



Section 4103 Plan Pursuant to the Emergency Stopgap USCIS Stabilization Act

September 7, 2021

Fiscal Year 2021 Report to Congress



**Homeland
Security**

U.S. Citizenship and Immigration Services

Message from the Secretary

I am pleased to present the following “Section 4103 Plan Pursuant to the Emergency Stopgap USCIS Stabilization Act.” prepared by U.S. Citizenship and Immigration Services (USCIS).

This document has been compiled pursuant to a requirement in the Emergency Stopgap USCIS Stabilization Act, which was incorporated in the Continuing Appropriations Act, 2021 and Other Extensions Act, Pub. L. No. 116-159.

As required by statute, this report is being provided to the following Members of Congress:



The Honorable Lucille Roybal-Allard
Chairwoman, House Appropriations Subcommittee on Homeland Security

The Honorable Chuck Fleischmann
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Shelly Moore Capito
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jerrold Nadler
Chairman, House Committee on the Judiciary

The Honorable Jim Jordan
Ranking Member, House Committee on the Judiciary

The Honorable Dick Durbin
Chairman, Senate Committee on the Judiciary

The Honorable Chuck Grassley
Ranking Member, Senate Committee on the Judiciary

The Honorable Bennie G. Thompson
Chairman, House Committee on Homeland Security

The Honorable John Katko
Ranking Member, House Committee on Homeland Security

The Honorable Gary C. Peters
Chairman, Senate Committee on Homeland Security and Governmental Affairs

The Honorable Rob Portman
Ranking Member, Senate Committee on Homeland Security and Governmental
Affairs

If you have any questions, please do not hesitate to contact the DHS Office of Legislative Affairs at (202) 447-5890 or the Department's Acting Chief Financial Officer, Stacy Marcott, at (202) 447-5751.

Sincerely,



Alejandro N. Mayorkas
Secretary

Executive Summary

Section 4103 of the Emergency Stopgap USCIS Stabilization Act, Title I, Div. D of Public Law (P.L.) 116-159 (8 U.S.C. 1103 note) requires that the Secretary of Homeland Security provide a 5-year plan to enable electronic filing for all applications and petitions for immigration benefits, accept electronic payments at all filing locations, issue correspondence electronically, and improve processing times for all immigration and naturalization benefit requests.

This report describes how USCIS plans to meet these requirements.

USCIS has made significant progress toward establishing fully electronic filing and digital processing capabilities, including the current capability to:

- Process 100 percent of citizenship benefit requests electronically;
- Receive 34 percent of all applications, petitions, and requests for benefits, including the related payments, electronically; and
- Process 69 percent of its case workload electronically.

Progress over the last few years provides USCIS with the expertise to plan and implement the governance, execution, resource management, and monitoring activities necessary to achieve the goals set forth by Congress.

USCIS has instituted a governance structure that solicits input from leaders across the Agency to consolidate priorities, increase collaboration, eliminate redundancies, make resource decisions, and administer oversight of the Agency's Information Technology development and investments. The USCIS Chief Information Officer (CIO) chairs the newly established Information Technology Steering Committee (ITSC), under the direction of the Executive Coordination Council (ECC) and is charged with implementing its decisions. The Component Acquisition Review Board (CARB) is the oversight body that monitors cost, schedule, and performance for the Agency.

USCIS has developed a prioritization framework to align the Section 4103 Plan with critical Agency priorities. Projects that are highly executable, provide business value, and drive measurable impact for customers, partners, and the Agency receive priority. The governance structure combined with the development framework ensures flexibility, leveraging of existing capabilities, increased development cycles and implementation. As the Agency shifts to a fully electronic posture, it will realize efficiencies and should improve processing times.

USCIS has developed a 5-year project schedule leading to a goal of complete electronic capability by Fiscal Year 2026. It is important to note that despite USCIS' continued expansion of electronic filing capabilities, customers are still often choosing paper as their preferred method to submit applications, petitions, and requests for benefits. In FY 2020, of the total population of filings that USCIS was capable of receiving electronically, approximately 1.5 million paper filings were received at the Lockboxes and approximately 1.2 million were filed online. The

digitization process that happens at the Lockboxes ensures equitable service delivery between those that file online and those that file in paper. While USCIS incurs significant costs to digitize the paper filings for electronic processing, it allows for greater efficiencies in case processing. USCIS anticipates paper filing will continue at significant levels absent incentives to adopt online filing. USCIS will continue to support intake of paper filings and work to improve the customer experience for those that choose paper.

To meet Congress' expectations of improved processing times, customers must be positioned with the necessary tools, services, and understanding to participate and take advantage of the electronic filing process. USCIS is working on initiatives to incentivize public adoption of electronic filing such as policy changes, rulemaking, marketing strategies, and increased outreach and education opportunities with stakeholders.

Continuing to transition immigration benefits processing from a paper-based to an electronic process will enable USCIS to better meet the needs of its customers, its stakeholders, and the Nation.

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I. Legislative Requirement

This report fulfills the requirement set forth in Section 4103 of the Emergency Stopgap USCIS Stabilization Act, Title I, Div. D of Public Law 116-159, that the Secretary of Homeland Security provide a 5-year plan to digitize the processing of immigration benefits.

SEC. 4103. REPORTING REQUIREMENTS.

(a) **IN GENERAL.**—Not later than 180 days after the date of the enactment of this Act, the Secretary of Homeland Security shall provide to the appropriate Committees a 5-year plan, including projected cost estimates, procurement strategies, and a project schedule with milestones, to accomplish each of the following:

- (1) Establish electronic filing procedures for all applications and petitions for immigration benefits.
- (2) Accept electronic payment of fees at all filing locations.
- (3) Issue correspondence, including decisions, requests for evidence, and notices of intent to deny, to immigration benefit requestors electronically.
- (4) Improve processing times for all immigration and naturalization benefit requests.

(b) **SEMI-ANNUAL BRIEFINGS.**—Not later than 180 days after submission of the plan described in subsection (a), and on a semiannual basis thereafter, the Secretary shall advise the appropriate Committees on the implementation status of such plan.

(c) **APPROPRIATE COMMITTEES DEFINED.**—In this section, the term “appropriate Committees” means—

- (1) the Committee on Appropriations, the Committee on the Judiciary, and the Committee on Homeland Security of the House of Representatives; and,
- (2) the Committee on Appropriations, the Committee on the Judiciary, and the Committee on Homeland Security and Governmental Affairs of the Senate.

II. Background

U.S. Citizenship and Immigration Services (USCIS) receives applications, petitions, and requests for benefits which are categorized within four Lines of Business (LOB):

- Citizenship: Persons applying for naturalization, Certificate of Citizenship, and all other citizenship related benefits.
- Humanitarian: Refugee, asylum, parole, Temporary Protected Status, deferred action, and other protections.
- Immigrant: Lawful Permanent Residents, employment-and family-based adjustment of status, and immigrant investors.
- Nonimmigrant: Student, visitor, and employment-based nonimmigrants.

