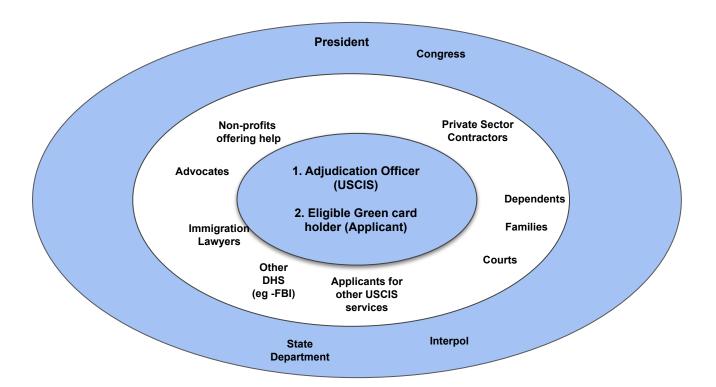
- A consistent increase in interviews completed per adjudicator
- Greater consistency in distribution of # of applications and # of adjudicators by location
- No increase in the error rate
- Increase in employee satisfaction (per employee surveys)



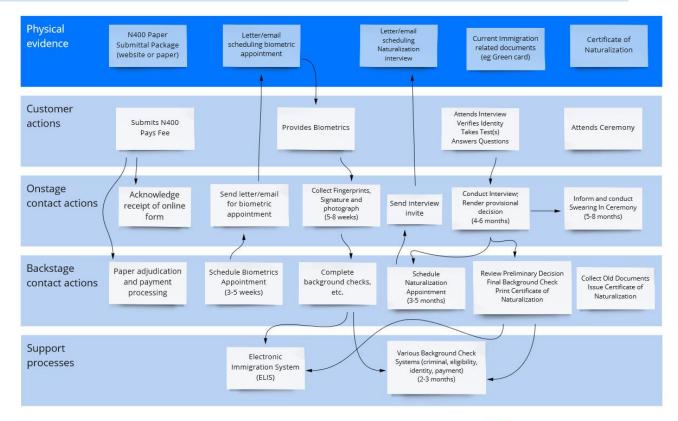




Stakeholder Map



Current Service Blueprint - Naturalization Process



All timeframes noted in parens are from the time the application is filed according to <u>this</u> <u>2017 Inspector General Report</u>

FAQ

Frequently Asked Questions

- Is VTC expensive? There are several VTC implementations available, including a no-budget impact system that uses Microsoft Teams and iPads in kiosk mode. We believe that additional investments in VTC will pay off. For example, in 2011, Social Security Administration's Office of Disability Adjudication and Review ("ODAR") invested tens of thousands in a combination of full-sized room VTC packages and compact Desktop Video Units, and saved approximately \$59 million annual, and \$596 million over 10 years.
- Will VTC make it harder for adjudication officers to perform interviews? Following ACUS' <u>Best Practices</u> for <u>Using Video Teleconferencing for Hearings</u>, the VTC interview system will be designed to ensure that decision-makers have all the information they need to make decisions. It will also be designed to replicate the in-person seeing and hearing experience, including participants' ability to make eye contact with other participants and see the entire hearing room(s)
- Could audio and video glitches interfere with the interview process? There is a very low risk of glitches with off-the-shelf software like Microsoft Teams when an office has sufficient internet bandwidth and IT administrator support. The Department of Justice's EOIR found that < 1% of VTC hearings were adjourned due to video malfunction and only 23 of 10,938 appeals of completed cases with a VTC hearing alleged a VTC hearing issue.

FAQ

Frequently Asked Questions

- Can VTC-based interviews be secure? Yes, because these VTC-based interviews will be carried out in
 USCIS offices. The identity of the interviewee can be checked at the time of arrival to the USCIS office, and at
 the time of the interview, using the office's existing biometric authentication system to confirm identity.
- How will this affect the overall case management process? The field office's case management process will remain the same under the direction and management of the office. A VTC-based adjudication interview will be as similar as possible in structure to an in-person interview, with the added benefit that it becomes easier for adjudication officers to record interviews as needed.

Who is impacted by in the interview phase?

<u>Applicants</u>: The stress of an in-person naturalization interview weighs heavily on many applicants, particularly ones that are older and/or struggle to learn the English language. The long wait to get the interview only exacerbates this tension. One interviewee said that his mother-in-law had a high blood pressure episode as she waited for her naturalization interview. These backlogs affect all applicants.

<u>USCIS</u>: Adjudicators are a scarce resource for USCIS. Interviews USCIS experts have indicated that USCIS staff are highly skilled at their jobs, but are under a lot of pressure to move through their workloads. We've heard rumors about higher turnover in recent years and difficulty training replacements in a timely fashion. We know that the agency experienced higher-than-forecasted application submissions in both FY 2016 and FY2017 and has yet to catch up.

<u>Applicants for other USCIS certifications</u>: Adjudicators conduct interviews for other USCIS processes besides naturalization. As such, applicants for other USCIS certifications may also be impacted by inefficiencies in the naturalization interview step.

<u>Friends & Family of Applicants</u>: The time and stress of the interview step lands directly on the applicant, but indirectly on all of their support network as they work to help the applicant get through the process.

Current & Proposed Practices at USCIS and Other Agencies

- Other federal agency use of VTC: Several federal administrative agencies utilize VTC for court hearings or case adjudications such as the Department of Justice's Executive Office for Immigration Review (EOIR), the Social Security Administration, the Department of Veteran Affairs, and the Department of Health and Human Services.
- Sharing best practices: USCIS offices with experience conducting remote interviews could offer existing operational guidance and best practices on protecting privacy and confidentiality; addressing credibility concerns; permitting an interpreter; and including an attorney or representative in the VTC process.
- Pairing offices: In deciding which field offices to select for the pilot, USCIS might consider pairing offices within the same district with disparate processing times and staffing levels. During the initial implementation, the availability of physical office space will also need to be considered. Understaffed offices with lengthy processing times that have the space necessary to stage or host additional interviews, but lack the staff to conduct those interviews, should collaborate with adequately staffed offices that have median N-400 processing times below the national average. In addition to achieving a better workload balance, pairing offices will allow officers to familiarize themselves with regional issues (e.g. fraud associated with N-648s, interpreters, and other localized concerns).

Source: https://www.dhs.gov/sites/default/files/publications/20_0630_cisomb-2020-annual-report-to-congress.pdf

Regulatory Language Changes Likely Not Needed

Based on interviews with USCIS members, there currently does not need to be a change in regulartory language to allow for VTC interviews because of COVID-19 exceptions. Our interviewees stated that they had no concern with having an applicant in one room and the adjudicating officer in another room within a single field office, nor with the applicant being at one field office and the adjudicating officer being at another field office. Additionally, our sources have indicated that regulatory change may not be necessary for our phase 3 proposal as well, though further internal discussions are needed to confirm.

Office Setup

Seattle Field Office Phase 1 Setup

