

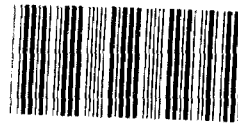
GAO

Briefing Report to Congressional  
Committees

September 1987

IMMIGRATION  
REFORM

Systematic Alien  
Verification System  
Could Be Improved



134301

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Information Management and  
Technology Division

B-227265

September 30, 1987

The Honorable Edward M. Kennedy  
Chairman, Subcommittee on Immigration  
and Refugee Affairs  
Committee on the Judiciary  
United States Senate

The Honorable Romano L. Mazzoli  
Chairman, Subcommittee on Immigration,  
Refugees and International Law  
Committee on the Judiciary  
House of Representatives

The Immigration Reform and Control Act of 1986 requires us to examine the current Systematic Alien Verification for Entitlements (SAVE) pilot projects, and report thereon no later than October 1, 1987. The act requires the General Accounting Office to examine the effectiveness of the pilot projects and any problems with their implementation, particularly as they may apply to the implementation of a nationwide verification system. This report discusses the results of our review of only the automated portions of SAVE, and documents a July 24, 1987, oral briefing we provided staff members of your Subcommittees (see appendix). Our office will issue another report as required by the act;<sup>1</sup> the report will contain a summary of the information provided below, user experience with SAVE, and the status of agency plans to implement the act's requirements.

The act also requires the Immigration and Naturalization Service (INS) to implement by October 1, 1987, a nationwide system for use in verifying the immigration status of aliens applying for benefits under the Aid to Families with Dependent Children, Medicaid, Unemployment Compensation, Food Stamps, and certain housing and educational assistance programs. To provide INS our views before it must implement such a system, we evaluated the automated SAVE system used during the pilot projects. Our objective was to determine whether the automated verification system used during the pilot projects was accurate, complete, and reliable, and if not, whether INS had plans to address these issues during the development of the nationwide verification system.

<sup>1</sup>Immigration Reform: Verifying the Status of Aliens Applying for Federal Benefits (GAO/HRD-88-7, Oct. 1, 1987).

The SAVE pilot projects provided automated access to a specific subset of an INS data base—known as the Central Index—for verification of the alien status for entitlement eligibility decisions. Using computer terminals, program administrators accessed the system by entering an alien's identification number, and received either positive verification that an alien had legal status, known as primary verification, or instructions to initiate secondary verification because of insufficient data or indications that the alien might have been in an illegal status. If a secondary verification was indicated, these program administrators requested further verification from INS personnel, and if available, forwarded a copy of the documentation provided by the alien applying for benefits to an INS office. An INS employee then searched other automated and manual systems and files, and determined the alien's legal status. Secondary verification, therefore, is a more time-consuming and costly way of verifying an alien's status.

In general, our limited review disclosed that in the majority of the cases the automated verification system used during the pilot projects provided a quick, positive response to an alien's legal status. In addition, the verification process detected aliens with an ineligible status who had applied for benefits. For example, in a recent 6-month period, this process detected 734 aliens in an ineligible status out of 13,426 aliens who had applied for unemployment compensation benefits in three states.

Our review, however, also disclosed that there is considerable room for improving the accuracy and reliability of the automated system. For example, INS records show that over 4,100 of the 13,426 aliens applying in the three states required secondary verification; of these, 62 to 96 percent were found to have legal status after INS checked other manual and automated records. Improving the accuracy and reliability of the data base offers the potential for reducing the number of time-consuming and costly secondary verifications.

We visited three INS District Offices to determine the causes of secondary verification, and observed a number of cases, which although not randomly selected nor statistically projectable, give some indications as to why the automated system could not make a positive verification during primary verification. Essentially, we found that the automated system either did not contain sufficient information on some aliens, or the information in the system was inaccurate, incomplete, or not current. Since INS maintains official U.S. records on aliens, its Central Index should accurately and completely reflect its other automated or manual records, particularly if it is going to rely upon automated technology to

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carry out its mission—whether in support of the SAVE project or its other mission-essential projects.