Of the four LOB, the Citizenship¹ LOB is complete for end-to-end electronic processing (i.e., from application submission to decision). The Citizenship LOB represents approximately 8 percent of the total USCIS case workload. Even though the capability exists to process immigration benefits within the Citizenship LOB electronically, not all applicants are taking full advantage of this service. For example, in FY 2020 approximately 49 percent of applicants choose to file their N-400, Application for Naturalization, online and 51 percent continue to file the paper form via mail.

USCIS encourages applicants to file electronically either with a computer or on a mobile device; however, USCIS does not require customers to create an online account and file electronically. For some with limited access to computers or broadband access, requiring electronic filing could unnecessarily reduce access to USCIS services. In addition to allowing for post filing electronic communication between USCIS and its customers, there are other benefits to creating an online account, such as the ability to track the status of a benefit request. USCIS is beginning to explore promising areas of analysis that may show differences in processing or customer experience between online filing and paper filing, such as response time to requests for evidence that are sent electronically versus in paper.

In Fiscal Year 2019, the External Affairs Directorate Communications Working Group for Online Filing Promotion was established to ensure information sharing and coordination across the organization on activities to expand and improve the online experience and promote the use of the USCIS account and its key features, including filing an immigration form online. Subgroups have been established to focus on areas of importance such as targeting outreach and promotion of USCIS' online services and tools in certain areas, assessing the value of educational tools to applicants and legal representatives when filing forms online, and exploring methods to reduce barriers to our services. In June 2020 and March 2021, the working group conducted focus groups of applicants and legal representatives (including recognized organizations) to better understand their challenges with adoption of the USCIS online account,

¹ Within the Citizenship LOB, there are four forms that are not available for online filing. Due to minimal filing volumes, the Agency has determined these forms do not merit prioritizing the resources required to offer electronic filing or processing.

online filing, and the potential of third-party software integration. The USCIS Office of Information Technology among other offices within the Agency participate in the working group to be able to incorporate feedback into future technical development and prioritization.

USCIS also has statutory authority to offer what is known as premium processing, which is completed primarily for certain employment-based petitions within the Nonimmigrant and Immigrant LOB. Premium processing provides expedited processing for Form I-129, Petition for a Nonimmigrant Worker, and Form I-140, Immigrant Petition for Alien Workers. Specifically, USCIS guarantees processing within 15 calendar days for those who choose to use this service, or it will refund the premium processing service fee and continue with expedited processing. In FY 2020, over 340,000 requests for premium processing were filed with USCIS.

The desired end state is to achieve end-to-end electronic processing at USCIS. End-to-end electronic processing means USCIS can electronically intake submitted applications, petitions and requests for benefits, accept payments electronically, complete the adjudication process from start to finish electronically, and correspond with customers electronically. This approach will enable USCIS to accomplish the four requirements of Section 4103.

The following figure shows the progress made to date in achieving end-to-end electronic processing.

Progress to Date

Figure 1. Current State² of End-to-End Electronic Processing Progress to Date and Case Workload³ by LOB

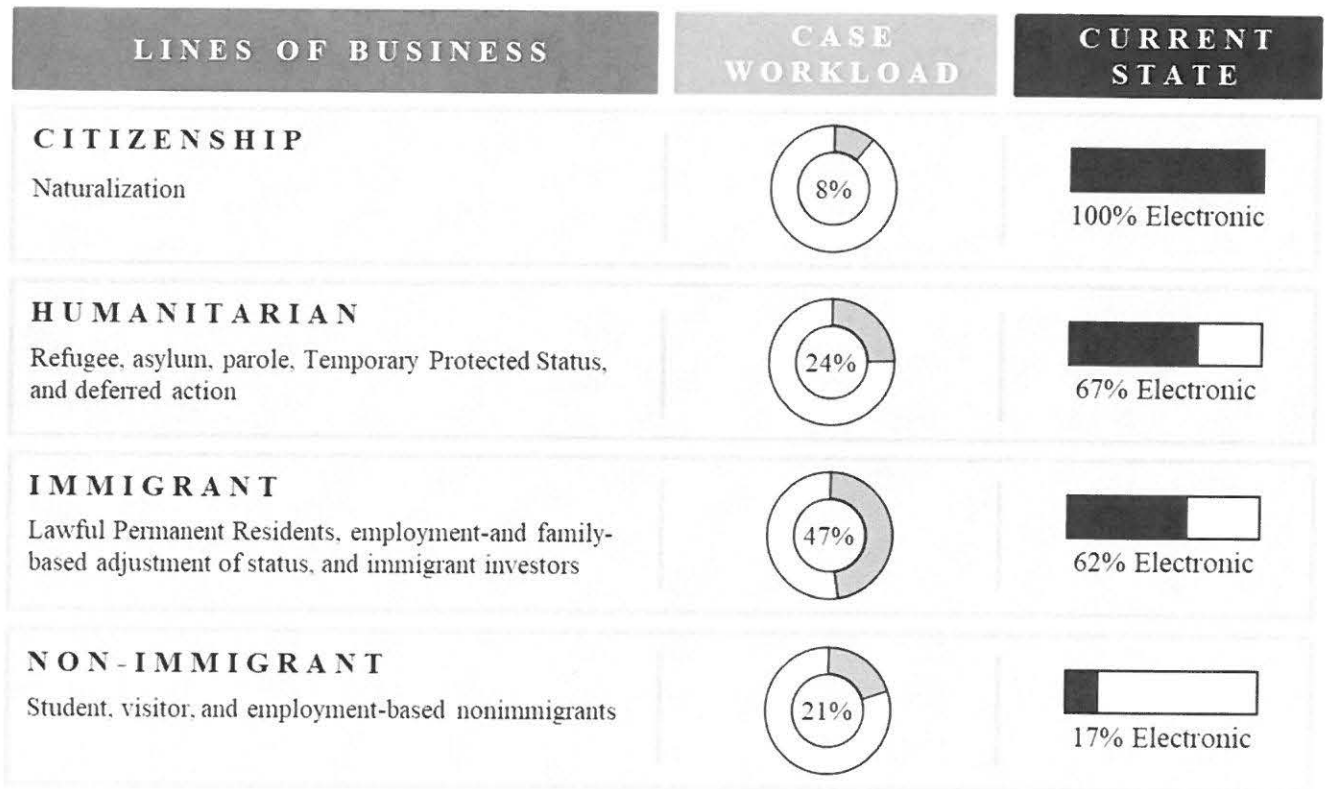
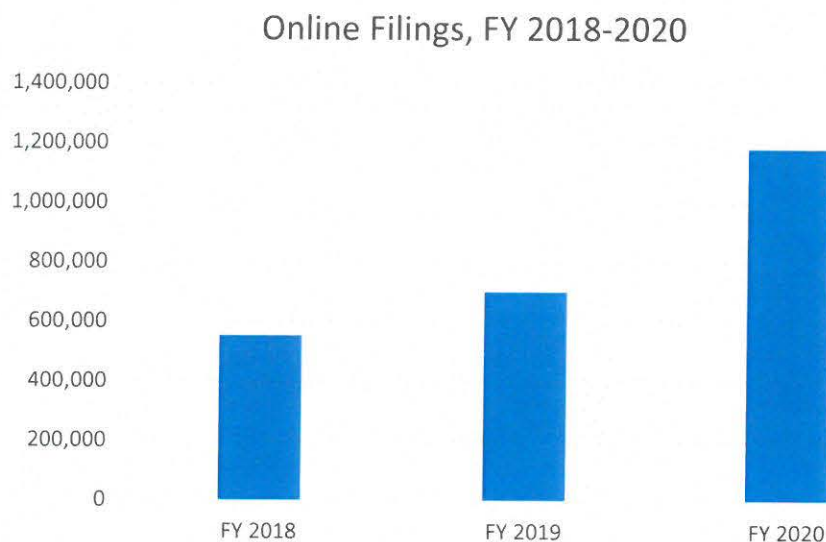


