

**May 1997**

# **ALIEN APPLICATIONS**

## **Processing Differences Exist Among INS Field Units**



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**General Government Division**

B-275114

May 20, 1997

The Honorable Janet Reno  
The Attorney General  
of the United States

Dear Madam Attorney General:

The Immigration and Naturalization Service (INS) collects fees for processing aliens' applications (and petitions) for such immigration benefits as naturalization and adjustment of status (to become permanent residents).<sup>1</sup> Eighteen percent (\$566 million) of INS' fiscal year 1997 budget of \$3.09 billion is allocated for processing applications.

The number of applications received by INS has been growing and there are indications that some INS field units are faster than others at application processing. In fiscal year 1996, INS received almost 5.4 million new applications and completed about 5.6 million total applications, which is about a 115 percent increase over the number of applications received and completed in fiscal year 1989. At the end of fiscal year 1996, INS had a pending caseload inventory of about 1.7 million applications to be processed. This represented an increase of about 2.5 times the pending caseload at the end of fiscal year 1989. A recent INS report<sup>2</sup> indicated differences in application production rates and projected processing times among its district offices.

Because of the large volume of applications and indications of differences in processing times across INS field units, we initiated a review under our basic legislative authority to determine if significant differences in production rates and processing times existed among field units in

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<sup>1</sup>Until recently, INS was to deposit the revenue from all of these fees into the Immigration Examination Fee Account. The 1989 Department of Justice Appropriation Act established the account to be used to reimburse any appropriation for expenses in providing immigration and naturalization services. P.L. 100-459, 102 Stat. 2186, 2203 (1988). In the fall of 1996, the Illegal Immigration Reform and Immigrant Responsibility Act established a new account, the Immigration Detention Account, into which certain additional fees for adjustment of status are now deposited. P.L. 104-208, 110 Stat. 3009, 3009-648, 3009-649 (1996).

<sup>2</sup>INS Benefits Division Production Report, Fiscal Years 1996-1997.

application processing.<sup>3</sup> Because we found differences, we also asked officials at the nine district offices and two service centers that we visited what factors they believed could have caused the differences. We did not attempt to do the more detailed analyses that would be necessary to determine actual causes. This report presents the results of our work.

## Results in Brief

Our analyses of INS data for the 25-month period of June 1994 through June 1996 showed that statistically significant differences existed in the production rates for the five predominant types of applications processed by INS' district offices and the three predominant types of applications processed by its service centers. For example, the district offices' average production rates for naturalization applications for that period ranged from 0.35 completions per hour to 1.83 completions per hour. The service centers' average production rates for employment authorization applications ranged from 3.11 completions per hour to 5.79 completions per hour.

Large differences also existed in the projected processing times for the two types of applications for which these data were readily available. The data showed that INS district offices' projected processing times ranged from 112 to 678 days to process naturalization applications and from 36 to 799 days to process adjustment-of-status applications. We found no significant statistical relationship between production rates and projected processing times among the district offices.

While we did not determine directly what caused the differences, the wide range in rates and times suggests that opportunities may exist to improve the production and timeliness of some of the INS field units. To that end, we asked INS officials what factors they believed could potentially have caused the differences in the production rates and processing times. They suggested a number of potential factors, including the following:

- differences in the way the field units reported the data we used to calculate the production rates and processing times;

<sup>3</sup>We analyzed the production rates and projected average processing times for each of 25 months in 33 INS districts. We did a Pearson correlation coefficient analysis to determine if statistical relationships between production rates and projected average processing times existed (e.g., was an increase in production rates statistically related to an increase in projected average processing times). We calculated "production rates" as the number of completed applications divided by the productive processing staff hours for each field unit (district office and service center). We calculated monthly projected average processing times by dividing the number of applications pending at month's end by the number of applications completed for the month and multiplying this product by the number of calendar days in the month.

- assistance provided by community-based service organizations in some districts to aliens when filling out their applications;
- the use of outside agencies for conducting naturalization testing by some district offices;
- the authorization of increased overtime for some districts' employees;
- the varying experience levels and degrees of specialization of district office and service center adjudications officers; and
- differences in the staffing levels among some district offices (e.g., some offices were staffed above their authorized levels, while other offices temporarily lost staff to larger offices).

We did not attempt to determine whether or to what degree the factors suggested by the officials may have affected the individual field units' production rates and processing times. We note, however, that differences in processing times mean that aliens in different INS districts have had to wait disparate amounts of time for their applications to be processed. Thus, the need to treat applicants fairly and use government resources efficiently makes both determining the causes of the production and timing differences and, if feasible, improving production and timeliness, important goals for INS.

## Background

INS processes applications for aliens seeking immigration benefits—such as naturalization and adjustment of status—within its 33 district offices' jurisdictions and 4 service centers located in cities throughout the United States.

INS collects fees for processing applications. The fees are generally set on the basis of the approximate cost that INS determines it incurs to process the type of application filed.<sup>4</sup> The revenue from the fees is to be used for expenses incurred in (1) processing applications and (2) collecting, safeguarding, and accounting for the fees. In general, INS processes applications that require aliens to be interviewed (i.e., those for naturalization and adjustment of status) at its district offices. However, at four of its largest district offices, the service centers perform preliminary processing of applications that require aliens to be interviewed. Applications that do not require aliens to be interviewed (e.g., those for

<sup>4</sup>An exception is the adjustment-of-status application fee, which is set by statute at \$1,000 for certain aliens.

employment authorization) are processed at its service centers and district offices.<sup>5</sup>

## Increased Volume of Applications

While experiencing some fluctuations, the overall number of applications received, completed, and remaining in INS' ending inventory significantly increased between fiscal years 1989 and 1996, as shown in table 1.

**Table 1: Number of Applications Received, Completed, and Remaining in Inventory, Fiscal Years 1989 Through 1996**

Fiscal year	Applications		Fiscal year ending inventory
	Received	Completed	
1989	2,510,015	2,585,478	658,399
1990	2,963,428	2,971,300	540,830
1991	3,359,869	3,379,383	568,189
1992	4,234,980	4,207,968	656,067
1993	4,498,208	4,288,643	679,982
1994	4,137,660	3,911,697	987,485
1995	4,976,716	4,265,463	1,765,999
1996	5,393,501	5,557,102	1,673,163

Source: INS budget data for fiscal years 1989 to 1991 and INS G-22.2 and G-22.3 reports for fiscal years 1992 to 1996, dated January 1997.