INS recognizes that its Central Index data base can be and needs to be improved, and it intends to do so. In our opinion, however, significant improvement in the Central Index data base is not likely to occur before April 1, 1988, when the appropriate Cabinet Secretaries are required to report to the appropriate congressional committees on whether they should waive the use of the new nationwide verification system. Secretaries of the five federal agencies responsible for administering the entitlement programs may waive the use of the new system if alternative systems are available that are as effective, timely, and provide at least the same hearings and appeals rights to beneficiaries as the nationwide system, or if the cost of using the nationwide system exceeds the benefits. Thus these Secretaries need to know the timeliness and effectiveness of the nationwide system when making these reports.

At this time, INS plans to correct errors in the data base as they are discovered on a case-by-case basis during secondary verification. However, since neither the quality of the Central Index data base nor the magnitude of future secondary verification requests is known, the overall impact of this method on data base quality cannot be determined. Other INS initiatives to improve the Central Index data base—data base validation, user surveys, and statistical studies of reasons for secondary verification—have either just begun or will not be performed until after the nationwide verification system is scheduled to be implemented in October 1987. Except for the corrections planned during secondary verification, no formal corrective action plan exists because these other initiatives are still in the problem-definition stage; accordingly, additional solutions, their feasibility, and their attendant costs have yet to be determined.

To make SAVE more fully responsive to user needs, INS may also have to place additional alien information into the data base. Identification of such additional information is not yet completed, and an analysis of the costs and benefits of adding such data has yet to be accomplished.

Therefore, to ensure that the nationwide SAVE system meets the needs of state and local officials, we recommend that the Commissioner of the Immigration and Naturalization Service:

- develop and implement a formal corrective action plan that clearly identifies both short-term and long-term corrective actions INS plans to take

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to improve the quality and completeness of the data base accessed by the SAVE system, and

- develop statistical and trend data on the magnitude of positive primary verification together with the magnitude, turn-around time, and records corrected during secondary verification.

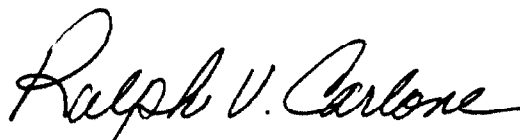
We further recommend that these plans and data be shared with appropriate Cabinet Secretaries in time to support their decisions on whether to waive the use of SAVE because they will be comparing the effectiveness and timeliness of SAVE versus other verification methods.

We provided a draft copy of this report to INS for its review and comment. INS' Deputy Commissioner provided oral comments stating that the agency generally agreed with the report's findings, conclusions, and recommendations. He further stated that INS believes the SAVE program is accomplishing its intended purpose of detecting and preventing aliens with an ineligible status from receiving federal benefits, but improvements could and will be made as outlined in this report. The Deputy Commissioner also offered some technical corrections to the report, which we made where appropriate.

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As arranged with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution of it until 30 days from its issue date. At that time, we will send copies to the appropriate Cabinet Secretaries and other interested parties, and make copies available to others upon request.

If you have any questions about this report, please call James Watts, Associate Director, Information Management and Technology Division, on 275-3455.



Ralph V. Carlone  
Director



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## Abbreviations

CIS	Central Index System
GAO	General Accounting Office
INS	Immigration and Naturalization Service
PRUCOL	Permanently Residing Under Color of Law
SAVE	Systematic Alien Verification for Entitlement





# Briefing on INS' Automated SAVE System

## **Alien Verification Requirements of the Immigration Reform and Control Act of 1986**

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- **INS must provide a nationwide alien verification system by October 1, 1987**
- **Appropriate Cabinet Secretaries must report to the Congress on plans to waive use of INS' system by April 1, 1988**
- **Unless waived, entitlement programs must use INS' system by October 1, 1988**
- **GAO must report on the effectiveness of the SAVE pilot projects by October 1, 1987**
- **GAO must report on nationwide verification system implementation by April 1, 1989**

