



**Homeland
Security**

RECOMMENDATION FROM THE CIS OMBUDSMAN TO THE DIRECTOR, USCIS

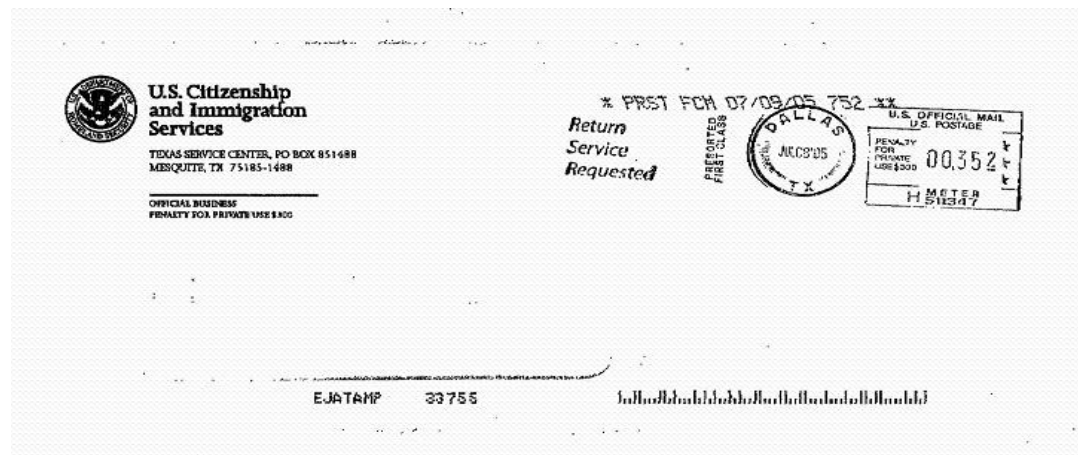
To: Robert Divine, Acting Deputy Director, USCIS
Cc: Michael Jackson, Deputy Secretary
From: Prakash Khatri, CIS Ombudsman
Date: July 29, 2005
Re: Recommendation to USCIS to eliminate the postal meter mark 'Return Service Requested' on USCIS envelopes, thereby allowing all USCIS correspondence to be forwarded to applicants/petitioners

I. RECOMMENDATION

Recommendation to USCIS to eliminate the postal meter mark 'Return Service Requested' on USCIS envelopes, thereby allowing all USCIS correspondence to be forwarded to applicants/petitioners.

II. BACKGROUND

According to the U.S. Postal Service's Domestic Mail Manual, section 507 Mailer Services, subsection 3.4.1(c), the following types of mail are not forwarded – "mail showing specific instructions of the sender (e.g. Return Service Requested or Change of Service Requested)." Some USCIS mail (e.g. Texas Service Center) displays the postal meter mark 'Return Service Requested,' thereby requiring correspondence to be returned if undeliverable at the address posted for the recipient.



The Ombudsman has been unable to determine the rationale for implementing a non-forwarding mail policy in the past and the justification as to why USCIS employs such procedure at selective local offices. There appears to be no statutory and/or policy regulations mandating such practices.

Failure to forward USCIS correspondence adversely impacts applicants/petitioners and USCIS as it causes unnecessary and excessive delays, and burdens the system and processes. Applicants/petitioners miss appointments, interviews, and hearing dates; fail to receive approval and receipt notices; and may not obtain returned incomplete applications or blank immigration forms. USCIS is encumbered with unnecessary inquiries, pervasive rescheduling issues/problems, and burgeoning piles of un-filed papers. This leads to inefficient use of existing labor and negatively impacts backlog reduction efforts as resources could be more appropriately assigned for increased and optimal productivity and efficacy.

The cost of resending and receiving correspondence, processing returned mail, and handling inquiries regarding non-delivery of notices, cards, and documents is obvious and substantial. The expense to employers and individuals in terms of cost, time, and effort is both unwarranted and considerable. Employers lose valuable opportunities to hire skilled labor, and individuals are delayed in becoming assimilated and productive residents and/or citizens.

