# U.S. CITIZENSHIP AND IMMIGR

**Fraud Detection and National Security Directorate**

**Screening Coordination Office (SCO) Program and Staffing Plan**
**March 22, 2012**

## Background

The FDNS Screening Coordination Office (SCO) was created in September 2011, incorporating most of the duties of the FDNS National Security Division's Policy and Program Development Unit. FDNS SCO establishes new background check policies and protocols, liaises with our partners in the law enforcement and intelligence communities to enhance USCIS background check processes, and coordinates screening and background checks among the various USCIS operational directorates.

## SCO Mission

The FDNS SCO assists FDNS leadership in remaining at the forefront of fraud detection and national security programs by formulating and implementing plans and programs based on sound research that is consistent with all relevant DHS, USCIS, and FDNS goals, legal authorities, and policies. FDNS SCO works with both internal and external partners to ensure that our background and security checks are consistent across USCIS and DHS and represent the highest levels of efficiency and effectiveness for the national security programs.

## Current FDNS SCO Staffing

Currently there are ten (10) full time employees and one (1) Unit Chief within the FDNS SCO. Of the eleven (11) full time employees, three (3) employees are on detail. One (1) is located at the National Counterterrorism Center (NCTC), one (1) is at the White House Situation Room and one (1) is with FDNS Refugee, Asylum, and International Operations Division (RAIO). The employees located at other government agencies (OGAs) have special assignments and tasks that are performed in accordance with MOUs/MOAs signed between USCIS and the OGA.

## Current Staffing Model



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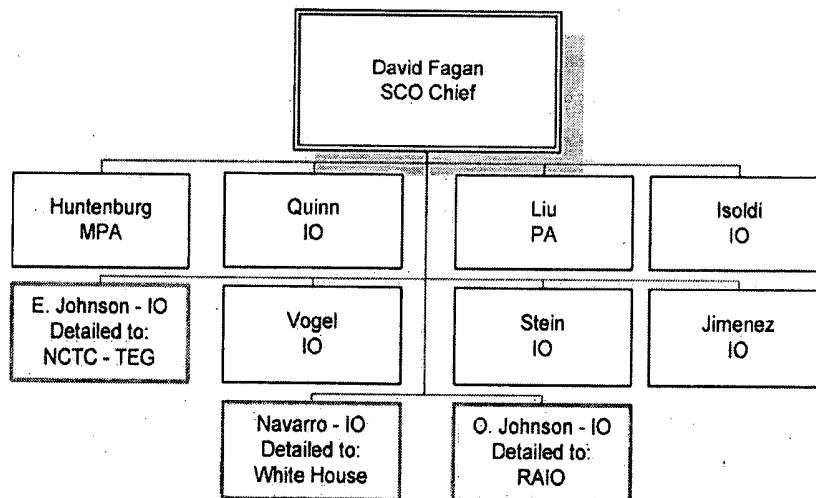
## Current FDNS SCO Duties

Currently, FDNS SCO duties include but are not limited to: developing, reviewing, and maintaining national security-related policies, programs, and projects needed to identify national security concerns related to USCIS applicants, petitioners, and beneficiaries, and obtain derogatory information needed for USCIS adjudicators to appropriately adjudicate benefit requests. FDNS SCO staff also work in partnership with Field Operations Directorate (FOD), Service Center Operations (SCOPS), Refugee, Asylum, and International Operations (RAIO), and other USCIS components to standardize and develop enhanced screening protocols, operating procedures, and policies across USCIS and DHS, as well as with DHS Intelligence and Analysis (I&A), DHS Screening Coordination Office (DHS SCO), DHS National Targeting Center (NTC) and NCTC.