According to INS officials, the significant increase in the number of applications INS has received since fiscal year 1989 can be attributed to (1) aliens' reactions to proposed changes in state and federal laws that would have denied aliens benefits (e.g., proposals to prohibit children of illegal aliens from attending public schools); (2) aliens having to replace their alien registration receipt cards; and (3) legal aliens becoming eligible to become naturalized and having an incentive to do so because of the benefits that could be derived from their status as citizens. INS officials said that naturalization and adjustment-of-status applications reached record levels in fiscal year 1996. For example, naturalization applications rose from about 423,000 in fiscal year 1989 to over 1.2 million in fiscal year 1996. The officials also said that the level of applications is expected to remain high.

According to INS officials, the waiting time needed to process an application in fiscal year 1995 had increased. For example, the projected

<sup>5</sup>In addition, INS processes applications for asylum at eight offices nationwide. Because such applications are not processed at the district offices or the service centers, we excluded them from our review.

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processing time for naturalization applications exceeded 2 years in several of INS' largest districts. INS added that this increase in processing time was due to (1) the tremendous growth in application receipts, combined with the speed at which the increase occurred; and (2) the lag time to obtain additional resources through the reprogramming process.

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## Changes in Application Processing

In 1986, INS began requiring that some applications, other than those requiring interviews (e.g., those for naturalization and adjustment of status), be mailed directly to service centers for processing, rather than to the district offices.<sup>6</sup> INS called this the "Direct Mail Program." Under a change to the Direct Mail Program, which was effective February 1996, aliens who would have mailed their naturalization applications to one of INS' four largest district offices (Chicago, Los Angeles, Miami, and New York) are required to mail their naturalization applications directly to a designated service center. The service centers are to perform the preliminary processing of the applications in support of these four district offices.<sup>7</sup> The district offices are to complete the processing of these applications by doing additional work (e.g., interviewing the aliens). According to INS officials, INS expects to continue with its plan to expand the Direct Mail Program to include other district offices and application types. The officials added that the Direct Mail Program has greatly assisted these district offices in reducing the large pending workload of naturalization applications.

In addition to expanding its Direct Mail Program, during fiscal year 1996 INS directed more resources to processing naturalization applications. It concentrated its additional staff and other resources primarily in Los Angeles, San Francisco, Miami, Chicago, and New York. These district offices' workloads together comprised 75 percent of pending naturalization applications in fiscal year 1995 and, according to INS officials, this was the reason they were chosen for the Direct Mail Program.

According to INS officials, as a result of these efforts, the number of naturalization applications completed increased by about 166 percent between fiscal years 1995 and 1996, and the pending balance was reduced

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<sup>6</sup>The applications were to be mailed to designated remote adjudications centers, which have since been replaced by the four service centers.

<sup>7</sup>Under the Direct Mail Program, the California Service Center supports the Los Angeles District Office, the Nebraska Service Center supports the Chicago District Office, the Texas Service Center supports the Miami District Office, and the Vermont Service Center supports the New York District Office.

by about 13 percent over the same time period. The officials said that INS received more applications but its capacity to handle applications increased at the same time. However, its pending balance of adjustment-of-status applications increased by about 37 percent. The pending balance for all types of applications decreased by 17 percent. (See table 2.)

**Table 2: Changes in Receipts, Completions, and Pending Balances for Adjustment-of-Status, Naturalization, and All Application Types for Fiscal Years 1995 and 1996**

Application type	Fiscal year	Receipts	Percent change	Completed	Percent change	Pending	Percent change
Naturalization	1995	1,057,759		505,913		803,062	
	1996	1,220,517	15.4	1,344,412	165.7	701,487	(12.6)
Adjustment of status	1995	577,759		357,567		320,770	
	1996	649,792	12.5	541,867	51.5	438,546	36.7
All types	1995	3,341,198		3,401,983		642,167	
	1996	3,523,192	5.4	3,670,823	7.9	533,130	(17.0)

Source: INS G-22.2 and G-22.3 reports for fiscal years 1995 and 1996, dated January 1997.

## INS Application Processing Goals

INS' goal is that the application process will be timely, consistent, fair, and of high quality. In addition, INS officials stated that a quality decision includes a timely decision. During fiscal year 1996, INS made processing naturalization and adjustment-of-status applications among its highest priorities and INS' Commissioner set 6-month and 4-month goals, respectively, for processing these two types of applications.<sup>8</sup> According to INS officials, INS has not established production rate goals.

## Scope and Methodology

To determine the production rates and projected processing times for selected application types at INS' district offices and service centers, we collected and analyzed INS application processing workload summary data and projected processing time reports by application type and by month for the 25-month period ending June 1996. We then compared the production rates and projected processing times for applications among district offices and the production rates for applications among service centers. After identifying differences, we attempted to identify possible reasons for the differences in production rates and processing times. We did this by asking INS officials in headquarters and 11 selected field units

<sup>8</sup>A processing time frame of 90 days for interim employment authorization applications also exists.



what factors they believed could have caused the differences.<sup>9</sup> On the basis of our analyses of production rates and projected processing times, we chose the nine district offices and two service centers we visited because they had a range of production rates, processing times, and application volumes.<sup>10</sup> At these field units and INS headquarters, we discussed application processing procedures, staffing changes, production rates, and application processing times for the period of June 1994 through June 1996. Their comments are not generalizable to other field units. Also, we reviewed an INS report that showed differences in production rates and projected processing times among its field units.<sup>11</sup>

Using INS' methodology, we calculated "production rates" as the number of completed applications divided by the productive processing staff hours for each field unit (district office and service center).<sup>12</sup> This is a measure of how many applications were completed per hour. According to INS guidance, the projected processing time for a particular month is to be calculated by dividing the number of applications pending at month's end by the number of applications completed for the month and multiplying this product by the number of calendar days in the month. This is a projection of how long INS will take to complete action on an application received on the last day of the month if the current month's completion rate is maintained. This is a proxy measure of how long the "wait time" would be from receipt of an application to the completion of its processing, per month. INS used this methodology to calculate projected processing times for selected application types by month over the 25-month period of June 1994 through June 1996.

Since the fall of 1996, reports by us and others and congressional oversight hearings have provided evidence that INS' efforts to reduce backlogs in naturalization application processing resulted in serious internal control and other weaknesses that led to improper naturalization actions in some cases.<sup>13</sup> Reviews of these problems, by ourselves and others, are currently

<sup>9</sup>We met with Assistant District Directors for Examinations and Service Center Directors, except when they suggested that we speak with someone else on their staff.