In addition, the 'Return Service Requested' postal meter mark is not uniformly employed by all USCIS offices. For example, metered mail from the National Benefits Center and the Newark Asylum Office fail to indicate such mark. This lack of standardization regarding returned USCIS mail places an unequal burden on labor and creates a correspondence backlog in some USCIS offices and not others, as well as causes inequitable treatment of some immigration customers.

III. JUSTIFICATION

Forwarding all USCIS mail and eliminating the 'Return Service Requested' postal meter mark on all USCIS envelopes is mutually beneficial to USCIS and the applicant/petitioner.

The benefits to USCIS include:

- 1) Relieving offices from the burden of filing and/or compiling a backlog of old correspondence;
- 2) Eliminating labor to address this filing issue and reallocating resources to handle other responsibilities;
- 3) Reducing the number of status inquiries to USCIS offices as applicants/petitioners receive the appropriate mail/notices regarding their cases;
- 4) Diminishing the number of rescheduled interviews, appointments, and hearing dates as notices to appear arrive in a timely manner informing and allowing applicants/petitioners to timely attend;
- 5) Improving customer service as applicants/petitioners receive necessary and pertinent information; and

- 6) Streamlining and reducing the quantity of mail intake; permitting USCIS to focus on filing necessary correspondence in a timely manner and decreasing potential improper filing or non-filing that result from bulk.

As USCIS rarely updates computer systems from returned mail, returned correspondence serves no functional purpose to the case/file and USCIS. USCIS notices generally are reissued using the established address on record, whereby perpetuating a cycle of wasted time, paper, and mailing costs. There is also minimal or no expense to USCIS associated with this recommendation as the 'Return Service Requested' mark can easily be obscured on existing envelopes, and new metered plates without the language can be purchased for a nominal cost. Yet, the overall savings to USCIS in terms of postage costs, labor, and time is significant.

Moreover, USCIS postal meter marks should be uniform throughout the country. Variant postal meter marks promote inequitable treatment and confusion among immigration customers as some receive mail and others do not. As federal law governs immigration benefits, all customers should be handled similarly regardless of their location in the U.S. or type of application/petition pursued; otherwise, it is counterproductive to customer service, quality, and efficiency. In addition, this lack of standardization saddles some USCIS offices with unnecessary work, while others have more available resources to handle backlogs and additional responsibilities.

The benefits to the applicant/petitioner include:

- 1) Receiving timely notices of appointments, interviews, and hearing dates leads to timely adjudications and obtaining desired immigration benefits; and
- 2) Reducing the frequency and/or necessity to contact with USCIS, whereby resulting in better-informed satisfied customers.

IV. BENEFITS

Customer Service:

Forwarding USCIS mail will improve customer service as applicants/petitioners are more appropriately and timely informed, thereby reducing frustration, complaints, and contact (i.e. multiple visits, telephone inquiries) with USCIS. Customer service would further be enhanced by uniform postal meter requirements as individuals would not be confused about local procedures and failure of delivery for what should be a national standard. This will also decrease processing delays, which often means lost employment, financial hardships, and unnecessary family separation for many immigration customers.

USCIS Efficiency:

With the reduction of status inquiries made by customers and the increased quantity of mail delivered to customers, labor availability within USCIS will increase, thus allowing USCIS to achieve greater operational efficiency by reallocating personnel and other resources. In addition, improved timeliness, attendance, and information regarding appointments and interviews promotes effective operations as well as a more responsive system to immigration customers – the more interviews conducted and not rescheduled, the more the backlog is reduced.

National Security:

This recommendation enhances national security and public safety. Individuals are normally permitted to remain in the U.S. while their benefits applications are pending. Timely delivery of USCIS correspondence (i.e. fingerprint appointments, interview notices, denials, etc.) via forwarded mail results in a quicker processing system, whereby initiating earlier enforcement activities should applicants fail to comply with administrative responsibilities necessary to complete the immigration process.