FDNS SCO maintains similar cooperative relationships with other government agencies including the Department of State (DOS), the Department of Defense (DOD), United States Visitor and Immigrant Status Indicator Technology (US-VISIT), Federal Bureau of Investigation (FBI), National Security Agency (NSA), Central Intelligence Agency (CIA), Department of Treasury Financial Crimes, and other external components, to identify new screening opportunities and to refine existing screening protocols, all serving to enhance and increase FDNS SCO's capabilities.

USCIS is represented by FNDS SCO in inter-agency meetings related to screening, including the SAO Requirements Review Board, Common Vetting Working Group, I2 Biometric Enabled Stakeholders Working Group, IDENT Customers Working Group and various National Security Staffs' Interagency Policy Committees. On many occasions, FDNS SCO-members also acts as subject matter experts and FDNS representatives on internal DHS working groups in order to further USCIS' goals and needs, and to ensure the integrity and security of the nation's legal immigration system. Toward that end, FDNS SCO monitors legislative, regulatory and procedural developments, to ensure that they also support the FDNS mission.

An additional FDNS SCO duty is to serve as the clearinghouse for all draft documents to be reviewed (and edited) through the FDNS National Security Division, ensuring that those documents adhere to current FDNS screening efforts and policy.

## Recent Projects

- S-1 Initiatives
- Recurrent Vetting Service
- National Background, Identity, and Security Check Operating Procedures (NaBISCOP) Advisory Panel
- IC Screening of Refugee Applicants
- DOD NGIC-DHS Transition Plan for Biometric Intelligence
- NCTC Terrorist Identities Group Expansion of Watchlisting Services
- US-VISIT e-mail Notifications of IDENT Watch List Promotions
- US-VISIT/USCIS system-to-system notifications of IDENT Watch List promotions
- Automated Targeting System (ATS) recurrent vetting of refugee data
- Enhanced Screening for Law Enforcement Support Operations (LESO) Cases
- Creating FDNS Policy as needed

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- Working with the NCTC to develop a simpler mechanism for reporting encounters and TIDE enhancements for B10 records to the TSC, using pre-populated "Standard Nomination" forms.
- Develop plan to replace TECS batch checks through leveraging ATS-P full service screening, including identity resolution protocols and recurrent vetting capabilities.
- Develop plans for USCIS to originate nominations under HSPD-6 for individuals seeking immigration benefits who have a previously-unreported nexus to international terrorism.

## Proposed Expansion

In order for FDNS SCO to expand and develop new programs consistent with DHS' and USCIS' joint missions of counterterrorism and public safety screening, FDNS SCO must expand current staffing levels, become a stand-alone FDNS Division, and leverage other USCIS Directorates' assets. This will allow staff to accomplish DHS and USCIS missions more efficiently, focus on their respective projects, and avoid stretching FDNS SCO resources too thin. While FDNS SCO could continue to operate in the new structure while inside the National Security Division, elevating FDNS SCO to a Division will allow FDNS SCO to be more agile, work across all FDNS Divisions, and respond quicker to new FDNS and USCIS management requirements. An expansion and separation of the duties from FDNS National Security Division into the FDNS Screening Coordination Division will allow for FDNS SCO officers to narrow the focus of their work and continue to produce high caliber work product to support the overarching USCIS mission.

FDNS SCO has an extremely large array of related assignments and roles. Currently, FDNS SCO has 18 on-going long term projects (listed on page 4 of this document). FDNS SCO is developing new screening tools and IT programs for USCIS. Under current staffing FDNS SCO officers are simultaneously policy writers, operational subject matter experts, research analysts, hands-on case workers, and systems analysts. FDNS SCO believes that in order to perform tasks more efficiently and effectively, there needs to be a distinction between those officers who are operational, and those who analyze and draft policy.

With these proposed changes in mind, FDNS SCO envisions becoming two (2) sections to enhance the USCIS and FDNS screening mission:

- Policy and Programing Section
- Operation and Support Section

This will allow each section – and FDNS SCO as a whole – to focus on their respective objectives related to screening and coordination.