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## Alien Verification Requirements of the Immigration Reform and Control Act of 1986

The Immigration Reform and Control Act of 1986 requires, in part, that program administrators verify the immigration status of aliens applying for certain federally funded entitlement programs. To assist them in performing this function, the act requires INS to implement a nationwide alien verification system by October 1, 1987. Secretaries of the five federal agencies responsible for administering these entitlement programs, however, may waive use of this nationwide system in two instances: (1) where alternative systems are available and are as effective and timely, and provide at least the same hearings and appeals rights for beneficiaries as the nationwide system; or (2) where the cost of using the nationwide system exceeds the benefits. The Secretaries are required to report to the appropriate congressional committees by April 1, 1988, on the appropriateness and cost effectiveness of the nationwide system and whether there should be waivers. States and other users then have until October 1, 1988, to begin using the nationwide verification system unless a waiver is obtained.

The act also requires GAO to report on the effectiveness of the current pilot projects that use an automated verification system or some other alternative. These projects are known as the Systematic Alien Verification for Entitlement (SAVE)<sup>2</sup> projects. GAO's report on these pilot projects is due by October 1, 1987, the same date INS' verification system is to be implemented. We performed a limited review of the automated aspects of these pilot projects to provide both the Congress and INS with information for use in developing the new nationwide verification system. This report summarizes the results of that limited review. GAO is also required to report on the implementation of the nationwide verification system by April 1, 1989, and include recommendations for changes in the system that may be appropriate.

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<sup>2</sup>The act refers to SAVE as the System for Alien Verification of Eligibility.

## Audit Objectives, Scope, and Methodology

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- **Objectives**
  - To determine whether the system used during the SAVE pilot projects was accurate, complete, and reliable, and if not, whether INS had plans to address these issues during the development of the nationwide system
- **Scope**
  - Focused only on the effectiveness of the automated portion of the SAVE system
- **Methodology**
  - Reviewed system documentation and discussed system's operation with INS staff
  - Discussed system's operation with major users
  - Observed verification process in Florida, Illinois, and Colorado

## Audit Objectives, Scope, and Methodology

Our work on this project was limited solely to the effectiveness of the automated portion of the alien verification system. Our objectives were to determine whether the system used during the SAVE pilot projects was accurate, complete, and reliable, and if not, whether INS had plans to address these issues during the development of the nationwide verification system.

To accomplish this objective, we met with appropriate officials at INS' Central Office, and personnel responsible for SAVE pilot projects in INS' Chicago, Denver, and Miami District Offices. We also obtained and analyzed the Management Plan and Acquisition Strategy for the nationwide system.

To obtain the views of experienced users of the automated verification system, we met with personnel from state agencies in Florida, Illinois, and Colorado. These states were selected because they have the most experience in using state personnel to directly access INS' automated system. We observed SAVE project operations in these states, and the handling of cases referred to INS by these states because the automated system could not positively verify an alien's legal status (a process known as secondary verification; see p. 19). We also analyzed SAVE project statistical reports filed by these states and the Commonwealth of Puerto Rico.

Finally, we discussed SAVE projects and alien verification provisions of the Immigration Reform and Control Act of 1986 with appropriate officials from the National Governors Association, and with officials from the Departments of Labor, Agriculture, Health and Human Services, Education, and Housing and Urban Development.

During this review we did not obtain detailed information on the costs and benefits of the SAVE projects, nor did we evaluate alien verification procedures in states that do not access the automated system. We also did not evaluate the accuracy of the positive alien verification generated from the automated system. In addition, we did not evaluate the specific security and privacy measures governing the access to and use of immigration information. Our office will issue another report as required by the act, containing the experiences of pilot participants, and the status of agency actions to implement the act, including access and use of immigration information.

Our audit was performed between October 1986, and May 1987, using generally accepted government auditing standards.