<sup>10</sup>See app. I for a list of locations we visited.

<sup>11</sup>The data source for this report was the same source that we used for our analysis. INS' report excluded data on returned applications, while we included these data.

<sup>12</sup>Productive processing staff hours do not include staff time spent on any administrative functions (e.g., training, travel, supervision, and record keeping).

<sup>13</sup>Naturalization of Aliens: Assessment of the Extent to Which Aliens Were Improperly Naturalized (GAO/T-GGD-95-51, Mar. 5, 1997); KPMG Peat Marwick LLP. Naturalization Quality Procedures Implementation Review (Washington, D.C.: Apr. 17, 1997); Naturalization of Aliens: INS Internal Controls (GAO/T-GGD-97-57, Apr. 30, 1997); Naturalization of Aliens: INS Internal Controls (GAO/T-GGD-97-98, May 1, 1997).

ongoing. The scope of the work that was undertaken to address our objectives for this report—to determine whether significant differences in production rates and processing times existed among INS' field units—did not include an assessment of whether INS' naturalization processes were being carried out in accordance with INS' policies and procedures.

We conducted our review from March 1996 to April 1997 in accordance with generally accepted government auditing standards. We provided the Attorney General and the INS Commissioner with a draft of this report for their review and comment. The Commissioner provided written comments for the Attorney General, which are discussed and evaluated at the end of this letter. The INS comment letter is reprinted in appendix III. Appendix I provides a more detailed description of our objectives, scope, and methodology. INS also provided separately some technical comments. We discussed these comments with INS officials and agreed on appropriate changes.

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## Variances in Production Rates

Our analyses of INS monthly workload summary data for the period of June 1994 through June 1996 showed that statistically significant differences existed in production rates for each of the five predominant types of applications among INS district offices and service centers. This is consistent with the INS report that also showed differences in production rates among its district offices and among its services centers for fiscal years 1994, 1995, and 1996. In discussing our analyses with INS officials, they pointed out that anomalies in some district offices explain some of the differences. However, INS did not provide any examples of these anomalies.

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## Production Rates Differed Significantly

Our analyses of the production data for district offices and service centers showed that statistically significant differences existed in average production rates by application type (as measured by applications completed per productive hour) for the 25-month period ending June 1996. (See table 3.) See appendix II for a schedule by field unit and application type.<sup>14</sup>

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<sup>14</sup>In our analyses, we compared monthly production rates (completed applications divided by productive hours) by application type for each district office and service center. In this report, we used the 25-month average by application type for each unit. This was done for presentation purposes because of the complexity of the data for 33 district offices and 4 service centers by month, for 25 months, for 5 separate application types.

**Table 3: Range of Average Per Hour Production Rates for INS District Offices and Service Centers for Five Application Types, June 1994 Through June 1996**

Application type	District offices' range		Service centers' range	
	Low	High	Low	High
I-90	0.04	3.94	3.17	6.69
I-130	0.32	1.26	2.85	4.20
I-485	0.32	1.28	a	a
I-765	0.76	4.55	3.11	5.79
N-400	0.35	1.83	a	a

Legend:

I-90 = replacement of alien registration card

I-130 = immigrant visa for alien relative

I-485 = registration for permanent residency or adjustment of status

I-765 = employment authorization

N-400 = naturalization

<sup>a</sup>Generally, the service centers do not adjudicate the I-485 and N-400 applications.

Source: GAO analyses of INS data.

In comparing production rates among district offices for the five application types, some district offices tended to be more productive for all application types, others were comparatively less productive for all application types, while other district offices' production rates varied by application type. For example, one district office had one of the highest production rates for one application type but the lowest production rate for two other application types. Another district office had one of the highest production rates for two application types but the next to lowest rate for another application type.

We also analyzed the production data to determine if either the proportion of naturalization applications and adjustment-of-status applications or the volume of naturalization and adjustment-of-status applications completed by district offices was related to their production rates for these two application types.<sup>15</sup> We did not find a statistically significant relationship. We did find, however, a statistically significant, positive relationship between the production rate for naturalization applications and the production rate for adjustment-of-status applications.<sup>16</sup> That is, district offices with high production rates for naturalization applications also tended to have high production rates for adjustment-of-status applications.

<sup>15</sup>Naturalization and adjustment-of-status applications accounted for about one-half of all completed applications in fiscal year 1996.

<sup>16</sup>For the average production rate for the 33 districts, the Pearson correlation coefficient between the two application types was 0.58 (the probability that the relationship was due to chance was less than 5 percent).

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In other words, we found a tendency for some district offices to have more completions per hour than others for these two application types.

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## INS' Report Containing Production Data Also Showed Variances

According to the INS Benefits Division Production Report, average production rates agencywide for all application types decreased from 1.67 completions per hour in fiscal year 1995 to 1.45 in fiscal year 1996. Across INS, during the same time period, average naturalization application completions increased from 0.66 to 0.84 per hour, while completions of adjustment-of-status applications decreased from 0.74 to 0.70 per hour. The report further stated that, in fiscal year 1996, field units' average production rates ranged from 0.42 to 2.11 completions per hour for all application types combined, from 0.21 to 2.30 completions per hour for naturalization applications, and from 0.30 to 1.88 completions per hour for adjustment-of-status applications. The INS report did not include a statistical analysis of the differences in production rates.

We compared the results of our analyses with the data in INS' report and found that our results were similar to INS' results. Differences in how we aggregated data for analyses caused our figures to differ somewhat from INS' figures, but the overall pattern of differences across district offices is evident in both analyses.<sup>17</sup> INS excluded returned applications, while our analyses of the data included returned applications. According to INS officials, this inclusion would not significantly affect our analyses.

According to INS officials, although INS had not compared the reasons or studied the causes for differing production rates, it has been working to address differences in processing times.

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## Variation in Projected Processing Times

Our analyses of INS workload summary and projected processing time data for the 25-month period ending June 1996 showed that differences existed among district offices concerning projected processing times for the two predominant types of applications.<sup>18</sup> Furthermore, INS' report also showed variances in projected processing times among its district offices.

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<sup>17</sup>INS' report provided data from 65 units, including district offices and suboffices within the district offices. Naturalization data for two units were zero. The data were for fiscal years 1994, 1995, and 1996. For fiscal years 1995 and 1996, INS also reported the data by quarters. Our analyses were done by month for the 25-month period ending June 1996 for the same two application types as well as for the other three major application types.