### Policy and Programming Section:

Under the new FDNS SCO, the Policy and Programming Section will be in charge of developing programs and drafting associated policy guidance in coordination with other USCIS and DHS components. This will also include coordination with Transformation on security check

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processes and being the primary liaison to other USCIS entities. FDNS SCO Policy and Programming Section will be the FDNS lead for the Risk and Fraud Analyzer and any expansions for that service.

The new FDNS SCO Policy and Programming Section tasks will include: attending working groups such as the DHS Common Vetting Working Group, USCIS Working Groups and FDNS Working Groups. Tasks will also include coordinating and implementing new security check initiatives within USCIS and with other government agencies. The FDNS SCO Policy and Programming Section will also be in charge of the NaBISCOP Advisory Panel and any security check expansion project or study.


## *Operation and Support Section:*

Under the new FDNS SCO, the Operation and Support Section will be in charge of conducting screening activities, such as running checks, creating reports, and coordinating checks with other USCIS and DHS components. The FDNS SCO Operation and Support Section will need access to the USCIS Command Center's Sensitive Compartmented Information Facility (SCIF) for the processing of classified security checks and queries. This will require one of the following::
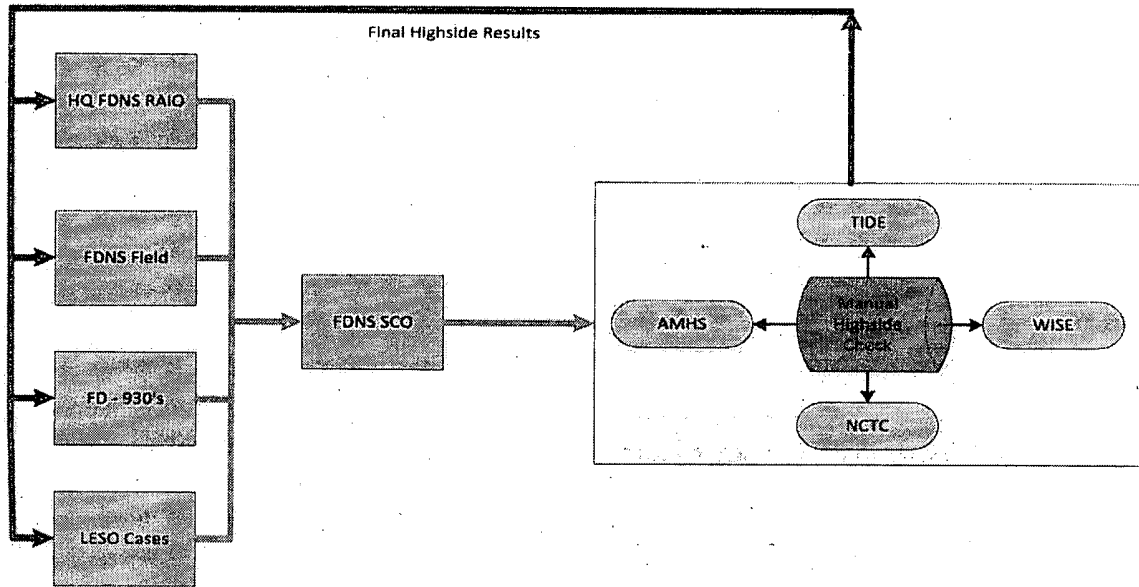
1) Expansion of USCIS SCIF to hold new personnel
2) Using a SCIF location at an offsite location with a partner agency (DHS NAC, TSC, DHS I&A, NTC)
3) Integration of FDNS SCO Operations Unit into overarching DHS facility for "centralized and coordinated screening" (DHS Centralized Screening Taskforce to provide information and recommendations to the field.)