Figure 1 depicts the progress made to-date organized by LOB to achieve end-to-end electronic processing. USCIS has made measurable progress toward accepting and processing applications, petitions and requests for benefits electronically.

² The current state percentages for each LOB were calculated averaging the six domains (see p. 6) current state percentages and reflect the extent that electronic processing capabilities are available.

³ The Case Workload column is the percent of the forecasted number of applications and petitions expected to be submitted and accepted by USCIS electronically and in paper for FY 2021 that each LOB represents.

The graph below demonstrates the growth in online filings from FY2018 to FY2020. Over the last two fiscal years, the number of online filings nearly doubled.



USCIS forecasts that it will receive in total approximately 8.3 million applications, petitions, and requests for benefits in FY 2021, as depicted in Table 1.

Table 1. FY 2021 Forecasted Filing Volumes

Line of Business	Projected FY 2021 Receipts	Percent of Workload
Citizenship	622,430	8%
Humanitarian	2,010,208	24%
Immigrant	3,903,604	47%
Nonimmigrant	1,751,777	21%

The current state percentages for each LOB in Figure 1 represent the ability to process electronically across all stages of the application and petition journey. There are differences between what is available electronically to the customer (filing) and what is available to USCIS personnel (case management). This variation results from the work done each day at Lockbox facilities. The Lockbox facilities accept certain applications, petitions, and requests mailed to USCIS and determine acceptability of the submissions by scanning the application⁴, extracting the provided data, and checking the entirety of the application against USCIS business rules. This scanning at the Lockbox facilities allows USCIS to accept a paper submission and process the application or petition electronically thus ensuring equitable treatment between those customers choosing online filing and those choosing paper filing. Further, the Lockbox

⁴ Due to low filing volumes a small number of forms are processed for intake manually at the Lockbox facilities.

operations allow USCIS to realize the full efficiencies of electronic processing for those forms currently available for electronic processing even when paper filings are received. USCIS' capacity to support end-to-end electronic processing is continuously increasing through ongoing and planned efforts to bring more applications and petitions to electronic filing and case management.

Today, USCIS electronic capabilities allow:

- ***Customers to navigate through the immigration process using USCIS' self-service portal to create an online account, file certain applications, track the status of their case, and view documents and notices.*** The portal also provides online self-service tools that help customers prepare to file their applications, petitions, or requests for benefits and find related resources such as civics test study materials. **The USCIS self-service portal has over 8 million customer accounts.**
- ***Customers to file certain applications electronically.*** Applications available for electronic filing include the N-400, Application for Naturalization, the I-90, Application to Replace Permanent Resident Card; the I-130, Petition for Alien Relative; and the I-539, Application to Extend/Change Nonimmigrant Status. In March of 2021, the I-765, Application for Employment Authorization became available for Optional Practical Training⁵ (OPT) in a soft launch for online filing with over 1,000 applications submitted or in draft form in the first week. **USCIS has the capability to intake 34 percent of the total FY 2021 forecasted receipts of its applications, petitions, and requests for benefits electronically, as well as online payments, if customers choose online filing.**⁶
- ***USCIS personnel to handle all aspects of case management electronically for certain applications.*** This includes the N-400, I-130, I-90, I-539, I-821, Application for Temporary Protected Status, and I-821D, Consideration of Deferred Action for Childhood Arrivals, filings. Additionally, USCIS processes a significant portion of I-765s electronically. **This capability allows USCIS to process 69 percent of its case workload electronically.**⁷
- ***Employers to register online and pay a registration fee for the H-1B selection process.*** USCIS then runs all validly submitted registrations in a random selection process and electronically notifies those selected that they are eligible to file an I-129 H-1B petition. Only those petitioners with selected registrations are eligible to file their completed petitions within a set period. **In 2021, USCIS received 308,504 online registrations for the H-1B selection process, a 21 percent increase from 2020.**

⁵ Optional Practical Training (OPT) is temporary employment that is directly related to an F-1 student's major area of study. Eligible students can apply to receive up to 12 months of OPT employment authorization before completing their academic studies (pre-completion) and/or after completing their academic studies (post-completion). However, all periods of pre-completion OPT will be deducted from the available period of post-completion OPT.

⁶ Currently, only 15 percent of applications, petitions and requests for benefits are filed online.

⁷ Case Management processing percentages include capabilities in Electronic Information System (ELIS), Global, and CLAIMS 3.

By the end of FY 2021, USCIS will have the capability to:

- Process the I-821, Application for Temporary Protected Status, concurrent with the I-765 for electronic filing as the first set of bundled applications available for end-to-end processing electronically.
- Process the I-589, Application for Asylum and for Withholding of Removal, electronically end-to-end.
- Process the I-485, Application for Adjustment of Status, electronically within case management, to include managing of digital evidence and electronic records of interview.

Approach to Execution

Domain Driven Design

USCIS has delivered electronic capabilities to each of its LOB through an information technology (IT) architectural methodology that promotes strategic value in development, integration, and organization to guide its software development approach known as domains. The domain approach enables the Office of Information Technology (OIT) to focus on the core business functions supporting the mission while engaging business experts. This approach works to reduce complexity, leverage existing services, improve scalability, increase deployment cycles, lower life cycle costs, and reduce risks. This methodology, combined with agile development practices, has allowed USCIS to support business process re-engineering and lean IT delivery. These efforts support USCIS' move to using modern practices such as human centered-design, and person-centric architectures to meet the requirement for end-to-end electronic processing. End-to-end processing means USCIS can receive electronically submitted applications, petitions, and requests for benefits and payments, complete the adjudication process from start to finish, and correspond with customers electronically.

