



NATIONAL IMMIGRATION LAW CENTER

1101 14th Street, NW, Suite 410
Washington, D.C. 20005
(202) 216-0261 fax (202) 216-0266

INS DATA: THE TRACK RECORD

For years, the General Accounting Office and the Justice Department's own Inspector General condemned the Immigration and Naturalization Service for the quality of its records. This is particularly significant in the post September 11 environment. The Attorney General and other federal officials have announced that many immigration records will be included in the National Crime Information Center database (the nation's principal crime information database, used by police officers to find out if the person they've just stopped, or arrested, is on any wanted lists of ordinary criminals or terrorists). Moreover, with increased data sharing, immigration records will be available to and relied upon by other government agencies. With non-citizens' access to due process eroded since 9/11, INS data errors can lead to detention and even deportation.

The following is a compilation of GAO and OIG reports (along with one newspaper article) illustrating INS data problems. The reports range in subject matter from mismanagement or misconduct within the INS, to the inadequacy of INS data and records systems, to the unreliability and inaccuracy of INS data. Congress abolished the INS and moved its operation into the Department of Homeland Security, but its records and record management techniques will haunt noncitizens for a long time to come.

ADEQUACY OF INS SYSTEMS

United States General Accounting Office, Information Technology. *Homeland Security Needs to Improve Entry Exit System Expenditure Planning*. GAO-03-563, June 2003.

“However, INS has yet to develop a security plan and privacy impact assessment for the entry exit system, both of which are important to understanding system requirements and ensuring the proper safeguards are in place to protect system data resources. According to INS officials, the agency has not developed a security plan and privacy impact assessment because it is too early in the system development life cycle to do so. This is not consistent with system acquisition best practices and federal guidance, which advocate understanding and defining security and privacy requirements both early and continuously in a system's life cycle. Until these important requirements are satisfied, the basis for further entry exit system definition and acquisition will be limited, thereby introducing the risk that security and privacy will not be effectively and efficiently addressed.”

United States General Accounting Office, Homeland Security: *Challenges to Implementing the Immigration Interior Enforcement Strategy*. GAO-03-66-0T, April 10, 2003

“Need for Better Information Technology: INS had long-standing difficulty developing and fielding information systems to support its program operations, and effectively using information technology continued to remain a challenge.

United States General Accounting Office, Report to Congressional Requesters. *Justice Plans to Improve Oversight of Agency Projects*. GAO-03-135, Nov. 22, 2002.

“Justice has not effectively overseen INS’s investment in IT systems, but improvements are planned. One indicator of oversight effectiveness is the quality of the oversight process followed, particularly whether the process provides for measuring progress against such commitments as what system capabilities and benefits will be delivered, by when, and at what cost. Justice does not yet have such an oversight process in place. Moreover, our analysis of four key INS projects showed that Justice oversight activities have not addressed such progress so that timely corrective action could be taken to address deviations from commitments. According to Justice officials, the department is not conducting such oversight because it has not given enough priority to the task, and because INS does not have the project data that would enable Justice to conduct effective oversight. As a result, Justice has allowed INS—an agency that we and the Justice Inspector General (IG) have reported to be challenged in managing IT—to largely go unchecked in its attempts to leverage IT to improve mission performance.”

Glenn A. Fine, Inspector General, Memorandum for the Deputy Attorney General, *Top Management Challenges in the Immigration and Naturalization Service: 2002*, Nov. 8, 2002.

Computer Systems Security....“Our review of the management, operational, and technical controls that protect the INS's core network found medium to high vulnerabilities for unauthorized use, loss, or modification in 9 of the 17 control areas that were tested, with 2 reported as high vulnerabilities. We noted a need for improvements or corrective actions with respect to the security evaluation and risk assessment; interconnections with other networks; intrusion detection systems; tape management; and access, password, and encryption practices. Our review of the INS records management system found deficiencies in 12 of the 17 control areas tested. We found inadequate security evaluation and risk assessment practices, and recommended that these deficiencies may warrant rescinding the system's certification and accreditation in favor of an interim approval to operate until corrective action is completed. We also recommended corrective action regarding system contingency planning and clarification of the responses required in the event of a service.”

RELIABILITY AND ACCURACY OF INS DATA

United States Department of Justice, Office of the Inspector General, Evaluation and Inspections Division. *The Immigration and Naturalization Service's Removal of Aliens Issued Final Orders*, Report Number I-2003-004, February 2003

“Our 1996 report also cited the lack of accurate address information for aliens as an obstacle to their removal. Our interviews and recent reports prepared by GAO and the INS Office of Internal Audit confirm that the INS continues to face significant data accuracy problems. During this review, we compared data from the INS’s and EOIR’s alien case tracking and management systems and found name, nationality, and case file number discrepancies, as well as cases missing from the electronic files. The discrepancies occurred in 7 percent of the 308 case files of aliens with final orders, and 11 percent of the sample of 470 aliens from state sponsors of terrorism. According to the INS, data discrepancies are caused by data entry errors, incompatibilities between the systems, and the lack of a system for correcting data inconsistencies.”

