

January 1992

IMMIGRATION CONTROL

The Central Address File Needs To Be More Accurate



General Government Division**B-232893**

January 23, 1992

**The Honorable Joseph R. Biden, Jr.
Chairman, Committee on the Judiciary
United States Senate****The Honorable Strom Thurmond
Ranking Minority Member
Committee on the Judiciary
United States Senate****The Honorable Jack Brooks
Chairman, Committee on the Judiciary
House of Representatives****The Honorable Hamilton Fish, Jr.
Ranking Minority Member
Committee on the Judiciary
House of Representatives**

This report is being issued in compliance with section 545 of the Immigration Act of 1990, which requires us to assess the adequacy of the Central Address File. This file, also authorized by the act, will be used to record and preserve the names and addresses of aliens in deportation proceedings and their representatives.¹ The Attorney General certified to Congress that the file had been established as of August 13, 1991; however, the law does not permit the file to be fully implemented before 6 months after the certification (i.e., Feb. 13, 1992).

In the interim, the Department of Justice's Executive Office of Immigration Review (EOIR)—the agency that was assigned responsibility by the Attorney General for developing the file—will continue to notify aliens or their representatives of the date and place of their hearings using its automated case tracking system. If aliens are represented, EOIR sends the hearing notice to the representative, if not, EOIR sends the hearing notice to the alien.² EOIR's automated case tracking system was established in 1988 and includes the names and addresses of aliens in deportation proceedings and their representatives. EOIR used this information in its automated system to establish the Central Address File.

¹The Immigration and Nationality Act authorizes the Attorney General to deport aliens who have entered the country illegally, violated a condition of their entry, or been convicted of certain crimes, such as drug trafficking.

²See 8 C.F.R. 292.5.

To meet the report requirement of section 545, we used two randomly selected samples, one of alien addresses and the other of representative addresses at four EOIR field offices—Los Angeles; Miami, Fla.; El Paso, Tex.; and Arlington, Va. We compared the names and addresses in the immigration court files with the Central Address File to determine whether EOIR recorded this information the way it was initially received and updated when changes were reported. We also tested certain technical aspects of the system.

Neither the act nor the legislative history defined criteria for determining the adequacy of the Central Address File. We based our judgement of the accuracy of the Central Address File on (1) our comparison of source data in the immigration court files, including change of address information received from aliens and representatives, with the information in the Central Address File and (2) our assessment of the accuracy of the address information and the potential effect on notices being received.

We did our review between July and October 1991 using generally accepted government auditing standards. The views of responsible agency officials were sought during the course of our work and are incorporated where appropriate. A detailed description of our objectives, scope, and methodology appears in appendix I.

Results in Brief

Because the Central Address File is not yet fully implemented, the results of our review reflect the accuracy of address information in the automated system EOIR now uses to notify aliens about their deportation hearings. Therefore, our results could differ after the system has been fully implemented.

We considered the level of accuracy disclosed by our tests to be inadequate for providing sufficient assurance of proper notification. On the basis of our review of a random sample of 483 alien names and addresses in the Central Address File in 4 EOIR field offices, we estimated that 22 percent of the records in the 4 offices had inaccurately recorded names and/or addresses. In addition, on the basis of our review of a random sample of 443 representative names and addresses in the Central Address File, we estimated that 9 percent of the records in the 4 field offices had inaccurately recorded names and/or addresses.

To estimate the extent of adverse impact that the inaccurate information could have on proper notification, we used our random sample of 483,

which included both represented and nonrepresented aliens. For unrepresented aliens to know about their hearings, EOIR must accurately record the aliens' addresses. However, the ability of represented aliens to know about their hearings is dependent upon EOIR accurately recording the representatives', rather than the aliens', addresses. Combining our results for both categories, we estimated that 12 percent of the 483 aliens may not be notified because of inaccuracies in recording either their names and/or addresses, or the names and/or addresses of their representatives.

Most of the inaccuracies we identified related to not updating alien addresses or the names and addresses of their representatives in the Central Address File. EOIR plans to revise its current procedures so that alien and representative address information is initially entered accurately, and the information is properly updated. EOIR also plans to provide additional training for its staff who have responsibility for accurate data entry. As part of its field office monitoring, EOIR is considering reviewing the Central Address File.