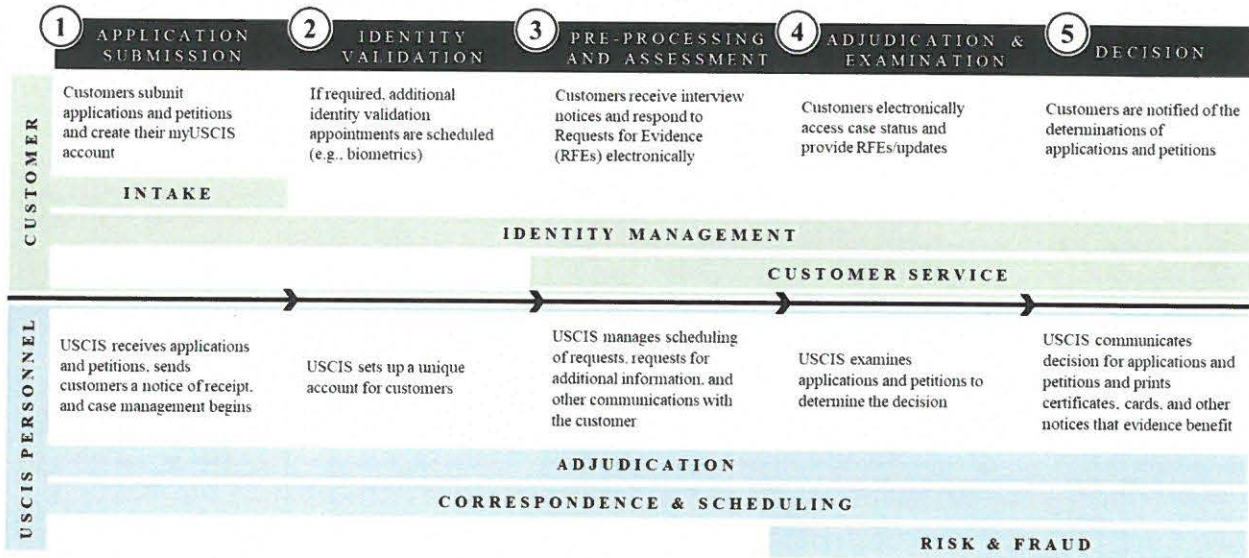
OIT works in a framework of six interdependent domains that support each portion of the immigration processing pipeline, with one underlying domain providing support to the others. The domains are:

- **Intake:** allows customers to submit applications and petitions online, pay online, and moves the data into the Adjudication domain.
- **Identity Management:** allows customers to create and modify online accounts and profiles and access their accounts for informational and transactional digital services.
- **Customer Service:** allows customers to communicate with USCIS across digital channels as they navigate the immigration journey and resolve issues.
- **Adjudication:** allows USCIS personnel to manage, store, and handle all aspects of adjudicating applications, petitions and requests for benefits.
- **Correspondence & Scheduling:** enables USCIS personnel to produce notices, physically secure documents, and manage scheduling of requests.
- **Risk & Fraud:** provides USCIS personnel the ability to manage background checks and identity validation and resolve any identified issues.

Additionally, there is a Mission Support domain that supports all the other domains with security, field services, infrastructure (including assets and licenses), and program support (including analytics).

The primary domains integrate with each other throughout the adjudication process as shown in Figure 2 Application/Petition Journey. This journey describes the domains and process from the Customer and USCIS personnel experience.

Figure 2. Application/Petition Journey



Agile Development

Additionally, USCIS has begun to make use of minimally viable product (MVP) as a development tool that can be leveraged for the digitization of other requests for benefit. An MVP is a product with enough features to attract early-adopter customers and validate a product idea early in the product development cycle. USCIS recently used MVP to develop end-to-end electronic processing for the I-765 for OPT. This process helped the product team receive user feedback as quickly as possible to improve the product. This agile methodology is built on validating and iterating products based on user input. The I-765 OPT was developed and deployed in 90 days as an MVP. This approach will enable USCIS to rapidly develop and deliver electronic capabilities incrementally to meet the Section 4103 requirement.

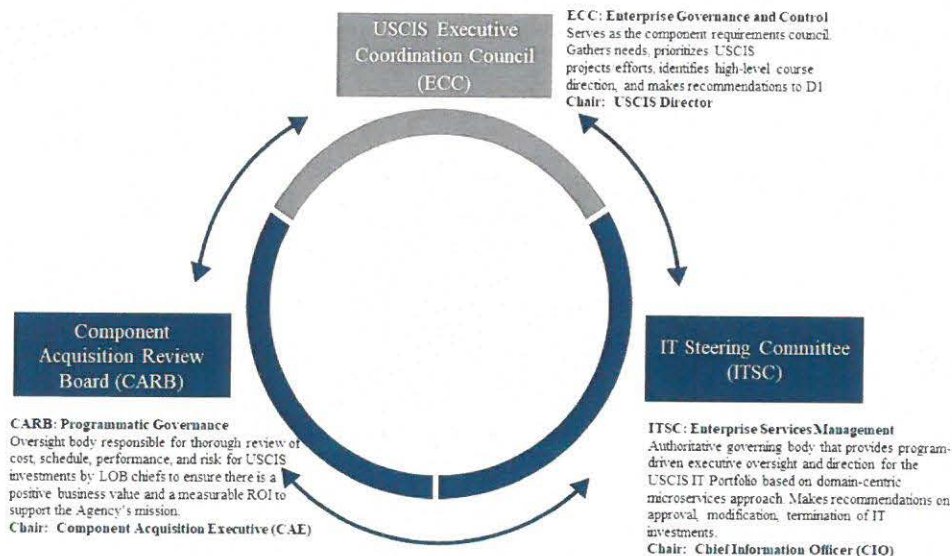
Governance Structure

To ensure that USCIS continues to make demonstrable progress in implementing Section 4103, it will leverage its established governance structure, shown in Figure 3, and procurement strategy to align leaders and key decision makers from across the enterprise to consolidate priorities, promote collaboration, reduce redundancies, promote system integration, and make resource decisions. Within USCIS, the Executive Coordination Council (ECC), Information Technology Steering Committee (ITSC), and the Component Acquisition Review Board (CARB) enable Agency-wide IT decision making. These entities will work together to balance priorities across

each of the USCIS directorates and program offices and inform key decisions related to achieving the Section 4103 requirements.

Figure 3. USCIS Solution Governance Interaction

USCIS Solution Governance Interaction



USCIS uses its Capital Planning and Investment Control (CPIC) program as its procurement strategy and cost reporting structure to enable the IT investments to deliver the foundational and incremental domain services for end-to-end electronic processing. Going forward, CPIC will continue to be the procurement, management and evaluation strategy for USCIS' technology investments in coordination with the Department of the Homeland Security (DHS).

In addition, USCIS will continue to leverage the established governance structure and procurement strategy to coordinate and track all aspects of the implementation of the Section 4103 Plan to include:

- Planning and Prioritization:** Since LOB and domains have interdependent IT needs, USCIS must prioritize the portions of each LOB that are still dependent on paper receipts and the services required for each domain to enable expanded and improved end-to-end electronic processing. USCIS governance bodies use two complementary processes to prioritize first by LOB, then within domains. These processes will be repeated as needed to validate and/or reprioritize work to ensure alignment with changing operational environments, customer needs, and administration priorities.
- Resources:** Through the established governance structure, OIT will review the Section 4103 Plan and make recommendations on the allocation of resources, determine any known dependencies or constraints, and identify technical requirements to optimize delivery of services. This approach will enable USCIS to effectively allocate resources

and avoid duplicative efforts, while addressing the most critical needs first. Aided by agile development practices, OIT will foster collaboration to iteratively deliver requirements and avoid potential delays.