John M. Broder, *I.N.S. Shredder Ended Work Backlog, U.S. Says*, The New York Times, January 31, 2003.

LOS ANGELES, Jan. 30 — “Tens of thousands of pieces of mail come into the huge Immigration and Naturalization Service data processing center in Laguna Niguel, Calif., every day, and as at so many government agencies, it tends to pile up. One manager there had a system to get rid of the vexing backlog, federal officials say. This week the manager was charged with illegally shredding as many as 90,000 documents.... Among the destroyed papers, federal officials charged, were American and foreign passports, applications for asylum, birth certificates and other documents supporting applications for citizenship, visas and work permits.”

Glenn A. Fine, Inspector General, Memorandum for James W. Ziglar, Commissioner, Immigration and Naturalization Service, *Follow-Up Report On INS Efforts To Improve The Control Of Nonimmigrant Overstays*, Report No. I-2002-006, April 2002

“To compound the difficulty in identifying overstays, the Statistics Office no longer receives updates on visa extensions or adjustments of status. Therefore, some aliens appear to be overstays when they are legally in the United States. The Statistics Office official acknowledged that current Form I-94 data is not reliable for: Estimating the overall overstay rate. Assisting in determining a country's continuation in the Visa Waiver Program. Determining with certainty whether an alien who appears to be an overstay is actually an overstay....In this follow-up review, we concluded that the INS has made little progress in addressing the important issue of nonimmigrant overstays since we issued our 1997 report. The terrorist attacks of September 11, 2001, focused renewed attention on the importance of knowing when nonimmigrant visitors enter and depart the United States. It is critical for the INS to be able to identify individual overstays, collect aggregate information on overstays, and develop an effective interior enforcement strategy for pursuing overstays who are identified as representing the greatest potential risk to the security of the United States.”

United States General Accounting Office, Report to Congressional Requesters, *Homeland Security: INS Cannot Locate Many Aliens Because It Lacks Reliable Address Information*, GAO-03-188, Nov. 21, 2002

“Recent events have shown that INS's alien address information could not be fully relied on to locate many aliens who were of interest to the United States. The reliability of INS's alien address information is contingent, in part, on aliens' compliance with the requirement that they notify INS of any change of address. However, lack of publicity about the requirement that aliens should file change of address notifications, no enforcement of penalties for noncompliance, and inadequate processing procedures for changes of address also contribute to INS's alien address information being unreliable....When aliens do comply with the requirement, INS lacks adequate processing procedures and controls to ensure that the alien address information it receives is recorded in all automated databases.”

United States Department of Justice, Office of the Inspector General, *Immigration and Naturalization Service's Ability to Provide Timely and Accurate Alien Information to the Social Security Administration*, Report Number I-2003-001, November 2002

“INS Management of Immigrant Visa DataShare: Although the INS has been in implementing the enumeration phase of DataShare, we found that the INS has not assigned specific tasks and responsibilities for managing DataShare to the appropriate offices. It also has not addressed other key elements in implementing the DataShare program....The INS has not formally documented the responsibilities and

tasks of each INS entity for implementing and managing DataShare. As a result, none of the entities has taken the responsibility to develop and implement policies, procedures, performance measures, and management controls. Inspections, as the primary user of DataShare, has the responsibility to ensure that its inspectors have the expertise and guidance to appropriately implement DataShare. We also found that the INS also has not developed performance measures or management controls for DataShare. Even if the INS had policies and procedures in place, the INS managers would have difficulty monitoring the program, identifying problems, and taking corrective actions if performance measures and management controls are not in place. The INS managers must know if the program is functioning as intended.”

Glenn A. Fine, Inspector General, Memorandum for the Deputy Attorney General, *Top Management Challenges in the Immigration and Naturalization Service: 2002*, Nov. 8, 2002.

“Our review of the INS records management system found deficiencies in 12 of the 17 control areas tested. We found inadequate security evaluation and risk assessment practices, and recommended that these deficiencies may warrant rescinding the system's certification and accreditation in favor of an interim approval to operate until corrective action is completed. We also recommended corrective action regarding system contingency planning and clarification of the responses required in the event of a service disruption. In all, the OIG made 18 recommendations to the INS for corrective actions regarding the 2 systems.”

United States General Accounting Office, Report to Congressional Requesters. *Immigrant Benefits: Several Factors Impede Timeliness of Application Processing*. GAO-01-488, May 4, 2001

“INS does not know how long it takes to process aliens’ applications because its available service-wide automated systems contain unreliable data and its districts do not have automated systems for tracking many types of applications.”