<sup>18</sup>As with production rates, we used the 25-month average for projected processing times for naturalization and adjustment-of-status applications. This was done for presentation purposes because of the complexity of displaying the data for 33 district offices by month for the 25 months for 2 application types.

## Projected Application Processing Times Differed Significantly Among INS District Offices

Our analyses of projected processing time data for adjustment-of-status and naturalization applications showed that significant differences existed among INS district offices.<sup>19</sup> For example, the projected average processing time for adjustment-of-status applications from June 1994 to June 1996 was 357 days for all district offices combined, with a low of 36 days and a high of 799 days<sup>20</sup> (see table 4).

**Table 4: Average Projected Processing Times for Adjustment-of-Status Applications at 32 District Offices, June 1994 Through June 1996**

INS district office	Number of days
St. Paul, MN	36
Portland, ME	69
Buffalo, NY	102
Cleveland, OH	107
Honolulu, HI	110
Denver, CO	141
Anchorage, AK	147
Baltimore, MD	151
Helena, MT	163
Philadelphia, PA	180
Detroit, MI	197
Dallas, TX	208
Boston, MA	209
Miami, FL	221
Seattle, WA	228
New Orleans, LA	237
Kansas City, MO	244
Atlanta, GA	273
San Antonio, TX	311
Portland, OR	316
Newark, NJ	347
Omaha, NE	348
San Francisco, CA	353
Washington, D.C.	359
Chicago, IL	424

(continued)

<sup>19</sup>Because staff at INS service centers generally did not adjudicate naturalization and adjustment-of-status applications, we did not analyze the processing times for INS' four service centers. Also, data on processing times for other types of applications were not readily available. Therefore, we only analyzed naturalization and adjustment-of-status applications.

<sup>20</sup>We eliminated the Harlingen District Office (Texas) from our computation of INS' average because its reported projected processing time appeared to be an anomaly. Doing further analyses to determine whether the time reported was an anomaly or an error was not practical.

INS district office	Number of days
New York, NY	456
San Diego, CA	504
San Juan, PR	521
Phoenix, AZ	608
El Paso, TX	669
Los Angeles, CA	770
Houston, TX	799
<b>INS average</b>	<b>357</b>

Note: According to INS officials, as part of a pilot of the Direct Mail Program, the Vermont Service Center has been performing the preliminary processing of adjustment-of-status applications in support of the Baltimore District Office. The officials added that this initiative could affect the district office's projected processing times and production rates for this application type.

Source: GAO analyses of INS data.

**For naturalization applications, the average projected processing time from June 1994 to June 1996 was 373 days across all district offices, with a low of 112 days and a high of 678 days. (See table 5.)**

**Table 5: Average Projected Processing Times for Naturalization Applications at 32 District Offices, June 1994 Through June 1996**

INS district office	Number of days
Portland, ME	112
Buffalo, NY	130
Baltimore, MD	138
Washington, D.C.	140
Anchorage, AK	159
Cleveland, OH	167
St. Paul, MN	170
Helena, MT	171
Kansas City, MO	185
Philadelphia, PA	188
San Antonio, TX	196
Portland, OR	196
Honolulu, HI	218
New Orleans, LA	259
New York, NY	261
Atlanta, GA	265
Omaha, NE	265
Boston, MA	274
Denver, CO	287

(continued)

<b>INS district office</b>	<b>Number of days</b>
San Diego, CA	294
El Paso, TX	295
Harlingen, TX	308
Newark, NJ	331
San Juan, PR	339
Seattle, WA <sup>a</sup>	344
Los Angeles, CA	369
Detroit, MI	379
Dallas, TX	455
Chicago, IL	526
San Francisco, CA	552
Miami, FL	578
Houston, TX	615
Phoenix, AZ	678
<b>INS average</b>	<b>373</b>

<sup>a</sup>An official in the Seattle District Office said that its processing time for naturalization applications did not exceed 196 days. According to the official, the difference between the average data INS and we used and its data resulted from the fact that INS and we used a formula (which is a proxy on the basis of the aggregate flow of applications) to calculate average projected processing times, whereas the Seattle District Office used the actual processing times spent to complete individual naturalization applications each month. We did not verify Seattle's calculation.

Source: GAO analyses of INS data.

To determine whether a statistical relationship existed between production rates and projected processing times, we analyzed data for adjustment-of-status and naturalization applications for all district offices that completed at least 100 of either type of application per month during the 25-month period ending June 1996.<sup>21</sup> We found no significant relationship between production rates and projected processing times among the district offices.<sup>22</sup>

<sup>21</sup>To detect a possible relationship between the two application types, we needed a sufficient number of completed applications. On the basis of our review of the data, 100 completed applications per month were adequate for our purpose—29 and 30 district offices had completed an average of 100 naturalization and 100 adjustment-of-status applications per month, respectively. At the time of our review, data from the New York District Office were not available. Because of data problems, we excluded the Harlingen District Office (Texas).

<sup>22</sup>The Pearson correlation coefficient was less than 0.1 (with a probability greater than 0.8).

## INS' Report Containing Timeliness Data Showed Variances

According to the INS Benefits Division Production Report, during fiscal year 1996, the average projected processing times of reporting field units for completing all types of applications ranged from 45 days to 296 days. The average projected processing time for naturalization applications ranged from 22 days to 383 days. According to the INS report, 53 percent of its reporting field units had average projected processing times for their naturalization applications of less than or equal to 183 days (6 months), which was INS' processing goal. The projected processing times for the field units to complete adjustment-of-status applications ranged from 38 days to 998 days. Twenty-eight percent of the field units completed processing of adjustment-of-status applications within 122 days (4 months), which was INS' processing goal. As in the case of INS' production data, its projected processing time data were consistent with our analyses.<sup>23</sup>

## Possible Reasons for Differences in Production Rates and Processing Times

To identify factors that may have contributed to the differences in production rates and processing times, we met with officials at INS headquarters, nine district offices, and two service centers.<sup>24</sup> Generally, these officials' comments focused on the data used to compare the field units' rates and times, as well as on other factors that may have affected the units' production and timeliness. With the exception of comparability of data issues, we were not able to gain insight into the extent to which these factors actually affected the production rates and processing times. Such an assessment would require a more thorough review and analysis of the field units' procedures and practices for processing applications than we could complete within a reasonable period of time.

In our discussions about factors that the officials said could have affected differences in production rates and processing times, the issues they identified tended to be interrelated. Therefore, in the following discussion, we do not separate production rate and processing time issues.