FDNS SCO Operation and Support Section will be responsible for all queries of classified systems (highside checks).[1] FDNS SCO Operation and Support Section will assist the field and other agencies with information from classified sources or systems in order to facilitate better adjudicative actions. FDNS SCO Operation and Support Section will also coordinate the NCTC Enhanced Screening.[2] The operational process flow is shown in the following diagrams for the NCTC Enhanced Screening Checks and the USCIS Highside Checks.
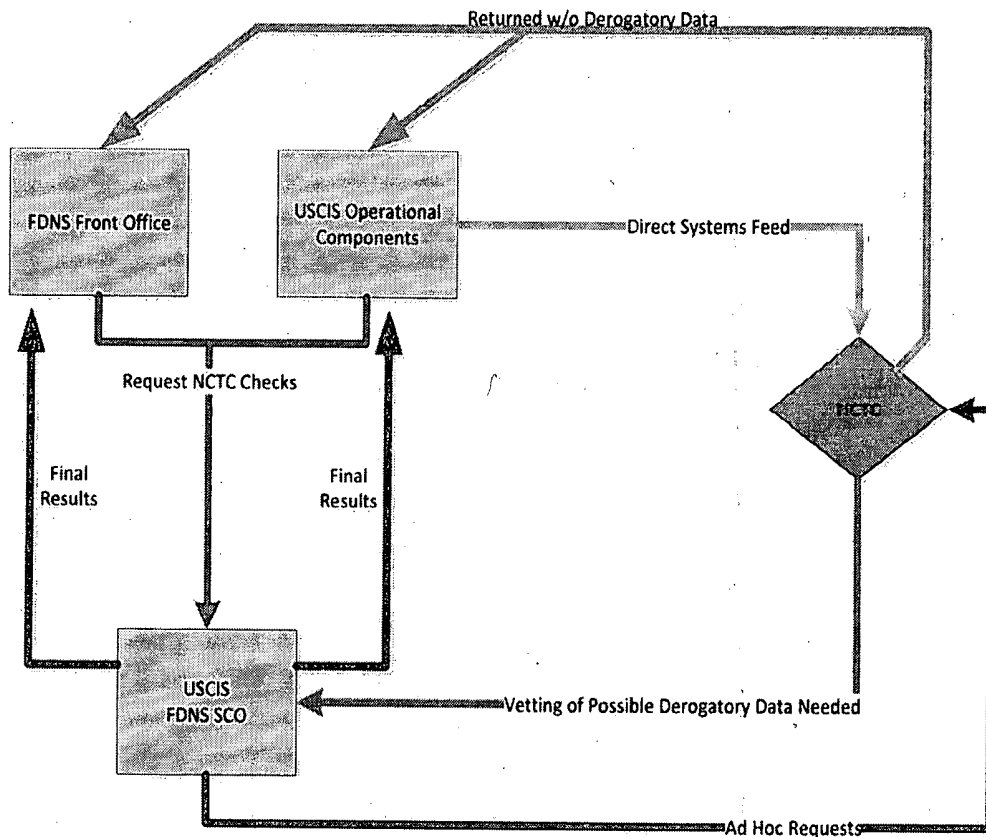
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[1] The term "highside check" is used to describe manual national security checks are performed in a SCIF by FNDS IOs that go beyond those traditionally utilized by USCIS to screen individuals seeking immigration benefits.
[2] NCTC Enhanced Screening involves semi-automated checks performed on behalf of USCIS by the NCTC Screening Support Program. The NCTC Screening Support Program provides USCIS heightened capabilities for completing national security screening of those individuals seeking immigration benefits in an accurate and timely manner.
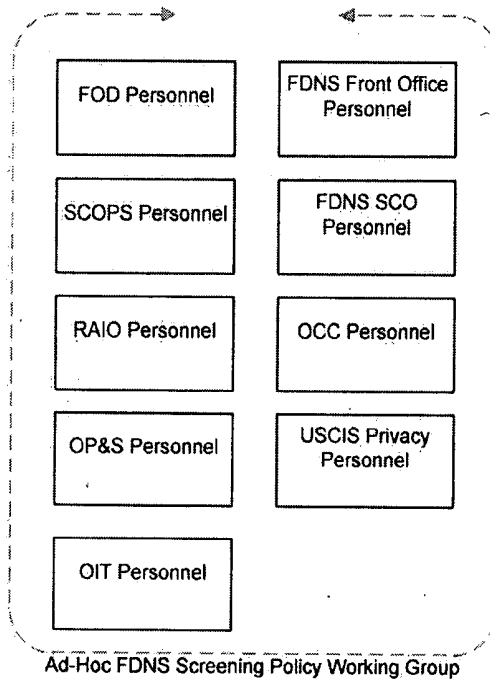
# HQ FDNS "Highside Checks" Workflow