- **Oversight:** The ITSC will track the implementation of the Section 4103 Plan and report on the progress and any necessary course corrections to the ECC.

As previously discussed, USCIS has made significant strides in developing electronic capabilities for end-to-end application and petition processing. Implementing the Section 4103 Plan will build upon the foundation that USCIS has in place today.

III. 5-Year Project Schedule

End State

USCIS will promote and enable the development of solutions related to electronic filing and processes to support electronic capabilities. The desired end state is to achieve end-to-end electronic processing at USCIS which means the Agency can electronically intake submitted applications, petitions, and requests for benefits, accept payments electronically, complete the adjudication process from start to finish electronically, and correspond with customers electronically. Through the elimination of high-volume paper handling and manual activities, end-to-end electronic processing will bring efficiency to case processing resulting in improved processing times. USCIS will expose the capability to leverage industry solutions and efficiencies for a third-party intake system to support the needs of the Agency and its customers. USCIS seeks to improve the customer experience through a suite of self service capabilities and eventually through a third-party intake system.

Prioritization and Delivery Framework

USCIS developed a prioritization framework which considers multiple criteria to align the activities of the 5-year plan with critical Agency priorities and deliver value and impact. As depicted in Figure 4, the USCIS workload was assessed against the framework weighted criteria to prioritize delivery of end-to-end electronic processing by LOB. As priorities and requirements shift, the Agency will use this robust and agile framework to revalidate the prioritization. This methodology offers a dynamic and repeatable approach to assess Agency needs through established and weighted criteria.

Figure 4. LOB Prioritization Framework Criteria and Sub-Factors

1 ENABLING EXECUTION		2 PROVIDING VALUE		3 DERIVING MEASURABLE IMPACT	
	WEIGHTED PERCENT		WEIGHTED PERCENT		WEIGHTED PERCENT
TIME		BENEFITS		USCIS	
- Duration of development	12%	- Revenue optimization and cost efficiencies	13%	- Benefits to USCIS employees	10%
- Time until deployed for use		- Operational improvements		- Operational efficiencies	
COMPLEXITY		COSTS		EXTERNAL PARTNERS	
- Stakeholders involved	12%	- Training / onboarding costs	12%	- Impact to other government agencies and partners	6%
- Development reusability		- Cost to develop, if funded through directorate		- Interagency interoperability	
- Business process complexity					
RESOURCE AVAILABILITY		STRATEGIC ALIGNMENT		CUSTOMER	
- Available staffing	6%	- Administration priorities	15%	- Volume of customers	14%
- Additional procurement required		- DHS, USCIS, and directorate priorities		- Benefit to USCIS customers	
	30% Total		40% Total		30% Total

Periodically, the ITSC and ECC will review and validate the relative weight of each of the nine sub-factors based on current operational needs.

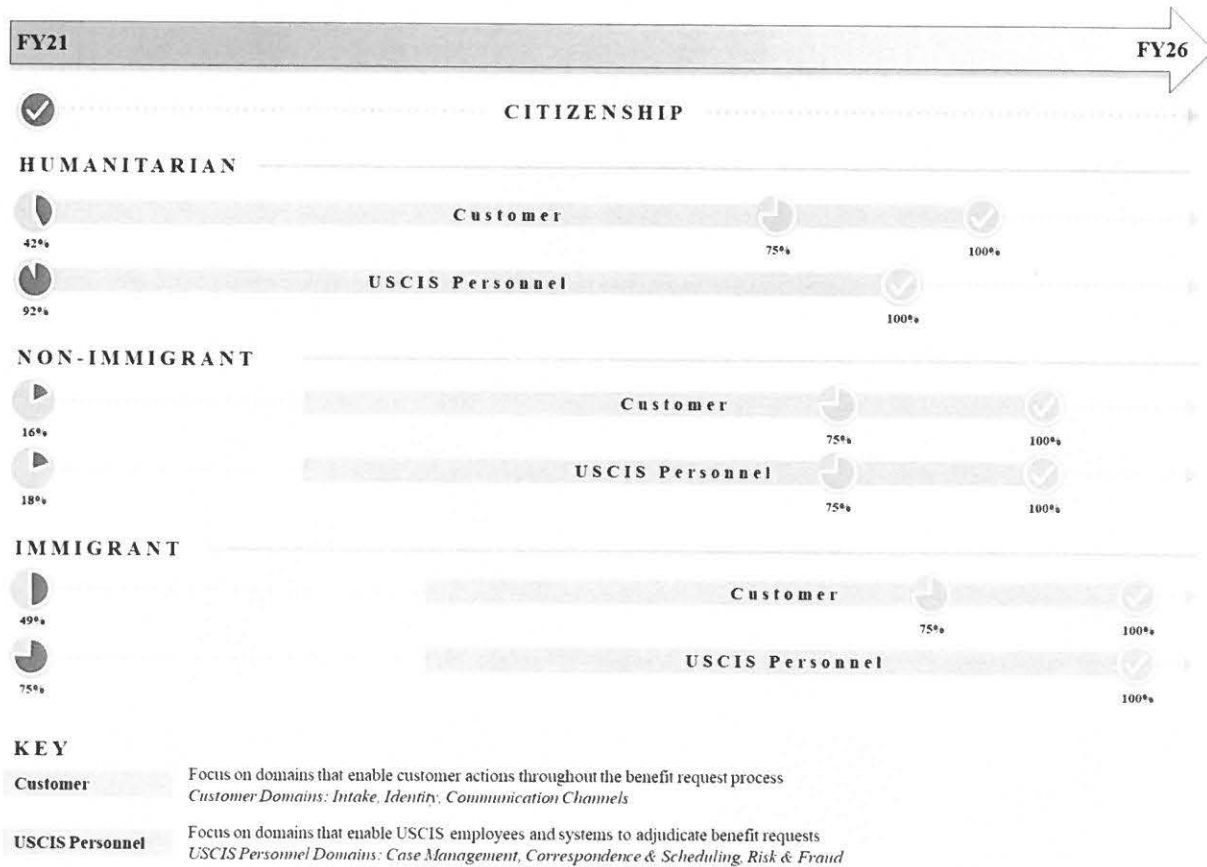
Simultaneously, the ITSC will prioritize the services being developed within each domain against current operational needs and Agency priorities. This ensures that the LOB priorities are aligned with and supported by the domain priorities.

The Agency will use existing domain capabilities and knowledge as the foundation to execute end-to-end electronic processing across LOB. This will maximize the reuse of services and provide more rapid implementation. The domain approach driven by identified priorities enables the integration of IT services and business functions working in tandem towards implementation of the Section 4103 Plan.