## Data May Affect Comparisons of Field Units

INS officials in certain field units said that our comparisons of field units' production rates and projected processing times could be affected by two data-related factors.

<sup>23</sup>The same previously discussed reasons explain the differences between INS' report and our analyses.

<sup>24</sup>Before meeting with these officials, we provided them with our analyses of production rates and projected processing times.



- The first factor was the possibility of inaccuracies in the data reported by other field units. For example, officials in two field units were concerned that other field units may not have accurately reported their production data. However, none of the field units we visited identified problems associated with its own production data. Furthermore, many of the officials told us that they reviewed and corrected their units' production data before sending the data to their respective regional offices or INS headquarters.
- The second factor, which was cited by several district offices at the time of our visit, was inconsistency in defining the point when approved naturalization applications were considered completed. For example, five of the nine district offices we visited considered an approved naturalization application completed after the naturalization interview, and at that point, the district offices would approve the application. The other four district offices considered an approved naturalization application completed only after the alien was sworn in as a naturalized citizen.<sup>25</sup> We agree with INS that the differences in production rates and processing times could be partly attributed to this inconsistent definition. However, as shown in table 6, our analyses indicated that differences existed in the production rates of the four districts that considered the naturalization ceremony the point of completion, as well as among the five district offices that considered the interview the point of completion.

**Table 6: Ranges of Average Production Rates and Projected Processing Times for the Nine INS District Offices Broken Out by When in the Process Naturalization Applications Were Considered Completed, June 1994 Through June 1996**

Naturalization complete	Per hour production rate		Projected processing time in days	
	High	Low	High	Low
After ceremony	1.34	0.82	615	185
After interview	1.83	0.56	455	130

Source: GAO analyses of INS data.

As shown in table 7, wide variances also existed among these district offices' per hour production rates for the four types of applications, other than those for naturalization.

<sup>25</sup>According to INS officials, INS now requires its field units to consider a naturalization application completed after the naturalization ceremony. The five district office officials said that they are now following this requirement.

**Table 7: Range of Average Per Hour Production Rates for the Nine INS District Offices for Four Application Types, June 1994 Through June 1996**

Application type	District offices' range	
	Low	High
I-90	0.10	3.94
I-130	0.32	1.26
I-485	0.37	1.28
I-765	0.76	3.78

Legend:

I-90 = replacement of alien registration card

I-130 = immigrant visa for alien relative

I-485 = registration for permanent residency or adjustment of status

I-765 = employment authorization

Source: GAO analyses of INS data.

Regarding the nine district offices' projected processing times, data were readily available for adjustment-of-status applications but not for other application types. The nine district offices' projected processing times for adjustment-of-status applications also varied widely, ranging from 102 days to 799 days.

INS headquarters officials were aware of concerns that field units had about the data we used for our analyses. However, they pointed out that the data were the best available and were used by INS for budgeting and management purposes, such as in INS' previously mentioned Benefits Division Production Report. In addition, INS uses the same data for its report to Congress on the status of adjudications and naturalization processing.

## Other Factors That May Affect Production Rates and Processing Times

During our visits to field units, INS officials identified several factors that they believed may affect production rates and processing times. They pointed out that, in any such work process, an interrelationship exists among many factors that may affect both production rates and processing times. We agree and generally did not verify whether or to what extent the following factors actually affected production rates or processing times.

- An official from one district office said that it must rely on the courts to conduct naturalization ceremonies, which can delay the naturalization dates and, therefore, increase the time spent to complete applications. An official from another district office said that his office conducted the naturalization ceremony on the same day the application was approved, thereby shortening processing times.

- According to officials in two district offices, aliens' naturalization applications tended to be more accurately completed when aliens received assistance from community-based service organizations. As a result, according to these officials, INS officers were able to process these applications more quickly.
- According to eight field unit officials, district offices have varying degrees of automation. For example, one district office developed a computerized tracking system to enhance the recording and processing of adjustment-of-status applications. According to officials in this district, other districts have requested and started to use this system to enhance their adjustment-of-status application processing.<sup>26</sup>
- According to district office officials, in four district offices, adjudications staff specialized in certain application types, while in the other five district offices, adjudications staff performed as generalists, processing all types of applications.
- According to INS officials at one field unit, the mix of applications (i.e., the proportion of application types) that field units receive affects their processing times. These officials added that, if a field unit receives a larger percentage of applications that take longer to process, its average processing times for all types of applications would be longer relative to other field units.
- According to INS officials we visited, staffing at the district offices has varied. While some district offices have been staffed at or above their authorized levels, other offices have lost staff on a temporary basis to larger offices. These officials added that the experience level of the adjudication staff differs across INS. They said INS had recently hired new staff, and the new hires are generally not as efficient as the more experienced staff.
- According to officials we visited, some INS district offices rely on outside testing agencies to conduct naturalization examinations, while other offices conduct their own examinations. According to the officials, the use of outside testing agencies may improve timeliness.
- According to officials in three district offices, authorized increases in overtime hours above their budget enabled their offices to reduce processing times.

## Conclusions

Our analyses showed that the production rates among the district offices and among service centers varied significantly for the five application types we analyzed. We did not find a relationship between production rates and the mix of applications received or the volume of completed

<sup>26</sup>At the time of our review, this system was not being used agencywide.

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applications. Furthermore, the projected processing times of naturalization and adjustment-of-status applications differed among the district offices. We found no significant relationship between production rates and projected processing times among the district offices. An INS report covering approximately the same time period also showed variations in projected production rates and projected processing times among its district offices. INS has not identified reasons for these variations.

We did not attempt to assess the extent to which specific practices or circumstances caused the differences in production rates and processing times among field units. However, our analyses of production rates and projected processing times for the nine district offices we visited, along with the fact that the field officials also provided other reasons, seem to indicate that factors other than data quality problems, at least in part, may have contributed to the variation. Data quality, specifically definitional issues, however, could have contributed to differences across field units.

The production rates of district offices and service centers are important because of the significant growth in the number of applications that INS has received over the past several years. This growth has placed greater demands on INS as it attempts to process these applications within reasonable time frames. Our comparisons among field units show that significant differences exist in their production rates; thus, opportunities may exist to improve the production rates of some of the units.

Aliens pay the same fees for the various applications at all INS offices; however, the length of time that aliens wait for their applications to be completed has varied widely from field unit to field unit. This raises a fairness issue in that the length of time aliens have to wait for their applications to be processed varies according to the INS office at which they apply.