Final Highside Results

HQ FDNS RAIO

FDNS Field

FD - 930's

LESO Cases

FDNS SCO

TIDE

AMHS

Manual Highside Check

WISE

NCTC

# NCTC Enhanced Screening Workflow

Returned w/o Derogatory Data

FDNS Front Office

USCIS Operational Components

Direct Systems Feed

Request NCTC Checks

NCTC

Final Results

Final Results

USCIS FDNS SCO

Vetting of Possible Derogatory Data Needed

Ad Hoc Requests

## Future Plans and Detailees

The FDNS SCO also envisions creating a working group modeled after the highly successful NaBISCOP Advisory Panel for clearing all policy and program initiatives before asking concurrence through Executive Secretariat. The Policy and Programming Section will serve as the group lead although the working group will be made up with designated members from all of FDNS operational components (FOD, SCOPS and RAIO) along with OP&S USCIS Office of Privacy, OIT and OCC. The working group will allow greater coordination between all directorates that will enhance the effectiveness and efficiency of all program guidance related to USCIS screening efforts and the program development. Bringing these assets and skillsets to bear on policy and program development for standardization of national security and public safety screening across components will enable FDNS SCO to foster a more focused set of objectives related to security screening and the coordination required to achieve superior performance of the USCIS screening mission.

# Proposed National Security Screening Coordination Workgroup

| FOD Personnel | FDNS Front Office Personnel |
|---|---|
| SCOPS Personnel | FDNS SCO Personnel |
| RAIO Personnel | OCC Personnel |
| OP&S Personnel | USCIS Privacy Personnel |
| OIT Personnel | |

Ad-Hoc FDNS Screening Policy Working Group

## Proposed Staffing Updates and Organizational Chart:

It is anticipated that this staffing model will leverage detailees from other USCIS Directorates and offices, which will allow for direct participation and ownership of all new policy and program initiatives as well as prioritization of operational component's classified screening.