Schedule

The high-level project schedule shown in Figure 5 represents the ongoing activity to incrementally deliver electronic intake and case management capabilities within each LOB. Concurrently, work continues within the domains to ensure availability of necessary services to support each LOB.

Figure 5. Project Schedule⁸ (All percentages within this schedule indicate the ability to electronically process benefit requests, not the volume of benefit requests being processed electronically.)



⁸ The current state percentages for each LOB were calculated by averaging the applicable domain current state percentages as identified in the key.

Expansion of Premium Processing

USCIS' progress towards establishing end-to-end electronic processing and compliance with section 4103 requirements will further enable premium processing expansion to additional filing types as identified in the Emergency Stopgap USCIS Stabilization Act. Premium processing currently provides expedited processing within 15 calendar days for petitioners who file a I-129, Petition for Nonimmigrant Worker, or a I-140, Immigrant Petition for Alien Worker. USCIS' customers pay an additional fee for the expedited service. In addition to establishing technical infrastructure to support premium processing expansion, USCIS will engage in the appropriate rulemaking, where necessary, to enable premium processing expansion.

It is important to note that for those classifications specifically mentioned in the Emergency Stopgap USCIS Stabilization Act, such as I-539 and I-765, USCIS will need to issue a final rule and comply with the Paperwork Reduction Act 60/30-day requirements for form changes. For the other employment-based applications, the Emergency Stopgap USCIS Stabilization Act does not provide USCIS the same authority as the former Section 286(u) of the Immigration and Nationality Act to extend the new \$2,500 fee and 15-day timeframe without rule making. Extending the law's \$2,500 fee and current regulation's 15-days to the Nonimmigrant line of business that is requested on I-129, but that did not otherwise have premium processing available as of August 1, 2020, can be done using the current regulations. To date, this expansion has included E-3 (E-3 Specialty Occupation Workers from Australia). USCIS is currently exploring expanding premium processing services for Multinational Executives or Managers (E13 I-140).

Separate forms that have not previously been designated for premium processing, such as the I-129CW and I-129S, require traditional rulemaking, as do blanket L petitions, where the I-129S is filed with USCIS as a stand-alone form. Section 4102(b)(1) of the Emergency Stopgap USCIS Stabilization Act permits expansion of premium processing to benefits in that section with a final rule using the fees and time frames in that section. Expansion of premium processing to benefits not included in Section 4102 (b)(1) or requested using a form for which premium processing was available on August 1, 2020, requires notice and comment rulemaking to implement.

Performance Measurement

USCIS will assess progress towards addressing Section 4103 requirements across the Agency through performance metrics, many of which are already in place. The following measures, will be used both individually to inform progress against the individual Section 4103 requirements, and used to measure progress towards improving processing times for all immigration and naturalization benefit requests:



One | Establish electronic filing procedures for all applications and petitions for immigration benefits

- Percent of benefit requests available for end-to-end electronic processing by LOB
- Percent of benefit requests submitted electronically by LOB



Two | Accept electronic payments of fees at all filing locations

- Percent of filing locations that accept payments electronically

- Percent of payment transactions processed electronically



Three | Issue correspondence, including Decisions, Requests for Evidence, and Notices of Intent to Deny, to immigration benefit requestors electronically

- Percent of customer correspondence capable of being conducted electronically by LOB



Four | Improve processing times for all immigration and naturalization benefit requests.

- Processing time for immigration and naturalization benefit requests

For semiannual reporting to Congress, USCIS will indicate percent increase or decrease of information where appropriate to demonstrate progress over time. In addition to these measures, USCIS will internally track performance of initiatives not limited to business process improvements and technology upgrades that contribute to improved processing time and enhanced customer experience for immigration and naturalization benefit requests. USCIS will continue to survey its customers experiences through the online portal. Furthermore, USCIS will manage the risks and constraints described in Section V in order to maximize Section 4103 performance where possible. Lastly, where possible USCIS will leverage what is learned in electronic filing and processing to improve the paper processes.

IV. Cost Estimate and Procurement Strategies

Today, USCIS uses the CPIC framework to track and report on the projected USCIS IT costs: personnel; operations and maintenance; and development. Those budget projections are included each year in the Future Years Homeland Security Program document that projects the Department’s budget 5 years into the future. For the purposes of the Section 4103 Plan, the CPIC development costs were distilled from the full FY 2021 IT profile.

Operating within the existing CPIC framework supports the USCIS IT development approach to leverage existing domains and services. In addition, it promotes the delivery of MVP solutions that provide a framework upon which future improvements can be added. Over the next 5 years, USCIS plans to expand domain capabilities and end-to-end electronic processing across all remaining LOB for applications, petitions and requests for benefits.

Table 2 shows expected CPIC development funding by year for this Plan. There are many factors that may affect these costs, which will be reviewed and possibly adjusted during our annual planning efforts. Any additional development requirements can be procured using surge capacity on current contracts. USCIS plans to use CPIC guidelines and the procurement strategies adopted under CPIC if additional procurements, beyond the surge capabilities in current contracts, are needed in the future to implement the Section 4103 Plan.

The funding assumptions in this Plan are contingent on fee receipt levels that are consistent with forecasts, continued demand for premium processing services, and the implementation of the next fee rule to ensure that USCIS is able to set its fees at a level that will recover the full costs of its operations.

Table 2. FY 2021 – FY 2025 Cost Estimates⁹

FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
\$69,421,000	\$69,781,000	\$76,641,000	\$78,940,000	\$76,514,000

⁹ As USCIS works to develop its budgets beyond FY 2022, operational and funding targets presented in this Plan may be adjusted based on evolving operational requirements and the availability of resources to address the proposed funding targets in the annual projections.

V. Operational Challenges and Risks

Transitioning the nation's immigration processing from a paper-based process to an electronic process involves active and responsive management, organizational change management, and mitigation of operational risks, constraints, and tradeoffs. This allows USCIS to incrementally realize processing efficiencies to improve processing times as the Agency shifts to a fully electronic posture. Through its governance frameworks, USCIS will work diligently to mitigate challenges over the course of the five years to address issues as they arise.

As USCIS prepares to implement and execute its Section 4103 Plan, the following challenges will be considered:

1. **Complexity of End-to-End Electronic Processing:** Transitioning from paper forms and manual processing, to end-to-end electronic processing is an inherently complex risk. There are many variables that may impact transition to end-to-end electronic processing such as availability of resources and technologies, business rules, the prioritization between various options, and compliance with the Paperwork Reduction Act. USCIS will mitigate this risk by leveraging best practices related to its MVP approach, while identifying similar complexities across related processes where tested and proven IT capabilities can be reused to fulfill related requirements.
2. **Change Management:** Any business transformation carries organizational change management (OCM) considerations. USCIS must prepare its leaders, staff, and customers for cultural and behavioral shifts to better accommodate the Agency's readiness for end-to-end electronic processing. USCIS will evaluate all OCM needs such as education, communication, customer outreach, labor relations, managing impact to work environment, and resources to ensure that USCIS' culture and operating procedures are best positioned to pursue the Section 4103 Plan.
3. **Funding:** As USCIS is 97 percent fee-funded, there is an inherent risk in fee collection projections aligning with actual collections, while USCIS has historically achieved projected collections to accurately align with actuals, there are still unpredictable and unknown factors that could impact collections. USCIS will continue to monitor its fee collections and allocate resources to IT delivery accordingly.
4. **Shifting/Competing Priorities:** In response to legislation, changing circumstances or Agency priorities, USCIS may need to shift staff or funding dedicated to the Section 4103 Plan, potentially impacting timelines. USCIS will address shifting or competing priorities using the established prioritization framework in consultation with the appropriate USCIS governance bodies.
5. **Cyber Security:** USCIS is actively targeted by cyber threat actors. While the move to electronic application and petition processing offers clear benefits to USCIS and those the Agency serves, it comes with additional risks. To mitigate these risks, USCIS will continue

to expand and modernize its security program to match the scale and complexity of end-to-end electronic processing balanced against the threats.