Background

Under current notification procedures, the Immigration and Naturalization Service (INS) obtains alien addresses and provides them to EOIR so it can notify the aliens of their initial deportation hearing. EOIR enters the address information into its automated case tracking system and uses the system to generate a hearing notice. If an alien is represented, EOIR mails the alien's notice to the representative, instead of to the alien. EOIR officials pointed out that immigration judges usually inform aliens verbally about the time and place of their subsequent hearings. If the alien fails to appear for a hearing, an immigration judge may order the alien deported in absentia if (1) notice was sent to an address where the alien resides and (2) INS has established the alien's deportability. However, before ordering an alien deported in absentia, immigration judges generally want assurance that the alien actually received a hearing notice and then failed to appear for the hearing.

The act will revise these procedures by transferring the responsibility from INS to the alien for providing EOIR with address information and any subsequent changes of address.³ Further, the act requires that (1) the Attorney General establish a Central Address File to accurately record the names, addresses, and telephone numbers of aliens and their

³Section 545 of the Immigration Act of 1990 does not specifically authorize aliens' representatives to notify EOIR of their clients' addresses or changes of address. However, 8 C.F.R. 292.5 should allow the aliens' representatives to act in their clients' behalf.

representatives; (2) written notices be sent by certified mail to the alien or the alien's representative; and (3) aliens or their representatives be warned that failure to appear for their hearing may result in the aliens being ordered to be deported. Section 545 further requires the Attorney General to certify to Congress the establishment of the Central Address File, which he did on August 13, 1991, and to wait at least 6 months after such certification before implementing the new procedures.

Under the revised notification procedures, EOIR will continue to enter name and address information into its automated case tracking system and use the system to generate hearing notices. The information in the Central Address File merely reflects the name and address information that is entered into the automated case tracking system. When the Central Address File is fully implemented, the name and address information that appears in it will continue to be the same name and address information that EOIR enters into its automated case tracking system.

Under the revised procedures, section 545 generally requires immigration judges to order aliens deported in absentia when they fail to appear for their hearings if INS establishes that (1) notice was sent to the address provided by the alien, unless the alien did not provide an address, in which case no notice is required, and (2) the alien is deportable. Therefore, an accurate Central Address File is needed so that INS can assure immigration judges that deportation hearing notices were sent to the addresses that were provided by the aliens or their representatives.

Analysis of the Central Address File

In our review of 483 alien names and addresses in 4 EOIR field offices, we found 86 with inaccurately recorded information in the Central Address File. We estimated that these inaccurate records represented 22 percent of the records in those four field offices.⁴ Of the four field offices, Miami had the highest rate of alien address inaccuracies—27 percent—compared to 12 percent for Los Angeles, 18 percent for Arlington, and 13 percent for El Paso. According to an EOIR official, the Miami office had a larger workload caused by an influx of aliens into the region. As a result, its staff had more difficulty entering alien address information.

In addition, our review of 443 representatives' names and addresses in the 4 field offices identified 36 inaccuracies. We estimated that these

⁴This estimate was calculated as a weighted figure and was made with a sampling error of less than 5 percent at the 95-percent confidence level. We estimated that, of the 8,498 alien deportation files in these 4 field offices, there were between 1,466 and 2,314 files with name and/or address errors.

inaccurate records represented 9 percent of the records in the four field offices.⁵

Types of Inaccuracies

In our sample of 483 alien addresses we identified two types of inaccuracies—out-of-date addresses and typographical errors.⁶ Most of the inaccuracies related to not updating alien addresses.⁷

- Sixty of the 86 inaccuracies involved not updating the alien's address. For example, on November 7, 1990, INS informed EOIR that an alien's address was 1800 N.W. 22nd Avenue. On March 18, 1991, the alien submitted a copy of a request for asylum that listed the alien's address as 2700 N.W. South River Drive. The Central Address File was not updated with the most recently reported address.
- Twenty-six of the 86 alien address errors we identified involved typographical inaccuracies. For example, EOIR received the alien's address as 135 N. Olive Street. The address in the Central Address File omitted "North" and appeared as 135 Olive Street.

According to EOIR officials, they did not consider some of the inaccuracies we identified to be errors. They noted that under EOIR's current regulations and procedures, no requirement exists to update an alien's address when that alien is represented by counsel. Since all represented aliens' notices are sent to their representative, this constitutes notice to the alien.

While we agree that notice to the representatives constitutes notice to the aliens, circumstances can change. For example, an alien may dismiss his or her representative or the representative may withdraw from the case. In either of these cases, the alien is no longer represented by that individual. Because EOIR does not update represented aliens' addresses, these aliens may not be notified.

