

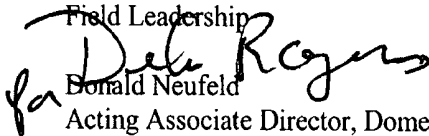


U.S. Citizenship  
and Immigration  
Services

JUN - 5 2009

HQ 70/43

## Memorandum

TO: Field Leadership  
FROM:  Donald Neufeld  
Acting Associate Director, Domestic Operations

SUBJECT: Clarification and Delineation of Vetting and Adjudication Responsibilities for Controlled Application Review and Resolution Program (CARRP) Cases in Domestic Field Offices

### I. Purpose

The purpose of this memorandum is to provide guidance to define the vetting and adjudication responsibilities for Controlled Application Review and Resolution Program (CARRP) cases in the domestic Field Offices. It outlines the distinctions between the duties and responsibilities of Fraud Detection and National Security – Immigration Officer (FDNS-IO) and CARRP-trained Immigration Services Officer (CARRP-ISO). It also explains the roles of Supervisory Immigration Services Officer (SISO) and FDNS-Supervisory Immigration Officer (FDNS-SIO) at each field office.

### II. Background

On April 11, 2008, USCIS released the memorandum, *Policy for Vetting and Adjudicating Cases with National Security Concerns* (CARRP memo). This memo instituted the CARRP process, a disciplined approach for identifying, recording, and adjudicating applications and petitions where a National Security (NS) concern is identified. CARRP involves four unique, but overlapping, processing steps. These include:

1. Identifying a NS Concern
2. Assessing Eligibility in Cases with a NS Concern, consisting of:
  - i. Eligibility Assessment
  - ii. Internal Vetting
3. External Vetting
4. CARRP Adjudication

Moreover, CARRP decentralized the process of vetting and adjudicating cases with NS concerns. Prior to CARRP, all such cases were handled at the Headquarters Office of Fraud Detection and National Security (HQFDNS). With the release of CARRP, responsibility for vetting and

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adjudicating most cases with NS concerns was placed with Field Offices, allowing USCIS to leverage field resources and experienced officers for handling these difficult cases.

After the release of the CARRP memo, Domestic Operations (DomOps), Refugee Affairs Division, International Operations, and the Asylum Division issued separate, but coordinated, Operational Guidance for the implementation of CARRP within their programs. The following guidance is provided to help define the vetting and adjudication responsibilities for CARRP cases in the Domestic Operations Field Offices.

### III. Policy Guidance

The current *Operational Guidance for Vetting and Adjudicating Cases with National Security Concerns (Operational Guidance)*, issued by Domestic Operations, provides general guidelines for the processing of cases with National Security (NS) concerns under CARRP, stating the various steps of the process will be completed by a “designated officer”

While the *Operational Guidance* states that a “designated officer” may be “an Immigration Analyst, Immigration Officer, Adjudications Officer, Asylum Officer or Refugee Officer,” the Office of Field Operations (OFO) is issuing this memorandum in order to establish the assignment of specific CARRP duties and responsibilities to the FDNS-IOs and the CARRP-ISOs who perform CARRP adjudications within each Field and District Office or on temporary duty at a Field or District Office. Per the *Operational Guidance*, a Field Office Director (FOD) will designate a specific Immigration Services Officer(s) to be trained in both CARRP procedures and the use of the Fraud Detection and National Security Data System (FDNS-DS).

In addition, the memorandum entitled, *Actions to be Taken to Standardize CARRP File Identification and the Movement of CARRP Cases Between the Components of USCIS*, dated March 26, 2009, authorizes the FOD to also designate one or more SISOs in each Field Office to perform some or all of the duties described herein for a SISO if he or she chooses. The SISO will play a central role in managing the CARRP process by coordinating the movement of CARRP files, assigning CARRP cases to a CARRP-ISO for adjudication, and providing supervisory concurrence for final adjudication of CARRP cases. Additionally, the FOD will outline local procedures regarding supervision, coordination and actions of the FDNS-IO and CARRP-ISO when there is no FDNS-Supervisory Immigration Officer (FDNS-SIO) located in the Field Office.

#### **Clarification of Duties and Responsibilities within the CARRP Process:**

As mentioned earlier, The *Operational Guidance* breaks down the CARRP process into four steps.

##### **1. Identifying a NS Concern – Step 1 of CARRP Process:**

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More detailed guidelines on completing the identification of a NS concern are available in the *Operational Guidance*, section III.