Additionally, there are factors outside of the control of the Agency, such as public adoption, industry partnerships, and internet accessibility which will impact how much of USCIS' work is ultimately electronic.

1. **Public Adoption:** Despite USCIS' provision of electronic services, customers are still often choosing paper as their preferred method to submit applications and petitions. In FY 2020, Lockboxes across the country received approximately 1.5 million paper filings for applications, petitions, requests for benefits that are already available online, requiring USCIS to incur significant costs to digitize these forms for processing. USCIS anticipates this trend will continue without incentives for online adoption. To meet Congress' expectations of improved processing times, customers must be positioned with the tools, services, and understanding to participate in the process. USCIS is working on initiatives that incentivize public adoption of electronic filing such as policy changes, rulemaking, and marketing strategies.
2. **Industry Partnerships:** USCIS wants to promote and enable the development of solutions related to electronic filing and processes to support electronic capabilities. Leveraging industry solutions and efficiencies for a third-party intake system can support the needs of the Agency and its customers.
3. **Accessibility:** End-to-end electronic processing may raise concerns for stakeholders that work closely with applicants to ensure the process is as accessible and equitable as possible for everyone, not just non-governmental organizations and lawyers. As USCIS continues to transition to end-to-end electronic processing, the Agency will mitigate these concerns by engaging the public to address the inability to file online, the use of other public online filing options, and continuing to offer to accept paper forms where electronic filing may not be possible.

VI. Conclusion

The Section 4103 Plan represents an opportunity for USCIS to continue to build end-to-end electronic processing to meet the evolving needs of customers and the Agency. As highlighted in this report, many electronic processing initiatives have been completed and more are underway. By using existing, foundational knowledge and infrastructure, USCIS is well-positioned to meet the requirements of Section 4103. The Agency has worked diligently to develop an Agency-wide operating model centered around domains and has invested in IT to enable end-to-end electronic processing. These domains support USCIS by offering services across all directorates, eliminating a siloed operating approach and increasing efficiencies.

Aligning the Section 4103 Plan to the six domains provides USCIS a clear path forward for integrating this Plan with associated costs and procurement strategies. Using the adopted prioritization framework, USCIS will assess requests, understand tradeoffs, and evaluate ongoing initiatives to remain dynamic and shift priorities appropriately to meet current needs of the Agency. Over the course of this Plan's implementation, the Agency will work diligently to stay on track, work with the ITSC and ECC to maintain focus, hold stakeholders accountable, mitigate challenges and constraints, and address modifications as priorities shift. Assessing priorities semi-annually provides opportunities to address challenges, risks, and conflicts, and shift resources as needed.

Meeting the stated requirements and accomplishing the success metrics in this report will make a lasting impact on USCIS operations. USCIS, through electronic processing, will improve operational efficiencies and customer service. Expected operational efficiencies include faster processing times, expedited payment transactions, improved adjudication times, and enhanced capability to distribute case workload (for example, shifting applications from one Service Center to another based on available capacity, sending applications to adjudicators in a telework environment). Expected customer service improvements include increased transparency, customer access to near-real time status requests, and faster benefit request decisions.

The Section 4103 Plan positions USCIS to achieve end-to-end electronic processing across various applications and petitions and improve processing times. By successfully implementing this Plan, USCIS will be better equipped to meet the needs of its customers, its partners, and the Nation.

VII. Appendix

A. Acronyms

ACRONYM	MEANING
CPIC	Capital Planning and Investment Control
ECC	USCIS' Executive Coordination Council
ELIS	Electronic Immigration System
FY	Fiscal Year
IT	Information Technology
ITSC	USCIS' Information Technology Steering Committee
LOB	Lines of Business
MVP	Minimum Viable Product
OCM	Organizational Change Management
OIT	Office of Information Technology
OPT	Optional Practical Training
USCIS	U.S. Citizenship and Immigration Services

B. Key Terms

The following table provides key definitions of terms used throughout this plan.

TERM	DEFINITION
End-to-End Electronic Processing	The ability to electronically intake submitted applications, petitions, and requests for benefits, accept payments electronically, complete the adjudication process from start to finish electronically, and correspond with customers electronically.
Electronic Filing	Applications, petitions and requests submitted to USCIS through an online form or other method not requiring the mailing of paper.
Digital Correspondence	Official communication that is completed using a digital format (e.g., myUSCIS account) and not paper or mail.
Electronic Payment	The receipt of funds that are accepted and processed electronically.
Domain	An IT architectural methodology that promotes strategic value in development, integration, and organization to guide its software development approach.
Lines of Business	The business areas aligned to types of filings and are: Citizenship, Humanitarian, Immigrant, and Nonimmigrant.
Lockbox	USCIS locations that receive forms and applications and process customer payments.
Premium Processing	A service provided by USCIS that allows customers to pay an extra fee to have their forms processed within 15 calendar days. This service is available for the Form I-129 (Petition for Nonimmigrant Worker) and Form I-140 (Immigrant Petition for Alien Worker).
Receipts	Records of individual immigration and benefits forms received by USCIS.
Service Center	Physical location for conduct of USCIS immigration and benefits filing activities.
Soft Launch	The practice of releasing online filing capabilities to a limited audience of customers to ensure proper functioning and identify any potential fixes that need to be made before allowing access to any customer.
Case Workload	The number of application and petitions accepted by USCIS for adjudication.

