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IMMIGRATION REFORM

Alien Verification System Data Base Problems and Corrective Actions



Information Management and
Technology Division

B-227265

June 26, 1989

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

The Honorable Bruce A. Morrison
Chairman, Subcommittee on Immigration,
Refugees and International Law
Committee on the Judiciary
House of Representatives

The Immigration Reform and Control Act of 1986 required the Immigration and Naturalization Service (INS) to implement a nationwide system for use in verifying the immigration status of aliens applying for benefits under certain entitlement programs.¹ In response to the act, INS made its Systematic Alien Verification for Entitlements (SAVE) program available for verifying the immigration status of aliens. This program consists of both automated and manual means of verification. Also as required by the act, we recently reported on the implementation of the program.²

This letter supplements that report and is being sent to you in light of your respective Subcommittees' continuing interest in immigration matters. Our objective in this review was to determine whether the data base used for the automated portion of the SAVE program is complete and accurately reflects the information contained in INS' hard-copy files. To make this determination, we analyzed a nonprojectable sample of 648 records of aliens from the six states with the largest alien populations.³

¹These programs and their administering federal agencies are: Aid to Families With Dependent Children, Medicaid, and adult assistance (Department of Health and Human Services); Unemployment Compensation (Department of Labor); Food Stamps (Department of Agriculture); and certain housing (Department of Housing and Urban Development) and educational (Department of Education) assistance programs.

²The program's implementation was addressed in a report entitled Immigration Reform: Federal Programs Show Progress in Implementing Alien Verification Systems (GAO/HRD-89-62, Mar. 31, 1989).

³These records, which comprise SAVE, contain data elements from INS' Central Index System. This system maintains automated records of all aliens of interest to INS and serves as an indicator to other automated systems. The extracted data elements are the alien's first and last name, A-number (identification number), date and country of birth, date of entry into the United States, social security number (when available), and class of admission code (an alphanumeric code that describes alien immigration status).

In addition, we interviewed SAVE program officials and examined available documentation. A detailed description of our objectives, scope, and methodology is contained in appendix I.

INS has been aware since 1984 that the automated data base used for SAVE lacks complete and accurate information. Our analysis of records obtained from a September 1988 sample indicated that this situation still existed. We noted, for example, instances where data were either omitted or were in error, and therefore insufficient for providing alien status verification. INS has made attempts to correct these problems, and such efforts are resulting in a more complete and accurate data base. The agency expects that further improvement in the quality of SAVE data will result from future initiatives. We are not making any recommendations since the agency is aware of the problems and is taking corrective action.

Background

SAVE was created by INS in 1984 as a means through which federal, state, and local entitlement agencies could—on a voluntary basis—verify an alien's immigration status. The Immigration Reform and Control Act of 1986 required certain entitlement programs to begin using SAVE by October 1, 1988.⁴ In a process known as primary verification, agencies access the SAVE data base and receive either positive verification that an alien has legal status, or instructions to initiate secondary verification. Secondary verification is required when data are insufficient to determine immigration status, or indications exist that the alien might be in this country illegally. In making a secondary verification, INS employees manually research hard-copy files and make inquiries into other automated data bases to verify an alien's legal status.⁵ This status is then communicated back to the entitlement agency, which determines eligibility for benefits.

Prior to passage of the act, the National Governors' Association, state representatives, and public interest groups raised concerns that SAVE data were often incomplete and inaccurate. The Inspector General of the

⁴The act refers to SAVE as the System for Alien Verification of Eligibility. Under the act a waiver can be granted where (1) alternative systems are available that are as effective and timely, and provide at least the same hearing and appeal rights for the beneficiaries as the nationwide system; or (2) the cost of using the nationwide system exceeds the benefits.

⁵Other data bases include the Central Index System and the Non-Immigrant Information System, which tracks the arrival and departure status of non-immigrant aliens, and the Student/Schools System, which is an on-line file of foreign students in U.S. academic and vocational educational institutions.