FDNS SCO recommends that the following components provide highly skilled detailees to be embedded fulltime in the FDNS SCO Policy and Programming Section: Refugee, Asylum and International Operations (RAIO), Field Operations Directorate (FOD), Service Center
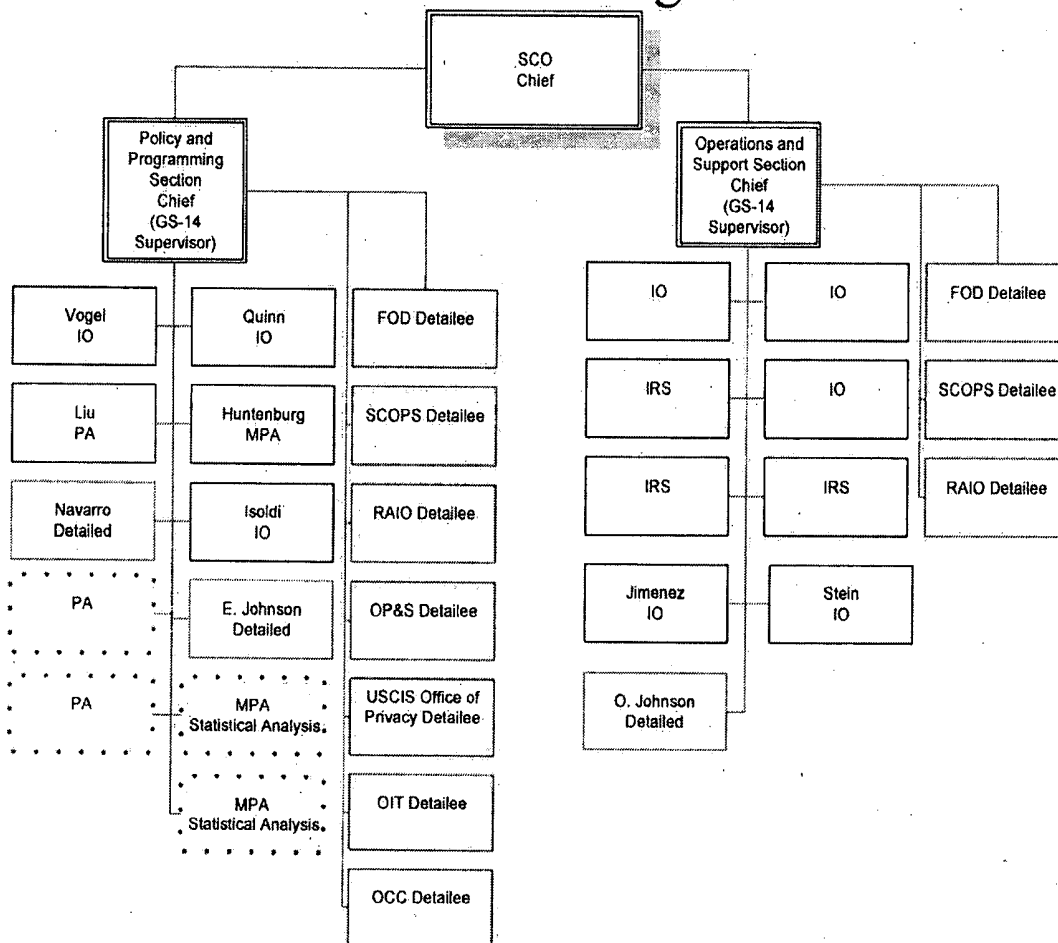
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Operations (SCOPS), Office of Privacy, Office of Policy and Strategy (OP&S), Office of Information and Technology (OIT) and Office of Chief Council (OCC).[3]

FDNS SCO also seeks to add four (4) employees/positions:

- 2 - Policy Analyst
- 2 - Management and Program Analyst

The proposed organization is laid out in the following chart[4]:

# New FDNS SCO Organization



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[3] The Individual Position Numbers (IPNs) for these Fulltime Employee (FTE) detailees will be provided by FDNS. The requirement for fulltime embedded personnel from other directorates and offices in not only based on anticipated workload, but a need for component expertise and enhanced coordination. If workload is such that it is determined that fulltime detailees are not required, FDNS NSD retains the prerogative to reduce the time detailees spend embedded.

[4] The organizational chart proposes GS-14 Section Chiefs in anticipating of no organizational change within FDNS NSD. If however, SCO is elevated organizationally GS-15 Section Chiefs may be more appropriate.

# Conclusion

FDNS SCO seeks to divide into two operational components, the Policy and Programming Section and the Operation and Support Section. FDNS also seeks to be elevated to a Division, co-equal with the Fraud, National Security, and Intelligence Divisions within FDNS. If these changes are approved, FDNS SCO will begin hiring the additional personnel to implement the staffing plan outlined in this document, and begin seeking detailees from the components.

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HQFDNS Management Decision:     _X_ Approved          _____ Denied

Steven Bucher, Associate Director FDNS                    Date

Comments:

- Develop Implementation Plan.
- Stand up SCO Program within the National Security Division with GS-14 Supervisors.
- Assess after execution whether the program should remain in NSD or be spun-off.

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