Determining the reasons for the differences in, or methods for improving, production or timeliness were outside the scope of this review. Because INS has in-depth knowledge of its field operations and its application processing procedures, it is in the best position to pursue the causal factors that may be contributing to higher production in some field units. The identification of these factors can be important because they may relate to opportunities for improved efficiencies at all field units.

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## Recommendations to the Attorney General

We recommend that you direct the INS Commissioner to periodically determine and assess the production rates and processing times in the INS field units. The Commissioner should first ensure that the field units are consistently reporting the data used to calculate the rates and times. After ensuring that data are consistently reported, including using the same definitions, the Commissioner should (1) analyze the production rates and processing times for each field unit by application type, (2) identify factors that contribute to making the field units more or less productive and timely, (3) determine whether and what changes could be made to make individual field units more productive and timely, and (4) follow up with the field units to ensure that appropriate changes are implemented.

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## Agency Comments and Our Evaluation

In an April 22, 1997, letter, the INS Commissioner provided comments on a draft of this report (see app. III). Although not specifically commenting on our recommendations in its letter, INS officials, including the Associate Commissioner for Examinations, in a meeting on March 18, 1997, said that they agreed with our recommendations.<sup>27</sup> However, the Commissioner said that our draft led the reader to believe that our overall conclusions were based on scientific analyses when, in her view, they were based simply on unvalidated testimonial and anecdotal information.

We disagree with INS that our analyses and conclusions were not scientifically based. We analyzed the production rates using standard statistical techniques to determine if the differences between field units by application type were significant. Our analyses showed that significant differences existed. We then examined other factors that might be related to the differences in the production rates such as processing times, mix of application types, and volume of application types. However, we recognized as a result of INS' comment that additional information about our methodology would be beneficial to a reader. Accordingly, we added additional information to this report to clarify the statistical analyses we performed.

INS also said that the data in our draft were suggestive and not conclusive and that the report provided very little information to help it better understand the problem. Therefore, INS believes that our work further demonstrates the need for it to continue its efforts to improve data integrity. INS added that one of its priorities is to revise its workload

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<sup>27</sup>At this meeting, INS provided technical comments, which were incorporated in this report where appropriate.

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reporting process, including standardizing the definitions and methods of data collection.

As discussed in this report, we agree that the data we analyzed do not provide conclusive reasons for the differences in production rates and processing times within the nine field offices. Our objectives for this review did not include determining actual causes for the differences.

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This report contains recommendations to you. As you know, the head of a federal agency is required by 31 U.S.C. 720 to submit a written statement on actions taken on these recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Reform and Oversight not later than 60 days after the date of the report. A written statement also must be sent to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Chairmen and Ranking Minority Members of interested congressional committees; the INS Commissioner; the Director, Office of Management and Budget; and other interested parties. Copies will also be made available to others upon request.

Major contributors to this report are listed in appendix IV. If you have any questions about this report, please contact me on (202) 512-8777.

Sincerely yours,

A handwritten signature in black ink, reading "Norman Rabkin". The signature is fluid and cursive, with the first name "Norman" and last name "Rabkin" clearly distinguishable.

Norman J. Rabkin, Director  
Administration of Justice Issues



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**Abbreviations**

INS	Immigration and Naturalization Service
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# Objectives, Scope, and Methodology

Because of the large volume of applications and indications of differences in processing times across INS field units, we initiated a review under our basic legislative authority to determine if significant differences in production rates and processing times existed among INS' field units in application processing. Because we found differences, we also asked officials at the nine district offices and two service centers that we visited what factors they believed could have caused the differences. We did not attempt to do the more detailed analyses that would be necessary to determine actual causes.

To determine the production rates for each type of application in the INS district offices and service centers, we obtained the monthly adjudications workload summary reports (G-22.2 and G-22.3 reports, dated January 31, 1997) from INS headquarters covering the 25-month period from June 1994 through June 1996. These monthly reports provided information, by district office and application type, on (1) the number of applications received and completed, as well as the ending (pending) balances; and (2) the productive hours of the adjudications staff. For each office, we then calculated average monthly production rates for each application type by dividing the applications completed by the productive hours spent on adjudications.

The reports do not include contractor hours for processing applications and records management at the field units. During our discussions with field unit officials, they did not mention contractor hours as a factor affecting the differences in production rates or processing times. Since the INS reports did not contain contractor hours, we could not analyze the effect that contractor hours may have had on production rates or processing times.

To better understand how production compared across INS field units, we analyzed the production rates for the five major types of applications separately. According to INS data, the five application types that were processed most frequently were the replacement of alien registration card (I-90), immigrant visa for alien relative (I-130), registration for permanent residency or adjustment of status (I-485), employment authorization (I-765), and naturalization (N-400). These five application types accounted for about 97 percent of all completed applications for June 1996. We compared the rates for each application type only with those for the same type of field unit. For example, the production rates for employment authorization applications at district offices were compared with those at other district offices but not with those at service centers. According to

INS, the application review processes are different in the two types of field units.

To determine whether a relationship existed between production rates and projected processing times, we analyzed data for adjustment-of-status and naturalization applications for all district offices that completed at least 100 of either type of application per month during the 25-month period ending June 1996. To determine whether a relationship existed between the two application types, we needed a sufficient number of completed applications. On the basis of our review of the data, 100 completed applications per month was adequate for our purpose. We also analyzed the production data to determine whether the mix of naturalization and adjustment-of-status applications received (i.e., proportion of application types at a district office) or the volume of naturalization and adjustment-of-status applications completed by district offices, was related to their production rates.<sup>1</sup> Specifically, we performed three statistical analyses.

- Our analysis of the variation in monthly production rates showed a statistically significant difference (probability that the relationship was due to chance was less than 5 percent) between district office average production rates. We analyzed data from June 1994 through June 1996 for the 33 districts for the 5 predominant types of applications processed by the district offices and 3 types for service centers. This result led to several other analyses to attempt to determine what factors might be related to production rates.
- We compared production rates and projected average processing times to see if a statistically meaningful relationship existed between the two. That is, we wanted to know if districts with high production rates also generally had shorter projected average processing times than districts with lower production rates, or whether the inverse was true. We analyzed data for adjustment-of-status and naturalization applications for all district offices that completed an average of at least 100 applications per month during the 25-month period. We did not find a significant relationship (the Pearson correlation coefficient was less than 0.1 with a probability due to chance greater than 80 percent).
- We also analyzed adjustment-of-status and naturalization applications to see if either the volume of applications processed or the mix of applications processed was related to the production rate. Volume was measured by the average number of completions per month for the two

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<sup>1</sup>Naturalization and adjustment-of-status applications accounted for about one-half of all completed applications in fiscal year 1996.

application types, and mix was measured by the ratio of applications completed for one application type divided by applications completed for all other application types. We did not find a statistically meaningful relationship among these factors. We did, however, find a statistically significant, positive relationship between the production rate for naturalization applications and the production rate for adjustment-of-status applications (Pearson correlation coefficient equaled 0.58, with a probability that the relationships was due to chance of less than 5 percent). That is, districts with high production rates for one application type tended to have high production rates for the other application type.