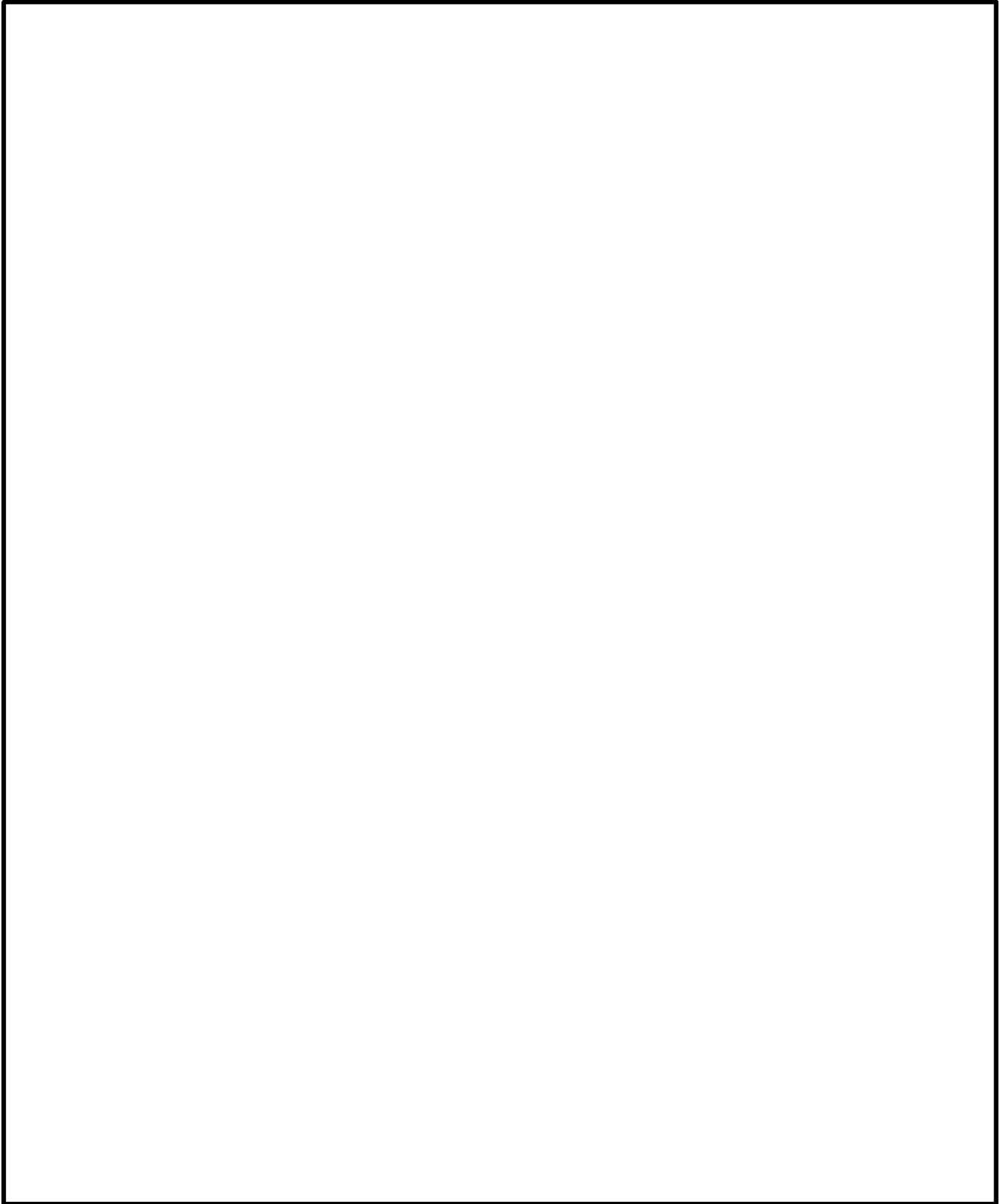
In many instances, CARRP cases received in a Field Office will have gone through Step One of the *Operational Guidance*, "Identifying a NS Concern" at either a Service Center or the National Benefits Center (NBC). In such cases, the SISO overseeing the CARRP process in each Field Office will coordinate with the FDNS-SIO, if available, or follow local procedures to have the case assigned to the appropriate FDNS-IO for Step Two of the *Operational Guidance*, "Assessing Eligibility in Cases with a NS Concern." The SISO will also assign a CARRP-ISO to adjudicate the application or petition in each CARRP case.