In our sample of 443 representative addresses, we identified 4 types of address inaccuracies—out-of-date representatives' addresses, not recording the name of the most current representative, typographical

⁵This estimate was made with a sampling error of less than 4 percent at the 95-percent confidence level. We estimated that, of the 5,733 represented alien deportation files in these 4 offices, there were between 307 and 721 files with name and/or address errors.

⁶We were unable to estimate the frequency of any of the types of inaccuracies in the four field offices as a whole. The numbers represent only what was found in the specific cases we examined as part of the alien or representative address samples.

⁷Addresses in this report have been changed to protect the privacy of the individuals; however, the examples we cite are illustrative of the types of errors we identified.

errors, and not properly recording the representative's name and address in the Central Address File. Almost half of the 36 inaccuracies related to not updating addresses.

- In 17 cases the address recorded for the representative was not the most current address. For example, the Central Address File recorded one attorney's address as 2100 Mt. Pleasant Street, NW. On April 24, 1991, the attorney filed a notice of appearance that listed her address as 2102 16th Street, NW. We called the attorney, who confirmed that she had moved to the 16th Street address. Five of the 17 cases involved the same attorney.
- In 11 cases the Central Address File did not record the most current representative name and/or address. In four cases, the current representative had a name and address different from the previous representative's. In seven cases, the current representative had the same address as the previous representative.
- In four cases we identified typographical inaccuracies when the information in the Central Address File was not recorded exactly as it had been reported. For example, one attorney filed a notice of appearance that reported his address as 1835 West Flagler Street, Suite 200. The Central Address File recorded the street address but omitted the suite number. In another case the representative reported his zip code as 90010, and the Central Address File recorded it as 9001.
- In four cases the alien's case file indicated that the alien had a representative; however, the representative's name and address were not recorded in the Central Address File.

With regard to not recording the most current representatives' names, EOIR officials said that multiple attorneys from the same law firm may appear at different stages of a proceeding. EOIR considers the law firm as representing the alien. As long as the firm's address is accurately recorded, notice can be properly sent to the firm. Therefore, not updating an attorney's name each time should not be considered an error, according to EOIR officials.

For purposes of our evaluation, we sought to determine if current information was recorded in the Central Address File. The file provides space to record a representative's name; EOIR completed this information by recording either an organization's or an individual's name. In those cases where EOIR recorded an organization's name, we did not consider it to be an error if the organization had not changed. However, if EOIR recorded an individual's name and the case file indicated that a different individual had filed a notice of appearance on behalf of the alien, we

recorded an error because the Central Address File should have been updated.

In its conference report on the Immigration Act of 1990, Congress said it expected the Central Address File to "...accurately reflect whether counsel has filed [a] notice of appearance on behalf of the alien and, if so, whether such notice has become stale through the passage of time or has been withdrawn." If a different counsel with the same address has filed the most recent notice we do not believe that leaving the previous counsel's name in the Central Address File necessarily meets congressional expectations. EOIR assumes that attorneys with the same address are members of the same law firm. While this may be true in some cases, it is possible that attorneys with the same address are not members of the same law firm but share office space. In such situations, a notice that is addressed to the wrong individual at the correct address may not be received by the alien's attorney.

Some Aliens May Not Be Notified About Their Hearings

In our review of 483 alien deportation cases in the 4 field offices, we found 50 cases in which aliens may not be notified about their hearings.⁸ These 50 cases represent 12 percent of the records in those 4 field offices.⁹ Of the 483 cases we sampled, we identified 168 unrepresented aliens, 18 of whom had their names and/or addresses incorrectly recorded in the Central Address File. Since EOIR mails hearing notices directly to unrepresented aliens, these 18 may not be notified. The remaining 315 aliens were represented; representatives for 32 aliens had their names and/or addresses incorrectly recorded in the file. In these cases, since EOIR mails a hearing notice only to the representative, these 32 aliens may not be notified.¹⁰

⁸We were unable to estimate the frequency of any of the types of inaccuracies for unrepresented or represented aliens in the four field offices as a whole. The number of cases represents only what was found in the specific cases we examined.

⁹This estimate was made with a sampling error of less than 4 percent at the 95-percent confidence level. We estimated that, of the 8,498 alien deportation cases in the 4 field offices, there were between 705 and 1,385 cases in which aliens may not be notified about their hearings.