Finally, while we did not verify the accuracy of the adjudications data received from INS, we obtained the comments of INS officials in field units and headquarters on how data for the monthly adjudications workload summary reports and productive hours are accumulated, as well as what checks are performed to ensure the quality and accuracy of the data. These officials raised questions about the reporting of productive hours and the definition of naturalization application completions. Accordingly, we performed additional analyses of the data in an effort to determine their validity.

To analyze applications' processing times, we gathered processing time reports (also called "aging reports") from INS headquarters covering each district office for the same 25-month period—June 1994 through June 1996. Processing time data were not readily available for the service centers. We focused our analyses on the naturalization and adjustment-of-status applications because these were the only applications for which INS collects timeliness data. Further, INS has made these application types its highest priority for adjudication and the INS Commissioner has set specific processing time goals for these two types of applications. As with the production rate data, at each INS office we visited we also obtained the comments of INS field and headquarters officials on the accuracy of the processing time data and what factors affect the usefulness of the data.

To determine the reasons for the differences in production rates and projected processing times, we selected and visited 9 of INS' 33 district offices and 2 of its 4 service centers. On the basis of our analyses of the production data provided by INS, we selected five of the relatively more productive district offices—Dallas, TX; El Paso, TX; Houston, TX; Omaha, NE; and Seattle, WA—and four of the relatively less productive district

offices—Baltimore, MD; Buffalo, NY; Kansas City, MO; and Los Angeles, CA—to visit. In addition, as part of our selection criteria, we factored in the relative volume of applications received and applications' projected processing times. The service centers we visited were the California Service Center (Laguna Niguel, CA) and the Texas Service Center (Irving, TX). These two service centers were chosen primarily on the basis of their proximity to the selected district offices we visited.

At each field unit, we gathered data on how production and processing time data were collected and what checks were in place to ensure the data's accuracy. Generally, we met with Assistant District Directors for Examinations and Service Center Directors, except when they suggested that we meet with someone else on their staff. We discussed the unique characteristics of the various field units we visited and what role these characteristics may have played in affecting production rates and the timeliness of adjudications. Finally, we discussed the policies and procedures used by the field units we visited. Their comments are not generalizable to other field units.

INS processes asylum applications at eight offices nationwide. Because they are not processed at the district offices and service centers, we excluded these applications from our review.

In the report, we present average processing and timeliness data for the 25-month period. This was done for presentation purposes. Our analyses were done for each application type, by unit, and by month. We did the analyses by month because using averages over 25 months could hide differences. We performed our work between March 1996 and April 1997 in accordance with generally accepted government auditing standards.

# INS Field Units' Average Production Rates and Average Completions by Application Type for the 25-Month Period Ending June 1996

**Table II.1: INS District Office Average Per Hour Production Rates and Average Monthly Completions by Application Type for the 25-Month Period Ending June 1996**

District office	I-765 rate	I-765 completions	N-400 rate
Anchorage, AK	2.74	20	0.57
Atlanta, GA	4.55	587	0.84
Baltimore, MD	0.76	96	1.09
Boston, MA	4.39	1,358	0.73
Buffalo, NY	2.10	260	0.56
Chicago, IL	3.81	1,541	0.74
Cleveland, OH	1.95	338	0.94
Dallas, TX	3.09	634	0.97
Denver, CO	2.22	351	0.86
Detroit, MI	1.51	289	0.94
El Paso, TX	3.06	337	1.83
Harlingen, TX	3.00	310	0.66
Helena, MT	1.43	67	0.40
Honolulu, HI	1.99	261	0.45
Houston, TX	2.78 <sup>c</sup>	437	1.18
Kansas City, MO	1.96	326	0.82
Los Angeles, CA	2.04	896	1.12
Miami, FL	2.29	4,174	0.88
New Orleans, LA	2.04	354	0.65
New York, NY	2.59	4,385	0.74
Newark, NJ	1.81	1,143	1.59
Omaha, NE	3.23	289	1.10
Philadelphia, PA	2.51	447	0.65
Phoenix, AZ	3.77	740	0.60
Portland, ME	1.34	43	0.35
Portland, OR	1.89	277	0.93
San Antonio, TX	3.24	556	0.78
San Diego, CA	2.06	713	0.74
San Francisco, CA	2.63	2,832	0.57
San Juan, PR	1.80	238	0.37
Seattle, WA	3.78	501	1.34
St. Paul, MN	4.11	294	0.53
Washington, D.C.	3.14	911	0.79

**Appendix II**  
**INS Field Units' Average Production Rates**  
**and Average Completions by Application**  
**Type for the 25-Month Period Ending June**  
**1996**