C. Forms by Line of Business¹⁰

Line of Business	Form Number	Form Title
Citizenship	I-942	Request for Reduced Fee
Citizenship	N-300	Application to File Declaration of Intention
Citizenship	N-336	Request for a Hearing on a Decision in Naturalization Proceedings (Under Section 336 of the INA)
Citizenship	N-400	Application for Naturalization
Citizenship	N-426	Request for Certification of Military or Naval Service
Citizenship	N-470	Application to Preserve Residence for Naturalization Purposes
Citizenship	N-565	Application for Replacement Naturalization/Citizenship Document
Citizenship	N-600	Application for Certificate of Citizenship
Citizenship	N-600K	Application for Citizenship and Issuance of Certificate Under Section 322
Citizenship	N-644	Application for Posthumous Citizenship
Citizenship	N-648	Medical Certification for Disability Exceptions
Humanitarian	I-134	Affidavit of Support
Humanitarian	I-134 Supplement	Affidavit of Support
Humanitarian	I-407	Record of Abandonment of Lawful Permanent Resident Status
Humanitarian	I-589	Application for Asylum and for Withholding of Removal
Humanitarian	I-590	Registration for Classification as Refugee
Humanitarian	I-600	Petition to Classify Orphan as an Immediate Relative
Humanitarian	I-600 Supplement	Petition to Classify Orphan as an Immediate Relative
Humanitarian	I-600A	Application for Advance Processing of an Orphan Petition
Humanitarian	I-600A Extension	Application for Advance Processing of an Orphan Petition
Humanitarian	I-600A Update	Application for Advance Processing of an Orphan Petition
Humanitarian	I-602	Application by Refugee for Waiver of Inadmissibility Grounds
Humanitarian	I-730	Refugee/Asylee Relative Petition
Humanitarian	I-765V	Application for Employment Authorization for Abused Nonimmigrant Spouse
Humanitarian	I-800	Petition to Classify Convention Adoptee as an Immediate Relative
Humanitarian	I-800 Supplement	
Humanitarian	I-800A	Application for Determination of Suitability to Adopt a Child from a Convention Country
Humanitarian	I-800A Supplement 1	Application for Determination of Suitability to Adopt a Child from a Convention Country
Humanitarian	I-800A Supplement 2	Application for Determination of Suitability to Adopt a Child from a Convention Country
Humanitarian	I-800A Supplement 3	Application for Determination of Suitability to Adopt a Child from a Convention Country
Humanitarian	I-821	Application for Temporary Protected Status

¹⁰ This list excludes forms associated with the credible and reasonable fear processes, as those forms are not filed by applicants, but rather generated internally by the Agency.

Line of Business	Form Number	Form Title
Humanitarian	I-821D	Consideration of Deferred Action for Childhood Arrivals
Humanitarian	I-854	Inter-Agency Alien Witness and Informant Record
Humanitarian	I-854A	Inter-Agency Alien Witness and Informant Record
Humanitarian	I-854B	Inter-Agency Alien Witness and Informant Record
Humanitarian	I-881	Application for Suspension of Deportation or Special Rule Cancellation of Removal (Pursuant to Section 203 of Public Law 105-100 (NACARA))
Humanitarian	I-914	Application for T Nonimmigrant Status
Humanitarian	I-914A	Application for T Nonimmigrant Status
Humanitarian	I-914B	Application for T Nonimmigrant Status
Humanitarian	I-918	Petition for U Nonimmigrant Status
Humanitarian	I-918A	Petition for U Nonimmigrant Status
Humanitarian	I-918B	Petition for U Nonimmigrant Status
Humanitarian, Immigrant, Nonimmigrant	I-765	Application for Employment Authorization
Immigrant	G-325A	Biographic Information (for Deferred Action)
Immigrant	I-102	Application for Replacement/Initial Nonimmigrant Arrival-Departure Document
Immigrant	I-130	Petition for Alien Relative
Immigrant	I-130A	Petition for Alien Relative
Immigrant	I-131	Application for Travel Document
Immigrant	I-131A	Application for Travel Document (Carrier Documentation)
Immigrant	I-140	Immigrant Petition for Alien Workers
Immigrant	I-191	Application for Relief Under Former Section 212(c) of the Immigration and Nationality Act (INA)
Immigrant	I-360	Petition for Amerasian, Wider(er), or Special Immigrant
Immigrant	I-485	Application to Register Permanent Residence or Adjust Status
Immigrant	I-485 Supplement A	Supplement A to Form I-485, Adjustment of Status Under Section 245(i)
Immigrant	I-485 Supplement J	Confirmation of Bona Fide Job Offer or Request for Job Portability Under INA Section 204(j)
Immigrant	I-526	Immigrant Petition by Alien Investor
Immigrant	I-551 for IV	Immigrant Visa (formerly OS155A)
Immigrant	I-601	Application for Waiver of Grounds of Inadmissibility
Immigrant	I-601A	Application for Provisional Unlawful Presence Waiver
Immigrant	I-612	Application for Waiver of the Foreign Residence Requirement (under Section 212(e) of the Immigration and Nationality Act, as Amended)
Immigrant	I-687	Application for Status as a Temporary Resident Under Section 245A of the Immigration and Nationality Act
Immigrant	I-690	Application for Waiver of Grounds of Inadmissibility
Immigrant	I-693	Report of Medical Examination and Vaccination Record

Line of Business	Form Number	Form Title
Immigrant	I-698	Application to Adjust Status from Temporary to Permanent Resident (Under Section 245A of the INA)
Immigrant	I-751	Petition to Remove Conditions on Residence
Immigrant	I-829	Petition by Investor to Remove Conditions on Permanent Resident Status
Immigrant	I-864	Affidavit of Support Under Section 213A of the INA
Immigrant	I-864A	Contract Between Sponsor and Household Member
Immigrant	I-864EZ	Affidavit of Support Under Section 213A of the Act
Immigrant	I-864P	2020 HHS Poverty Guidelines for Affidavit of Support
Immigrant	I-865	Sponsor's Notice of Change of Address
Immigrant	I-90	Application to Replace Permanent Resident Card
Immigrant	I-907 (I-140)	Request for Premium Processing Service
Immigrant	I-924	Application For Regional Center Designation Under the Immigrant Investor Program
Immigrant	I-924A	Annual Certification of Regional Center
Nonimmigrant	I-129 (All Others)	Petition for a Nonimmigrant Worker
Nonimmigrant	I-129 (H1B, H2A, H2B)	Petition for a Nonimmigrant Worker
Nonimmigrant	I-129CW	Petition for a CNMI-Only Nonimmigrant Transitional Worker
Nonimmigrant	I-129CWR	Semiannual Report for CW-1 Employers
Nonimmigrant	I-129F	Petition for Alien Fiancé(e)
Nonimmigrant	I-192	Application for Advance Permission to Enter as a Nonimmigrant
Nonimmigrant	I-193	Application for Waiver of Passport and/or Visa
Nonimmigrant	I-212	Application for Permission to Reapply for Admission into the United States After Deportation or Removal
Nonimmigrant	I-290B	Notice of Appeal or Motion
Nonimmigrant	I-539	Application to Extend/Change Nonimmigrant Status
Nonimmigrant	I-539A	Application to Extend/Change Nonimmigrant Status
Nonimmigrant	I-817	Application for Family Unity Benefits
Nonimmigrant	I-824	Application for Action on an Approved Application or Petition
Nonimmigrant	I-905	Application for Authorization to Issue Certification for Health Care Workers
Nonimmigrant	I-907 (I-129)	Request for Premium Processing Service
Nonimmigrant	I-929	Petition for Qualifying Family Member of a U-1 Nonimmigrant
Nonimmigrant	I-941	Application for Entrepreneur Parole