Department of Health and Human Services, in a February 1987 report, reemphasized these concerns and indicated that states, as a result, were reluctant to participate in SAVE.⁶

Our September 1987 report raised similar concerns.⁷ In that report, we noted that there was considerable room for improving the completeness and accuracy of the data base. At that time 9 to 69 percent of primary verification queries by selected entitlement agencies were resulting in a need for secondary verification. We recommended that INS take several actions to improve the completeness and quality of SAVE data.

SAVE Data Base Omissions and Errors

Although INS has been aware of SAVE data base problems for some time, our analysis showed that data omissions and errors still existed as of September 22, 1988, the date of our sample. Some data elements needed to help users perform primary verifications, for example, were frequently omitted. In particular, the INS status or class of admission code was missing in about 20 percent of our 648 sample records. This code is a critical element because it denotes legal status conferred by immigration law and, if missing, requires secondary verification. The date of entry element was also missing in 14 percent of our sample records. This element represents an alien's most recent date of entry into the United States or the date admitted as a lawful permanent resident.

To determine the accuracy of data in the automated data base, we analyzed 296 hard-copy records (of our 648 sample records) at INS' three largest file control offices—Los Angeles, New York, and San Francisco. We considered data base errors to be any instances where information in the automated records differed significantly from the hard-copy files. Slight differences such as misspelled names were not counted as errors. Of the 296 records analyzed, 264 had information in the date of entry data element. Of these, 20 (about 8 percent) were in error. Our analysis further showed that 246 of these same records had information in the status code data element. Of this amount, 27 (about 11 percent) were incorrect. If these data elements are in error, primary verification can erroneously show an alien in a legal or illegal immigration status or the

⁶ Alien Verification For Entitlements, Department of Health and Human Services, Office of Inspector General, Office of Analysis and Inspections, February 1987.

⁷ Immigration Reform: Systematic Alien Verification System Could Be Improved (GAO/IMTEC-87-45BR, Sept. 30, 1987). A companion report was issued in October 1987 that examined the implementation and effectiveness of INS pilot projects for SAVE. This report was entitled Immigration Reform: Verifying the Status of Aliens Applying for Federal Benefits (GAO/HRD-88-7, Oct. 1, 1987).

transaction could go to a secondary verification, which would be unnecessary if these data elements were correct.

INS' Actions to Improve SAVE

Since our September 1987 report, INS has taken steps to improve the completeness and accuracy of the SAVE data base.⁸ These steps include entering missing information and correcting errors. For example, to enhance the completeness of its data base, INS added previously omitted records for Cuban and Haitian refugees. Other actions focused on improving the accuracy of class of admission codes, which are critical in determining an alien's eligibility for entitlement benefits. According to INS' Associate Commissioner for Information Systems, the ultimate objective of these and other actions is to have no errors in the data base.

Additional action recently taken to improve SAVE includes redefining (in February 1989) the class of admission code for aliens under the legalization program established by the Immigration Reform and Control Act. Under the act, aliens who are able to prove they have been in the United States since January 1, 1982, can apply for amnesty and become legalized aliens. As of June 1988, the SAVE data base included records for about 1.7 million such individuals. Before INS redefined the admission code, amnesty applicants were assigned a code that indicated that a determination of amnesty was pending, which automatically required a secondary verification. By redefining the code, a primary verification query will now produce a message that "legalization application is pending and the alien is temporarily authorized to work." This change should eliminate a major cause of secondary verifications. The previous code, for example, generated approximately 24 percent of the queries sent to secondary verification in November 1988.

According to INS officials, these actions are having some positive results, as indicated by a continual decrease in the number of secondary verifications. Between October 1988 and February 1989, referrals to secondary verification dropped from 34 percent of total queries to 17 percent, as shown in table I.

⁸GAO/IMTEC-87-45BR, Sept. 30, 1987.