## **What Is Systematic Alien Verification for Entitlements (SAVE) ?**

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- **Verifies alien status**
  
- **Entitlement programs**
  - **Aid to Families with Dependent Children**
  - **Medicaid**
  - **Adult Assistance**
  - **Unemployment Compensation**
  - **Food Stamps**
  - **Housing Assistance**
  - **Education Assistance**

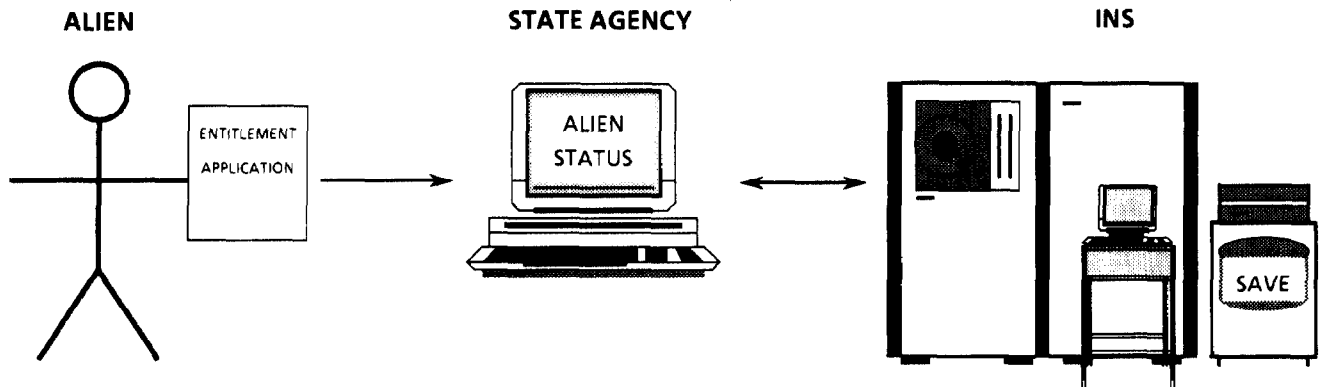
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## What Is Systematic Alien Verification for Entitlement (SAVE)?

INS' SAVE pilot project used an automated verification system to assist state entitlement agencies in verifying the immigration status of aliens. A similar nationwide system is required by the Immigration Reform and Control Act of 1986. The verification functions of the nationwide system are to be used to document immigration status when aliens apply for one or more of the following benefits:

- Aid to Families with Dependent Children (Department of Health and Human Services),
- Medicaid (Department of Health and Human Services),
- Adult Assistance Programs (Department of Health and Human Services),
- Unemployment Compensation (Department of Labor),
- Food Stamp Program (Department of Agriculture),
- Housing Assistance Programs (Department of Housing and Urban Development), and
- Higher Education Assistance Programs (Department of Education).

### How Does SAVE Work ?





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**How Does SAVE Work?**

Aliens apply in the usual manner to the state or local agency for benefits. State or local agency employees use a terminal or other input device to check the status of alien applicants against the SAVE system containing immigration records. If this query shows that INS has no record, or the alien's legal status cannot be positively verified, agency employees request further verification and forward a copy of the applicant's alien documentation if available.

### Data Available From SAVE

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- Only a subset of INS' Central Index System can be accessed
- Records can only be accessed using an A-number
- Accessible data elements:
  - A-number
  - Name
  - Date of birth
  - Social Security number
  - Date of entry
  - Port of entry
  - File control office
  - Country of birth
  - Class of admission

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**Data Available From SAVE**

Data available to states currently participating in SAVE projects are limited to a specific subset of the total information contained in INS' Central Index System (CIS). The CIS is INS' main data base containing limited information on aliens, and references to other automated data bases and paper files containing additional information. The subset of CIS, which SAVE participants access, consists of immigration status information that INS deems necessary to assist entitlement agencies in making eligibility decisions.

Access to this information can only be obtained by using the alien number (A-number) given to the alien at registration with INS, and provided to program administrators by the alien applying for benefits. The purpose of this limited access is to prevent improper invasions of privacy or improper disclosure of INS data to the state agencies or other users. Users with access to SAVE information during the pilot projects are required to maintain a federal security clearance. Audits of system and site security are performed by INS staff on a periodic basis.