¹⁰According to a representative of the U.S. Postal Service, no criteria exist to determine if a piece of first class mail will be delivered to an addressee. The Postal Service makes every effort to deliver first class mail; however, any inaccuracy related to the addressee's name or address could potentially affect the time required to deliver the piece and could ultimately determine if the piece is delivered to the addressee or returned to the sender. Delivery to the addressee can depend on such factors as the type of error, the extent to which the piece is machine processed, the diligence of postal employees, the familiarity of postal carriers with postal patrons on their routes, and the cooperation of postal patrons in filing change of address notices with their local post offices.

EOIR Plans Improvements

According to EOIR officials, they plan to implement procedures that will fully implement the requirements of the Central Address File and address the issues that we identified during our review. With respect to updating alien and attorney name and address information, EOIR plans to create a change of address form for aliens and their representatives. Currently, there is no form whose sole purpose is to notify EOIR of changes of address for aliens or representatives. Changes of address may appear on multipurpose forms whose primary purpose is to notify the court that (1) a representative is appearing on behalf of an alien; (2) an alien is requesting relief from deportation (e.g., asylum); (3) the alien's representative is seeking a change of venue; or (4) INS has detained or released an alien. For example, aliens' representatives are required to file a notice of appearance with the court on behalf of an alien. The form used primarily for this purpose also provides information on the alien's name and address; the representative's name, address, telephone number, and organizational affiliation; and for the representative only, whether the address represents a change. According to an EOIR official, EOIR administrative staff did not always review the form to identify alien changes of address.

With respect to data entry, EOIR reviews its field offices to improve their case management operations. As part of the review, EOIR staff review the office's adherence to established procedures and examine data accuracy. Generally, each field office is reviewed once every 2 years. EOIR plans to increase its review emphasis to assure that information maintained in the Central Address File is accurate. In addition, EOIR plans to conduct nationwide training for its staff on compliance with the Immigration Act of 1990, including maintenance of the Central Address File.

Conclusions

The act required our opinion on the adequacy of the system before its full implementation. When the Central Address File is fully implemented, EOIR will rely on the address information it contains to notify aliens about their deportation hearings. Consequently, unless the types of inaccuracies we identified in the file are corrected, aliens may not be notified of their hearings.

We cannot conclude that the address system, in effect in October 1991, shows a 22-percent error rate in alien addresses and a 9-percent error rate in the addresses of their representatives is adequate. Although our review was limited to four field offices, typographical errors and out-of-date addresses occurred in the Central Address File in all of the four field

offices we visited. We chose the four offices to achieve a mix of workloads and geographic locations.

In our opinion most of the inaccuracies we identified resulted from EOIR's use of the current procedures rather than those procedures required by section 545. We expressed that view in our report. We also said that if EOIR revises these procedures and properly implements them, as EOIR plans to do, most of the inaccuracies we identified would be eliminated.

If the Central Address File had been fully implemented at the time of our review, these error rates could have resulted in 12 percent of the aliens in the four EOIR field offices not being notified of their deportation hearings. When the Central Address File is fully implemented, name and address accuracy will be crucial to assuring immigration judges that aliens covered by the revised notification procedures had their hearing notices sent to the addresses that they or their representatives provided. If INS cannot establish that the aliens or their representatives were properly notified, immigration judges would be precluded from ordering these aliens deported in absentia when they fail to appear for their hearings. The Immigration Act of 1990 generally requires immigration judges to order aliens deported in absentia if they fail to appear for their hearings.

We believe that the concept of the Central Address File system is sound; however, it remains to be seen whether the system will work as Congress intended. If EOIR implements change of address procedures, trains its staff, and enhances its internal reviews, we believe it will improve the accuracy of the Central Address File. EOIR's plans to revise its change of address procedures focus on the principal type of error we identified in our samples. Specifically, 60 of the 86 alien address inaccuracies and 28 of the 36 representative address inaccuracies related to out-of-date address information in the Central Address File. If EOIR revises its change of address procedures and properly implements them, such future problems should be reduced.

The other actions EOIR is taking, such as increasing field review emphasis on maintaining accurate data in the Central Address File and training its staff, should also reduce inaccuracies.

Agency Comments and Our Evaluation

We discussed the information contained in this report with EOIR officials. The EOIR officials disagreed with our approach and results; consequently they stated that the information contained in our report was inaccurate

and that our conclusions were erroneous. EOIR officials said that their automated information system was completely adequate to properly maintain the Central Address File.