**2. Assessing Eligibility in Cases with a NS Concern – Step 2 of CARRP Process:**

Step 2 of the *Operational Guidance* includes both an *eligibility assessment* and *internal vetting* of the CARRP case. The purpose of Step 2 is two-fold: First, it is at this point in the CARRP process where both the FDNS-IO and the CARRP-ISO are required to thoroughly review the case file. The FDNS-IO completes required systems checks and internal vetting, and the CARRP-ISO completes an eligibility assessment of the CARRP case to determine whether any statutory or regulatory ineligibility exist. Second, specific questions and issues are compiled by both the FDNS-IO and the CARRP-ISO for discussion with the Record Owner of the NS hit so that the critical decisions, such as when an interview should be scheduled, can be made regarding adjudicating the application or petition.

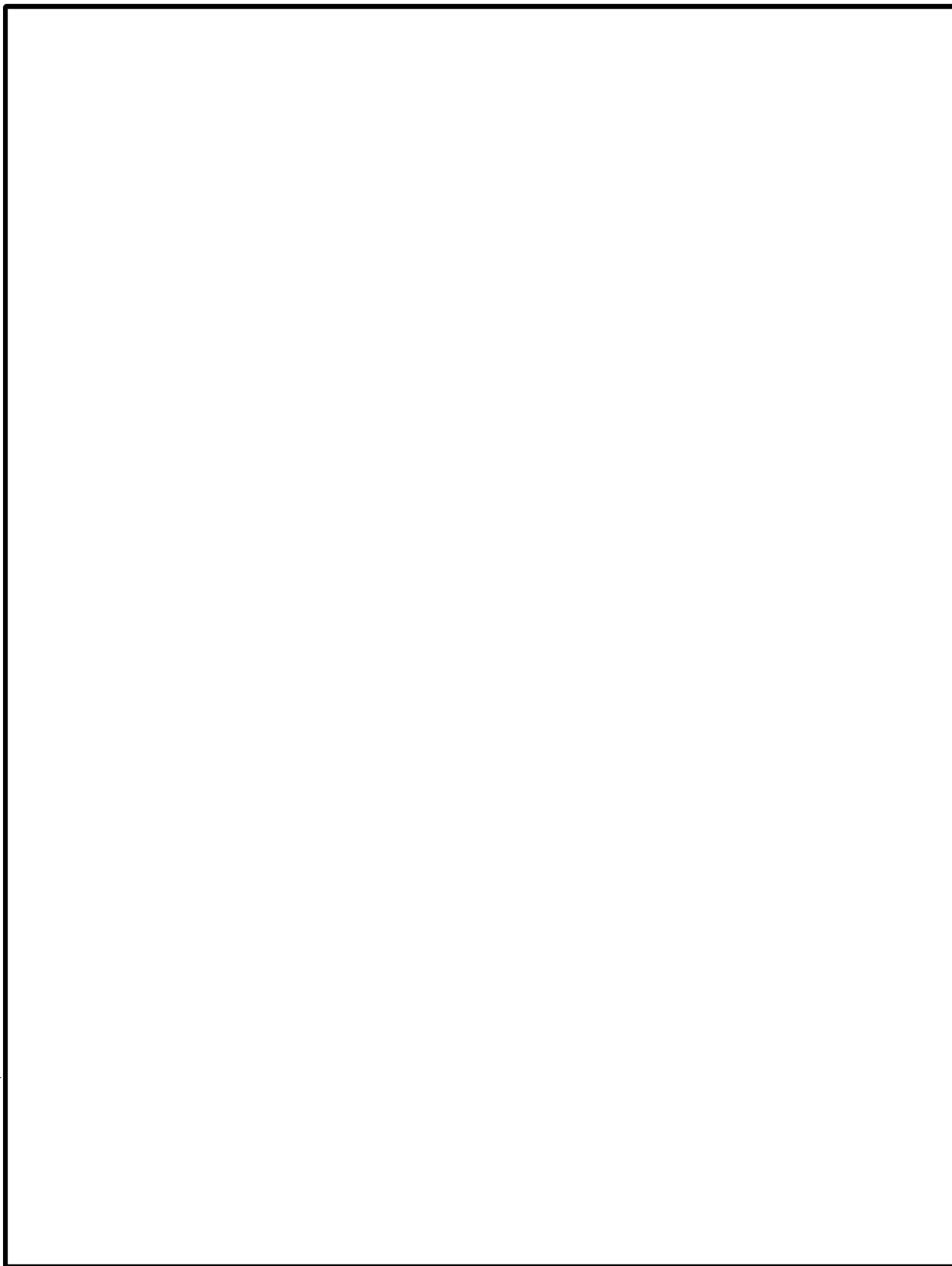
The FOD in each Field Office will decide on the workflow of the CARRP case for this step of the CARRP process. More detail about the features of the elements of step two are described below:

(b)(7)(e) Clarification and delineation of vetting and adjudication responsibilities for CARRP cases in Domestic Field Offices.



Clarification and delineation of vetting and adjudication responsibilities for CARRP cases in Domestic Field Offices.

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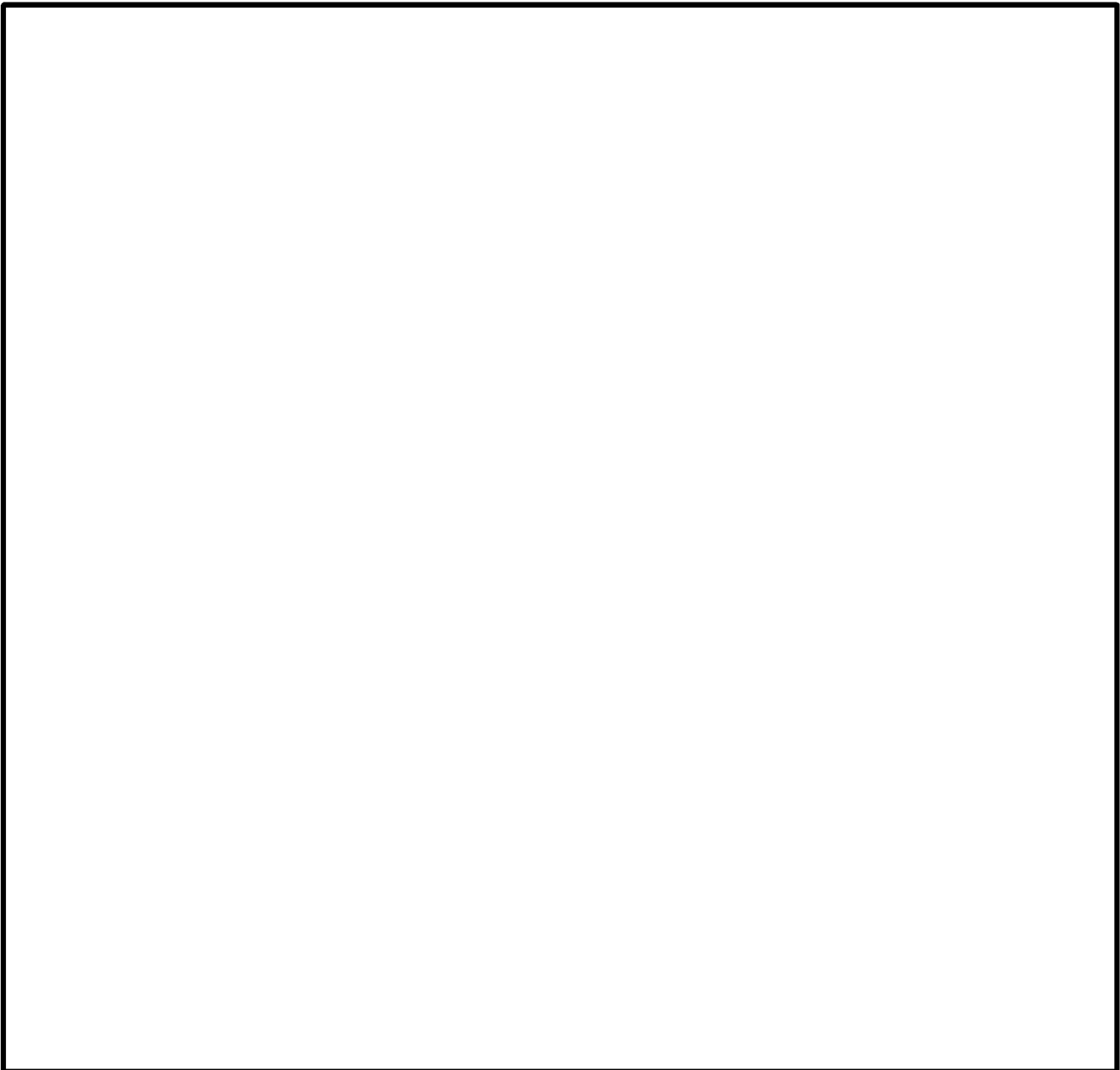
Clarification and delineation of vetting and adjudication responsibilities for CARRP cases in Domestic Field Offices.