Accessible data elements include such items as name, date of birth, Social Security number, date and place of entry into the United States, INS office possessing the alien's file, country of birth, and immigration status.

## Types of Verification

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- **Primary verification:**
  - **Performed by program employees accessing automated SAVE system**
  - **Results in either verification of alien status or secondary verification**
- **Secondary verification:**
  - **Performed by INS staff**
  - **Other data sources and access methods used**
  - **Results in verification of alien status**

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## Types of Verification

Two types of verification can occur during the SAVE process— primary verification, which is performed by state or local agency personnel, and if necessary, secondary verification, which is performed by INS personnel.

The verification process begins when applicants for entitlement benefits indicate that they are not United States citizens. Once non-citizenship is declared, the alien is asked to provide documentation showing alien status. Various forms of documentation can be provided—for example, an alien registration or residence card (“green card”), or an arrival/departure record. The SAVE system is then accessed and will either, in a matter of seconds, instruct the state or local agency employee that the alien is a permanent resident and eligible to work, or that a secondary verification is needed because of insufficient data or indications that the alien may be in an illegal status. If the alien cannot provide documentation showing alien status, or the information produced by the system is different than that shown on the documents provided by the applicant, a secondary verification is requested.

Secondary verification is requested by the state or local agency employee by completing a special form, and if available, photocopying the alien's immigration documentation and sending it to the local INS office. INS personnel then access other immigration records, such as the alien's paper file, to make a status determination. According to entitlement agency officials that we visited, secondary verifications generally take 1 to 10 days to complete, depending on the data INS staff need to access. The results of secondary verification are sent to the state or local agency, which uses this immigration status information to make entitlement eligibility decisions.

**Authorized Program Participants**

<b>State / Territory</b>	<b>On - Line (State Equipment)</b>	<b>On - Line (INS Equipment)</b>	<b>Mail - In</b>
California	●		
Colorado	●		
Florida	●		
Guam			●
Idaho			●
Illinois		●	
Indiana		●	
Montana			●
Puerto Rico		●	
Virgin Islands			●

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## Authorized Program Participants

According to INS, 10 entities are participating in SAVE pilot projects; of these, California, Colorado, and Florida have state-owned equipment capable of directly accessing the SAVE system. Although California has obtained the necessary computer equipment to permit direct on-line access, INS officials told us that the state does not currently use it. California officials informed us that they were initially prevented from using this equipment because of a lawsuit over failure to follow proper procedures in issuing administrative regulations. With the passage of the Immigration Reform and Control Act of 1986, these officials are revising the state's regulations, and will be holding hearings on how the act will be implemented.

State personnel in Illinois, and Indiana, and entitlement personnel in the Commonwealth of Puerto Rico use INS terminals to access the SAVE system. The remaining four states mail their requests to verify alien status to local INS offices.

Puerto Rico and the five states that verify alien status with automated access to INS records do so for a limited number of entitlement programs. Most of the experience to date has been with unemployment compensation; however, Colorado and Puerto Rico also verify applicants for health and social service programs.

**Primary vs. Secondary Verifications (10 /1/ 86 to 3 /31/ 87)  
 Unemployment Compensation**

	Colorado	Florida	Illinois
<b>Number of primary verifications</b>	<b>1825</b>	<b>3537 a/</b>	<b>8064</b>
<b>Number of secondary verifications</b>	<b>166</b>	<b>2426</b>	<b>1516</b>
<b>Percentage sent to secondary verifications</b>	<b>9.1%</b>	<b>68.6%</b>	<b>18.9%</b>
<b>Percentage of secondary verifications identifying illegal status</b>	<b>29.5%</b>	<b>3.9%</b>	<b>38.3%</b>
<b>Percentage of secondary verifications identifying legal status</b>	<b>70.5%</b>	<b>96.1%</b>	<b>61.7%</b>

a/ Florida verifies only aliens without "green cards"



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**Primary vs. Secondary Verifications (10/1/86 to 3/31/87) Unemployment Compensation**

We reviewed statistical information on the number of primary and secondary verifications for unemployment compensation applications in the states of Colorado, Florida, and Illinois. Our analysis included data collected by state officials for a 6-month period from October 1, 1986, to April 1, 1987.