EOIR officials said that in measuring the accuracy of EOIR's automated information system, we held them to standards for the Central Address File that are not currently in place and that EOIR was neither required nor attempting to meet. Therefore, the errors that we identified were not errors under EOIR's current procedures. For example, when an alien is represented, EOIR updates the representative's address and has no need to update the alien's address, since it is the representative who receives the notice.

Because we were required to review the adequacy of the Central Address File before its full implementation, we evaluated the file on the basis of standards that it will be expected to meet when it is fully implemented. While some of the alien address inaccuracies we identified in our sample of 483 alien cases may not be considered to be errors at this time, they would be errors if not corrected when the file is fully implemented. Further, the address inaccuracies we identified in our sample of 443 representative addresses were considered to be errors at that time and would be considered to be errors when the file is fully implemented.

EOIR officials disagreed with the projected error rates we cited. According to these officials, we took four separate random samples and projected the results across the population despite huge deviations between the sample means. They said that the Miami field office results in particular vary from the other cities, and including Miami tends to skew the data and results in an unreliable projection.

In aggregating the data we used standard statistical methods, which included appropriately weighting the sample to recognize that the four field offices had different numbers of cases. We agree with EOIR officials that the Miami field office significantly affected the average. Therefore, we reported the data for all four field offices separately, but using an overall average for those field offices is methodologically correct. Further, errors in the Miami field office were material because of its relative number of cases compared to the other field offices. Therefore, the errors in Miami potentially affected more people.

EOIR officials said that we did not take into account a number of crucial issues. First, we did not study the technical aspects of the automated

information system, which is appropriate and necessary to any report dealing with adequacy. Second, we raised the issue that some aliens might fail to appear for their hearings because of inaccurate address information; however, we did not determine if any of the aliens in our sample failed to appear for a hearing. Since all of the cases in our sample were pending active cases, EOIR believes none of the aliens failed to appear due to inaccurate notices. Third, EOIR officials said that we concentrated on written notices, despite the fact that after the initial hearing occurs, the bulk of its notices are given orally by an immigration judge directly to the alien and/or counsel at the hearing.

With regard to the technical aspects of the system, we tested the completeness of the Central Address File and the reliability of the edit check on the state field, interviewed the responsible EOIR headquarters official and field office staff who use the automated case tracking database, reviewed the Users Field Manual for the database, accessed the automated case tracking system and the Central Address File in each of the four field offices, and observed EOIR field staff using the automated database. These audit tests, interviews, and observations indicated that there were no difficulties with the technical aspects of the Central Address File or the automated case tracking system. We revised the report to more clearly reflect this work.

We did not determine if the aliens or their representatives failed to appear for their hearings because section 545 of the Immigration Act of 1990 tasked us with determining the adequacy of the system, not whether the alien appeared. We focused on written notices because that is the type of notice the Central Address File was designed to provide.

Copies of this report are being sent to the Attorney General, the Director of EOIR, the Commissioner of INS, and other interested parties.

Major contributors to this report are listed in appendix II. If you have any questions about the contents of this report, please call me on (202) 275-8389.

A handwritten signature in cursive script that reads "Lowell Dodge".

Lowell Dodge
Director, Administration
of Justice Issues

Objectives, Scope, and Methodology

Section 545 of the Immigration Act of 1990 requires the Comptroller General to report on the adequacy of the Central Address File after the Attorney General has certified its establishment. The Attorney General certified the establishment of the Central Address File on August 13, 1991. Although the Central Address File has been established, EOIR's internal operating procedures for the file and the revised notification procedures required by the act cannot be implemented before February 13, 1992. Therefore, to meet our reporting requirement, our objective was to determine the accuracy of the name and address information that appeared in the Central Address File before its full implementation.

Neither the act nor the legislative history defined criteria for determining the adequacy of the Central Address File. Therefore, our comparison of source data in the immigration court files, including change of address information received from aliens and representatives, to the information in the Central Address File and our assessment of the accuracy of the address information and the potential effect on notices being received form the basis for our judgment in determining adequacy. For purposes of this evaluation, we considered address information to be accurate if it (1) appeared in the Central Address File exactly as it appeared on the source document in the court files and (2) reflected the most recent information that the immigration court had received. EOIR plans to make changes to its operating procedures that it believes are necessary for the Central Address File to meet the act's requirements. However, the law requires us to review the Central Address File before those changes are made. Nonetheless, after being implemented the system will contain the same address information that we reviewed, and EOIR will use it to notify aliens or their representatives of deportation hearings. Therefore, any inaccuracies we identified through our comparison could continue to exist unless data entry procedures are changed. We did not determine (1) if the address information aliens or their representatives provided was accurate, (2) whether address inaccuracies affected the delivery of the notice, (3) if aliens or their representatives received their hearing notices, (4) whether aliens or their representatives attended their hearings, or (5) the outcome of the proceedings.