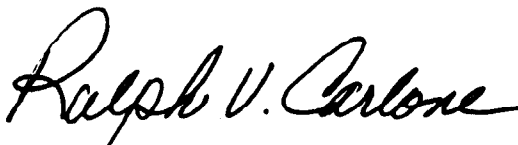
Table 1: SAVE Queries and Secondary Verifications, October 1988 Through February 1989

Month	Total queries	Total referrals to secondary	Percentage
October	91,556	30,961	34
November	145,394	44,258	30
December	135,152	33,141	25
January	139,449	31,141	22
February	155,180	26,190	17

In addition to these actions, INS has begun gathering data on the causes of secondary verifications and identifying data elements needing correction, as we recommended in 1987. To gather data on the causes of secondary verification, 26 INS field offices are recording the causes, time taken to complete secondary verifications, and corrections made as a result of secondary verification. Collection of these data began in December 1988, and is planned to continue for 8 months. According to INS officials, these statistics will enable them to analyze trends in secondary verification and to plan future corrective actions to improve SAVE data quality.

In light of the actions INS has initiated to improve SAVE, which are beginning to show positive results, we are making no recommendations. INS officials, in discussing a draft of this report, stated that they generally agree with our findings and conclusions. They believe the SAVE program is accomplishing its intended purpose of detecting and preventing aliens with an ineligible status from receiving federal benefits, and that data base improvements are continuing to be made. These officials also offered some technical corrections to the report, which have been made where appropriate.

Copies of this report are being sent to the appropriate House and Senate committees, the Attorney General, the INS Commissioner, and other interested parties. This report was prepared under the direction of James R. Watts, Associate Director. Other major contributors are listed in appendix II.



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Contents

Letter	1
Appendix I Objectives, Scope, and Methodology	8
Appendix II Major Contributors to This Report	10
Table	5

Table 1: SAVE Queries and Secondary Verifications,
October 1988 Through February 1989

Abbreviations

GAO	General Accounting Office
IMTEC	Information Management and Technology Division
INS	Immigration and Naturalization Service
SAVE	Systematic Alien Verification for Entitlements

Objectives, Scope, and Methodology

The Immigration Reform and Control Act of 1986 requires us to review INS' implementation of a nationwide immigration status verification program. This requirement was met in a report entitled Immigration Reform: Federal Programs Show Progress in Implementing Alien Verification Systems (GAO/HRD-89-62, Mar. 31, 1989). To supplement that report, we performed this review to determine whether the data base used for the automated portion of the SAVE program is complete and accurately reflects information contained in INS' hard-copy files. Our work was performed in accordance with generally accepted government auditing standards.

We conducted our review between April 1988 and March 1989 at INS headquarters in Washington, D.C., selected INS file control offices, and headquarters offices of federal departments covered by the act—the Departments of Health and Human Services, Housing and Urban Development, Labor, Agriculture, and Education. In addition, we visited the Louisiana Department of Labor's Office of Employment Security and the Martin Marietta Data Systems facility in Orlando, Florida, where the SAVE data base is maintained and queries are processed.

To accomplish our objectives, we reviewed actions taken by INS to improve the completeness and accuracy of the data base. We interviewed SAVE program officials and examined available documentation on the program's implementation at INS and at the five federal program agencies. We also obtained and reviewed reports showing the monthly usage of the SAVE data base by state program agencies. At the Arlington, Virginia, and New Orleans, Louisiana, file control offices, we observed the general storage requirements for hard-copy alien records, typical methods of updating the SAVE data base, and the performance of secondary verification.

To obtain measures of the completeness and accuracy of data being provided to state agencies, we conducted a data base validation. To perform this validation we selected a nonprojectable sample of 786 records. Of these, 648 represented aliens from 14 file control offices in the 6 largest alien population states—California, New York, Texas, Florida, Illinois, and New Jersey.⁹ These states account for about 60 percent of the records in the data base. Our sample was taken on September 22, 1988. For these 648 sample records, we first performed an overall analysis to

⁹Our sample did not include records assigned for illegal border crossings, apprehensions, investigations, and other related purposes.

determine the incidence of missing data for key data elements. For purposes of this analysis we considered as missing data such anomalies as blanks, zeros, and dashes in the data field. Next, for selected file control offices, we compared data elements in our sample with the corresponding information shown in 296 hard-copy alien files. We considered as errors in the data base any instances where information in the automated records differed significantly from the hard-copy files. Slight differences, such as misspelled names, were not counted as errors. The offices selected for this comparison were Los Angeles, New York, and San Francisco, which are INS' largest file control offices and control about one third of the alien files represented by records in the data base.

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