In Colorado and Illinois, over 90 and 80 percent, respectively, of the aliens verified by state personnel were identified as having legal status during primary verification. In the case of Florida, about 30 percent of the aliens verified were identified as having legal status. Florida officials told us that they currently verify only aliens without "green cards" (an INS document showing the permanent residence status of an alien). Officials stated that aliens with "green cards" are presumed to be eligible for benefits, since a pilot study in Miami has demonstrated that the vast majority of aliens with "green cards" are in a legal immigration status.

Of the secondary verifications that were performed, approximately 30 percent (49 cases) in Colorado, 4 percent (104 cases) in Florida, and 38 percent (581 cases) in Illinois were found to have illegal status and therefore were not eligible for benefits. However, in all three states the majority of aliens referred to INS for secondary verification were in fact found by INS to have legal status. Approximately 96 percent (2322 cases) of the secondary verifications performed for the state of Florida were found to have legal status, while approximately 70 percent (117 cases) and 62 percent (935 cases) in Colorado and Illinois respectively were also found to have legal status.

**Primary vs. Secondary Verifications (10 /1/ 86 to 3 /31/ 87)  
 Social Service Programs**

	Colorado	Puerto Rico
<b>Number of primary verifications</b>	<b>2155</b>	<b>11,216</b>
<b>Number of secondary verifications</b>	<b>520</b>	<b>1004</b>
<b>Percentage sent to secondary verification</b>	<b>24.1%</b>	<b>9.0%</b>
<b>Percentage of secondary verifications identifying illegal status</b>	<b>a/</b>	<b>16.1%</b>
<b>Percentage of secondary verifications identifying legal status</b>	<b>a/</b>	<b>83.9%</b>

a/ This information was not available for analysis.

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Primary vs. Secondary  
Verifications (10/1/86 to  
3/31/87) Social Service  
Programs

We reviewed statistical information on the number of primary and secondary verifications for social service applications in the state of Colorado and the Commonwealth of Puerto Rico. Our analysis included data collected by state and INS officials for a 6-month period from October 1, 1986, to April 1, 1987.

In Colorado and Puerto Rico, over 75 percent and 90 percent, respectively, of the aliens verified by state and commonwealth personnel were identified as having legal status during primary verification.

Of the secondary verifications that were performed, approximately 16 percent (162 cases) of the aliens referred in Puerto Rico were found to be in illegal status and therefore not eligible for benefits. However, approximately 84 percent (842 cases) of the aliens referred for secondary verification were in fact found by INS to have legal status. In the state of Colorado, this information was not available for analysis.

### **Reasons for Secondary Verifications of Eligible Aliens**

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- **Need for additional class of admission codes (47 cases)**
- **SAVE data not always complete, accurate, or up-to-date (28 cases)**
- **Additional data needed by states for unemployment compensation (7 cases)**
- **Administrative errors (7 cases)**
- **Status of aliens Permanently Residing Under Color of Law (PRUCOL) cannot be determined (4 cases)**

## Reasons for Secondary Verifications of Eligible Aliens

In April 1987, we visited INS' Denver, Chicago, and Miami District Offices to determine why secondary verification was necessary. We observed 107 cases which, although not randomly selected or statistically projectable, give some possible reasons for the secondary verification process. In 14 of the cases we observed, the alien was in an ineligible status. Of the remaining 93 cases, we noted:

- 47 cases in which the CIS data base did not include a special code in the record of those aliens who are Cuban-Haitian entrants and are authorized to work in this country and to receive various entitlement benefits. Thus SAVE could not make a positive verification of Cubans and Haitians during primary verification. INS officials informed us that status codes for Cuban-Haitian entrants have recently been approved but have yet to be entered into the CIS data base. The exact number of Cuban-Haitian entrants in the CIS data base is unknown, but INS officials believe it may be over 100,000. INS officials told us they intend to make a one-time update of the CIS data base to add the proper status code for Cuban-Haitians. However, as of August 14, 1987, the update had not been done, nor had a formal plan been developed assessing the feasibility of a one-time update or identifying the procedures for doing so.
- 28 cases in which the CIS record for an alien with a valid legal status was missing, inaccurate, or had not been updated to reflect a change in the applicant's immigration status. In 8 of these cases, hard copy information on aliens who entered the country prior to 1957 has not been entered into the CIS data base because INS determined several years ago when it created the CIS data base that it was not worthwhile to enter these old records.
- 7 cases in which secondary verification was required to determine the alien's status during the unemployment compensation base period. Knowing an alien's legal status during the entire base period becomes necessary since unemployment compensation benefits are accrued over a period of time and federal law requires that an alien be eligible to work during the entire period. Since CIS shows only an alien's current legal status, secondary verification is needed to determine if an alien's status changed at any time after he or she first became eligible to work in this country.
- 7 cases in which the A-number had been mis-copied or mis-keyed by the alien applicant or the state official performing primary verification.
- 4 cases in which SAVE could not positively verify during primary verification aliens who are classified as "permanently residing under color of law" (PRUCOL). Even though these aliens are included in the CIS data base, their individual records in the data base do not include a code showing they have legal status because, according to INS officials, these

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aliens do not have legal status under existing immigration law. Nonetheless, these aliens are entitled to remain in the United States, be employed, and are entitled to benefits as a result of judicial decisions in lawsuits brought in both federal and state courts.

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**Appendix**  
**Briefing on INS' Automated SAVE System**

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### **INS Recognizes That System Could Be Improved**

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- **Quality assurance program will validate data base accuracy**
  - **Users will be surveyed to determine areas for improvement**
  - **Reasons for secondary verification will be identified and analyzed**
  - **System will be enhanced based on analysis of the above efforts**
- **Secondary verifications will be used to correct data base**



## INS Recognizes That System Could Be Improved

INS officials informed us that they are aware of the problems with the data base accessed by SAVE projects. As a result, INS has directed its Quality Assurance Branch to identify corrective actions. In addition, we have noted that INS' acquisition plans and system requirements demonstrate that potential improvement initiatives have been identified by INS and are being pursued, including validation of the data base, analysis of the reasons for secondary verification, and use of secondary verification results to correct the CIS.

The Quality Assurance Branch is performing a data base validation of the CIS and plans further validation once the new nationwide verification system is up and running. INS also anticipates expansion of the verification data base to include information from other INS automated files. In addition, the branch has recently surveyed INS users of the CIS to gain a full understanding of problems encountered and is currently analyzing these responses. We were informed by INS officials that once the new verification system becomes operational, complaints and identification of problems will be solicited from users. This information will be used to assist INS in monitoring contractor performance and to ensure maximum effectiveness to the user community.

INS officials also stated that the Quality Assurance Branch will be responsible for reviewing statistical data regarding the causes for secondary verifications and these statistics will be used to provide a basis for corrective actions. The first review is scheduled to be performed 90 days after system implementation, which is planned for October 1, 1987. According to INS' acquisition plans, if this review indicates that erroneous and missing data in the verification data base is the primary cause, then actions will be taken to improve data base integrity. In addition, the plan states that if procedural errors by entitlement agency personnel are a problem, then appropriate training and information dissemination measures will be implemented. The cost and milestones for improving the data base will be determined after the specific causes for errors or omissions have been determined.

INS officials also point out that 80 documentation specialists are being hired to handle the anticipated increase in secondary verification requests resulting from the new act, but the use of the new system by state and local agencies and the amount of secondary verifications is unknown. These personnel will also be responsible for correcting the CIS when a secondary verification search reveals that the data base is in error.