With regard to the technical aspects of the system, we tested the completeness of the Central Address File and the reliability of the edit check on the state field, interviewed the responsible EOIR headquarters official and field office staff who use the automated case tracking database, reviewed the Users Field Manual, accessed the automated case

tracking system and the Central Address File in each of the four field offices, and observed EOIR field staff using the automated database.

To determine the accuracy of the data maintained in the Central Address File, we randomly selected samples—one of alien addresses and the other of representative addresses—at the Los Angeles; Miami, Fla.; El Paso, Tex.; and Arlington, Va., EOIR field offices. We judgmentally selected these four locations on the basis of their workloads and geographical dispersion. All of the cases we sampled were open cases that were pending before the immigration court in the four field offices as of August 1, 1991.

We compared the names and addresses on source data in the immigration court files with the information in the Central Address File to determine if EOIR accurately recorded and updated the information. We did not review EOIR's automated case tracking system or other aspects of the notification process that cannot be implemented before February 13, 1992. To determine the completeness of the data, we judgmentally selected a sample of court files at each of the four field offices and checked to ensure they were recorded in the Central Address File.

To obtain a sample of alien addresses, we obtained a random listing of all pending deportation cases as of August 1, 1991, for the four EOIR field offices. The list indicated for each case whether the alien had obtained a representative. We generated a separate random number listing for each EOIR field office. The cases for the alien address sample were determined by matching the numbers on our random number listing against the random sequential list of pending deportation cases for each office. This selection process was followed until we obtained the required number of alien addresses.

To determine the number of cases that would be required for the alien address sample, we obtained workload data for the four selected EOIR field offices on pending deportation cases as of July 24, 1991. Sample sizes were selected in order to achieve a sampling error of 5 percent at the 95-percent confidence level. Our sample size was 483 cases: 130 cases for Los Angeles, 146 cases for Miami, 102 cases for El Paso, and 105 cases for Arlington.

To obtain a sample of representative addresses, we determined how many cases would be required for the sample on the basis of the number of pending deportation cases of represented aliens in each field office as of

July 24, 1991. Our sample size was 443 cases: 123 cases for Los Angeles, 135 cases for Miami, 88 cases for El Paso, and 97 cases for Arlington.

We determined how many cases had already been selected for the alien address sample when the alien had a representative. From this information, we determined the number of additional cases that would need to be selected to meet the required number of cases for the representative address sample. Using the random listing of all pending deportation cases for each of the four field offices and our random number listing, we continued to select those cases in which the alien was represented until the required number of cases for the representative address sample had been met.

After we identified the cases needed for the alien and representative address samples, we obtained a printout from the Central Address File for each case that provided the alien's name, address, and, if represented, the representative's name and address. At each of the four field offices we compared the alien and representative address information from the Central Address File with the name and address information in the court's case file. We reviewed the case file to determine the most currently reported address for the alien, whether or not the alien was represented, and if represented, the name and address for the representative. We compared this information from the case file with the information recorded in the Central Address File and noted any inaccuracies between the two. We also reviewed the aliens' A-numbers (i.e., an 8-digit identification number assigned to each alien by INS) and representatives' telephone numbers. We found that the A-numbers and representatives' telephone numbers that had been provided were accurately recorded in the Central Address File. All estimates to the universe of cases in the four field offices were computed by weighting the results to assure that the estimates accounted for the different numbers of cases in the four field offices. The resulting percentage therefore represented an overall estimate of the frequency of errors found in the universe of all cases in the four field offices.

Regarding those aspects of the Central Address File that are not yet implemented, we interviewed INS and EOIR officials concerning the actions that each plans to take to implement the Central Address File. We did our work at INS and EOIR headquarters and at EOIR field offices in Los Angeles; Miami, Fla.; El Paso, Tex; and Arlington, Va. We also contacted a representative of the United States Postal Service's National Address Information Center to determine if criteria existed that would determine

the deliverability or nondeliverability of first class mail in the event that a name or address was flawed.

At each EOIR field office, we judgmentally selected 25 alien case files from the courtrooms, judges' chambers, interpreters' and administrative staff's desks, and the file room. We checked to determine if these 100 cases were recorded in the Central Address File. All cases were in the Central Address File.

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