<b>N-400</b> <b>completions</b>	<b>I-130</b> <b>rate</b>	<b>I-130</b> <b>completions</b>	<b>I-90</b> <b>rate</b>	<b>I-90</b> <b>completions</b>	<b>I-485</b> <b>rate</b>	<b>I-485</b> <b>completions</b>	<b>Other</b> <b>forms' rate<sup>a</sup></b>	<b>Other forms'</b> <b>completions<sup>a</sup></b>
85	0.88	26	0.31	<sup>b</sup>	0.41	36	0.07	3
1,212	0.91	336	1.79	33	0.64	772	0.07	42
1,384	0.32	216	0.28	1	0.37	468	0.05	40
2,086	0.68	517	0.74	7	0.73	1,010	0.04	45
415	1.13	556	0.17	7	0.41	192	0.15	201
3,200	0.74	537	0.24	1	0.74	1,304	0.07	51
537	0.59	158	0.71	9	0.71	320	0.07	23
1,153	0.93	249	1.56	8	1.03	894	0.04	17
565	1.05	210	0.04	1	0.88	506	0.04	15
721	0.54	152	2.17	132	0.79	398	0.02	16
1,277	1.26	79	0.48	2	1.28	341	1.11	1,563
442	0.69	70	0.42	173	0.47	152	0.46	503
67	0.60	140	0.37	2	0.41	72	0.05	29
532	0.83	305	2.04	45	0.32	247	0.08	52
1,383	1.10	186	2.88	31	0.62	630	0.08	31
416	0.37	118	0.10	1	0.49	226	0.04	15
13,750	0.55	966	2.19	2	0.51	2,628	0.05	194
5,048	0.83	1,060	0.25	27	0.47	2,331	0.03	60
631	0.68	170	0.90	39	0.50	375	0.04	21
9,575	0.47	1,390	0.26	4	0.59	3,239	0.11	395
3,086	1.03	429	0.79	40	0.64	1,562	0.04	34
184	0.99	74	3.94	75	1.06	138	0.02	2
869	0.79	283	1.27	4	0.52	518	0.09	30
928	0.71	192	1.51	665	0.47	524	0.39	751
113	0.43	38	0.10	3	0.43	50	0.01	5
349	1.14	108	1.50	<sup>b</sup>	0.82	236	0.06	9
807	0.65	179	0.74	203	0.84	473	0.63	670
1,495	0.68	101	1.31	356	0.65	343	0.66	1,510
5,730	0.71	740	0.86	167	0.52	1,836	0.03	48
321	0.90	187	0.12	2	0.58	237	0.07	21
1,171	0.79	259	0.42	29	0.85	537	0.06	64
419	1.03	631	0.41	11	0.50	254	0.04	16
1,360	0.74	337	1.48	30	0.50	713	0.14	69

**Appendix II**  
**INS Field Units' Average Production Rates**  
**and Average Completions by Application**  
**Type for the 25-Month Period Ending June**  
**1996**

<sup>a</sup>The other application types ("other forms") represented a small volume of applications, and therefore we did not analyze them separately or as a group.

<sup>b</sup>Less than one completion per month on average.

<sup>c</sup>The Houston data for March 1996 seemed to contain an error (547 completions per hour). Rather than attempt to determine the actual number of completions and productive hours for March, we eliminated the March data. If we had included the March data, Houston's average production rate would have been 24.59 completions per hour.

Source: GAO analysis of INS data.

**Table II.2: INS Service Center Average Per Hour Production Rates and Average Monthly Completions by Application Type for the 25-Month Period Ending June 1996**

Service center	I-765 rate	I-765 completions	I-130 rate	I-130 completions	I-90 rate	I-90 completions	Other forms' rate <sup>a</sup>	Other forms' completions <sup>a</sup>
California	4.28	15,434	4.20	14,357	5.31	16,009	0.22	1,356
Nebraska	4.02	5,125	2.85	6,349	4.09	5,708	0.41	3,453
Texas	5.79	12,842	4.14	11,218	6.69	10,394	0.72	2,090
Vermont	3.11	14,238	3.07	13,905	3.17	10,697	0.28	2,028

Note: The other application types ("other forms") represented a small volume of applications, and therefore we did not analyze them separately or as a group. Generally, the service centers do not process the N-400 and I-485. The N-400 and I-485 are not included with the other forms.

Source: GAO analysis of INS data.



# Comments From the Commissioner, Immigration and Naturalization Service

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



U.S. Department of Justice  
Immigration and Naturalization Service

HQOIA 110/8.1-C

Office of the Commissioner

425 I Street NW  
Washington, DC 20536

APR 22 1997

See comment 1

Mr. Norman J. Rabkin  
Director, Administration of Justice Issues  
United States General Accounting Office  
Washington D.C. 20548

Dear Mr. Rabkin:

We appreciate the opportunity to provide written comments to the draft report: "ALIEN APPLICATIONS: Variances Among INS Field Units." In previous meetings, we had provided you with specific corrections and comments. These addressed the accuracy of the facts and terminology presented, as well as concerns we had that conclusions made in the draft did not flow from the facts presented. We also asked that you incorporate a description of the analytical design used for the statistical analysis of Immigration and Naturalization Service (INS) data, and add a technical appendix containing the main statistical tabulation to support conclusions in the draft report. We appreciate your expressed willingness to make these changes to the report. We believe the changes will assist readers and scholars for years to come.

We still have several concerns. Your stated review objectives were to determine if significant differences in production rates and processing times existed among INS' field units in application processing. Your review of existing INS Benefits Production Reports demonstrated that variation exists among INS offices. Your next step was to talk with staff from nine offices to determine causes for the differences. The draft report clearly states that you did not attempt to do more detailed analyses that would be necessary to determine actual causes of the variation. Despite this disclaimer, the report attempts to argue that the variations among offices are statistically significant. The reader is led to believe that overall conclusions in the report are the result of a rigorous methodological approach, when, in fact, the report is based simply on testimonial and anecdotal information. Therefore, we believe that the data in the report are suggestive and not conclusive.

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**Appendix III**  
**Comments From the Commissioner,**  
**Immigration and Naturalization Service**

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Page 2

Mr. Norman J. Rabkin

The overall results of the General Accounting Office's (GAO) work does demonstrate the need for the INS to continue its efforts in improving data integrity. One of the INS FY 1997 priorities is to improve the quality and reporting of data, including the revision of the workload reporting process. Specific changes will include standardizing the definitions and methods of collecting the data. Although the GAO draft report alludes to this as a problem and suggests that GAO had gathered data on how production and processing time data was collected and what checks were in place to ensure the data's accuracy, very little information was provided in the report to help the INS better understand the problem. We believe the report would be stronger and more useful if the findings were more fully documented and analyzed than what the current draft contains.

The INS continues to be committed to collecting and analyzing accurate workload data to facilitate management oversight of and improvements in overall processing. I would welcome future reviews that provide substantive suggestions to improve the INS' operations.

Sincerely,

  
Doris Meissner  
Commissioner

cc: Vickie Sloan, DOJ Audit Liaison

---

The following are GAO's comments on the Immigration and Naturalization Service's April 22, 1997, letter.

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## **GAO's Comments**

1. INS said that the overall results of our work alluded to problems related to data. It pointed out that we gathered information on how production and processing time data were collected and what checks were in place to ensure data accuracy but added that we provided little information to help INS understand the problem. To identify what INS believed were the potential causes for the differences in production rates and processing times, we asked field unit officials among other things about any steps that they may have taken regarding the checks that are performed to ensure the quality and accuracy of data. They pointed out that they had concerns that other field units may not have accurately reported their production data, but many of the officials told us they reviewed their unit's data. We agree that we did not perform any detailed analysis regarding data accuracy.

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