## Conclusions

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- Limited use of SAVE shows it provides timely responses in majority of cases, and is identifying aliens in illegal status
- Room for improvement in the SAVE data base exists
- Significant improvement in the SAVE data base is not likely prior to waiver decisions
- Overall impact of improving data quality based on secondary verifications cannot be determined
- Other INS initiatives are in the problem identification stage
- Additional data may be needed and cost to improve SAVE data base is unknown

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## Conclusions

Our review of the limited use of the automated verification system by three states and statistics from the Commonwealth of Puerto Rico shows that the system provides timely responses in the majority of the cases and is identifying aliens in an ineligible status who are applying for entitlement benefits. However, the experience of these users also shows that there is considerable room for improving the accuracy and reliability of the system's data base because about 62 to 96 percent of the applicants referred to secondary verification for further, mostly manual processing, in fact have legal status according to official INS records. The immigration status of the applicants could have been verified more quickly and economically during primary verification if the data base were more complete and accurate.

Although our work was limited, it does show that the automated system could not automatically verify the legal status of these applicants because the Central Index data base either lacked sufficient information on legal aliens (for example, the admission status of Cuban-Haitians and PRUCOL aliens) or it was otherwise incomplete, inaccurate, or not up-to-date. Since INS maintains official U.S. records on aliens, its Central Index should accurately and completely reflect its other automated or manual records, particularly if it is going to rely upon automated technology to carry out its mission—whether in support of the SAVE project or its other mission-essential projects.

INS recognizes that its Central Index data base can be and needs to be improved and it intends to do so. In our opinion, however, significant improvement in the Central Index data base is not likely to occur before April 1, 1988, when the appropriate Cabinet Secretaries are required to report to the appropriate congressional committees concerning whether there should be waivers. At this time INS plans to correct errors in the data base as they are discovered on a case-by-case basis during secondary verification. However, since neither the quality of the CIS data base nor the magnitude of future secondary verification requests is known, the overall impact of this method on data base quality cannot be determined.

Other INS initiatives to improve the Central Index data base—data base validation, user surveys, and statistical studies of reasons for secondary verification—have either just begun or will not be performed until after the nationwide verification system has been implemented in October 1987. Except for the corrections planned during secondary verification, no formal corrective action plan exists because these other initiatives

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are still in the problem definition stage; accordingly, additional solutions, their feasibility, and their attendant costs have yet to be determined.

To make the nationwide verification system more fully responsive to user needs, INS may also have to place more data into the data base, such as information on the unemployment compensation base period for an alien and the status of a PRUCOL alien. Identification of such additional information is not yet completed, and an analysis of the costs and benefits of adding such data has yet to be accomplished.

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**Appendix**  
**Briefing on INS' Automated SAVE System**

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## Recommendations

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- **The Commissioner of INS should develop**
  - **a formal corrective action plan identifying both short- and long-term cost effective actions to improve quality and completeness of SAVE data base, and**
  - **statistical and trend data on the magnitude of primary verifications with magnitude, turn-around-time, and records corrected during secondary verification.**
- **This information should be shared with appropriate Cabinet Secretaries in time to support their waiver decisions.**

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## Recommendations

In order to ensure that INS' automated verification system meets the needs of state and local officials, we recommend that the Commissioner of the Immigration and Naturalization Service develop:

- a formal corrective action plan that clearly identifies both short-term and long-term corrective actions INS plans to take to improve the quality and completeness of the verification data base, and
- statistical and trend data on the magnitude of positive primary verifications together with the magnitude, turn-around time, and records corrected during secondary verification.

We further recommend that this information be shared with appropriate Cabinet Secretaries in time to support their decisions on whether to waive the use of the nationwide verification system because they will be comparing the effectiveness and timeliness of this system versus other verification methods. If the new automated verification system is widely used by state and local program administrators, then the increased work load generated by the volume of secondary verifications could have a significant impact on INS' staff resources and adversely affect the turn-around time on secondary verification. Thus, this information will also be useful to INS management in monitoring the effectiveness of the system and assessing the need for further corrective actions.





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