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**3. External Vetting – Step 3 of CARRP Process:**

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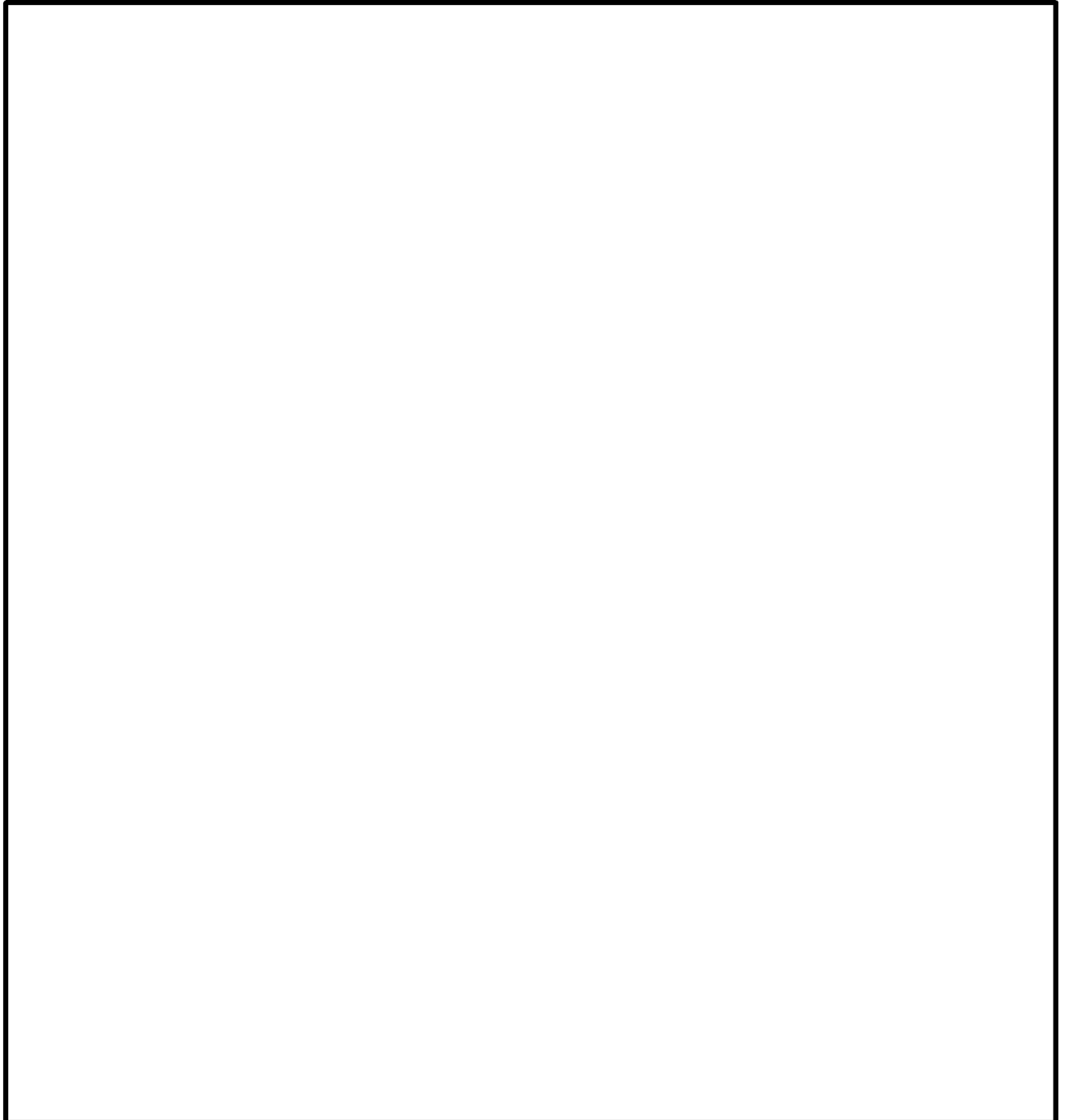


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**4. CARRP Adjudication – Step 4 of CARRP Process:**

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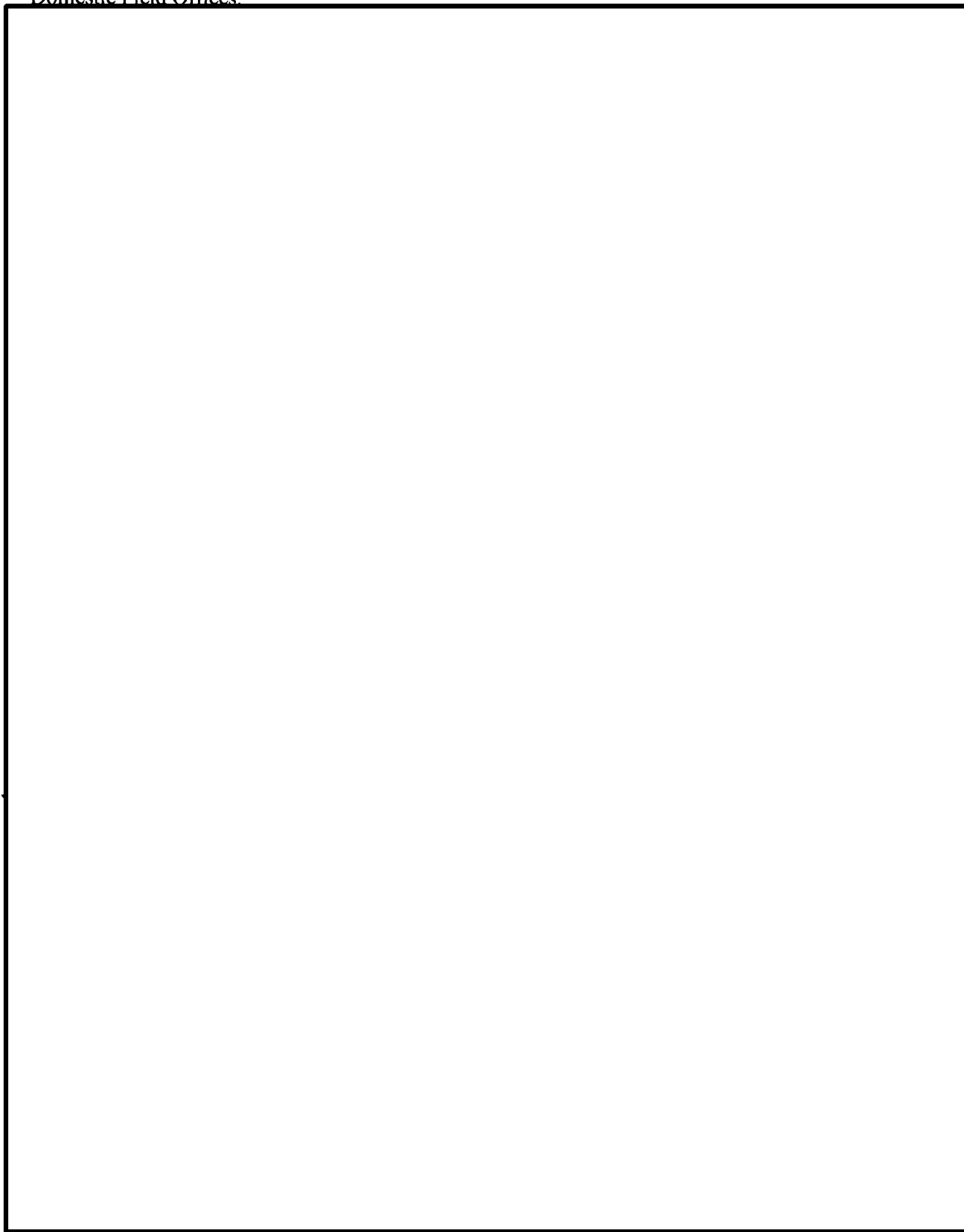
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**IV. Contact Information**

Questions regarding this memorandum may be directed through official channels to HQ, Office of Field Operations.

Distribution List:

- Regional Directors
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- Field Office Directors
- National Benefits Center Director