James W. Ziglar, Commissioner Immigration and Naturalization Service, Memorandum for Mary W. Demory Assistant Inspector General for Evaluations and Inspections Department of Justice, *Juvenile Repatriation Practices at Border Patrol Sectors on the Southwest Border*, Report Number I-2001-010, September 2001

“The El Centro Border Patrol Sector does not always complete repatriation records. The 1987 and 1997 policy memoranda specify record keeping requirements. These requirements include recording: Name of the Border Patrol agent or detention enforcement officer that escorts the juvenile to the Mexican Consulate for interview/ repatriation and the date of the escort on the manifest and, Name of the Mexican official taking custody of the juvenile and the date of the transfer on the manifest. We found that information frequently was not recorded on the manifest. For example, we reviewed 66 manifests at the Calexico Border Patrol Station and found the following omissions: 44 omitted the name of the INS escorting officer and the date the transfer of custody occurred; 25 omitted the signature of a Mexican official and the date of the transfer of custody; 52 omitted the time of the transfer of custody. (Some manifests contained multiple omissions.)”

United States Department of Justice, Office of the Inspector General, *Follow-up Report on the Visa Waiver Program*, Report No. I-2002-002, December 2001

“These interviews show that, while INS has issued policies that centralize the unit responsible for collection of missing passport information and the entering of that information into the lookout system, these policies are not being followed. The intent of our original recommendation was for the INS to

designate a centralized unit within INS to collect information on missing visa waiver passports to ensure that this information was entered quickly and accurately into the lookout system. The INS subsequently issued a policy but our follow-up review shows that the policy is being disregarded and that reporting of this information by INS personnel in the field to the Lookout Unit is still not systematic. INS personnel in the field directly enter their own missing passport lookouts into the lookout system, without also forwarding the data to the Lookout Unit. We recommend that INS determine whether the Lookout Unit, INS field personnel, or a different mechanism is the most appropriate solution to ensure that information on missing passports are entered into the lookout system in a systematic, timely, and accurate manner.”

U.S. Department of Justice, Office of the Inspector General, *Identifying Current Challenges to INS's Plans for Using Risk Management in the Seaport Environment*, I-2000-015, March 2000.

“EXECUTIVE SUMMARY-- Regardless of whether risk management is viable within the seaport environment, we do not believe that INS’s current capabilities for collecting, analyzing, and sharing inspection data are sufficient for supporting an effective risk management strategy. Current methods used by INS for recording and maintaining inspection data make it difficult to conduct the type of analysis required by an effective risk management strategy not only at seaports that use manual methods, but also at seaports using automated databases. In addition, we found that not all inspection data is complete or accurate, limiting the extent to which INS may be able to draw reliable conclusions about immigration risks within the seaport environment. Finally, current methods used by INS do not allow seaports to share or exchange inspection data easily. This limits INS’s ability to identify any regional or national trends regarding immigration risks and to subsequently develop an appropriate inspection strategy for addressing these risks.”

Immigration and Naturalization Service: Information on the Disposition of Naturalization Cases and on Courtesy as a Factor in Employee Performance Appraisals. GAO-00-132R, May 23, 2000

“Recurrent problems with transferring naturalization case data from one automated system used by the service centers to another used by district offices caused cases to be inadvertently dropped at the Nebraska Service Center, as well as the other three INS service centers, according to an INS Nebraska Service Center official.... An official from the Nebraska Service Center estimated that about 4,000 naturalization cases were inadvertently dropped during the data transfer for the Chicago district during fiscal years 1997 and 1998. An official from the California Service Center also told us that this problem occurred at all four service centers. He estimated that over 44,000 naturalization cases were inadvertently dropped at the California Service Center during the data transfer for the Los Angeles district during fiscal years 1997 and 1998....Although the particular problem that caused naturalization cases to be inadvertently dropped during data transfers in fiscal years 1997 and 1998 no longer exists, according to INS Nebraska and California Service Center officials, new instances of dropped cases during data transfers have occurred with INS’ deployment of a new naturalization automated case tracking system.”

United States Department of Justice, Office of the Inspector General. *Follow-up Inspection of the Immigration and Naturalization Service Document Fraud Records Corrections*, Report Number I-2000-021, Sept. 28, 2000.

“INS has failed to remove NAILS records of individuals who have received additional INS benefits. Of the 333 records that have "NAILS-X" flags in CIS, 36 (10.8 percent) indicate the aliens have received benefits since the records were flagged. However, the NAILS records and corresponding flags in CIS were never

removed.... Likewise, if substantial evidence exists that an alien has committed an offense, then the information and instructions in the boilerplate are no longer applicable and the NAILS record and flag should be removed. According to INS policy, 'Flagging of Fraudulent Records in INS Automated Systems,' CIS must be checked for all applications and petitions before any INS benefit is granted or any INS action is taken. If a NAILS flag is found for the applicant or petitioner in CIS, there are procedures that must be followed at the field level. If adjudicators are not checking CIS, there is no mechanism to ensure an inquiry is conducted. If the original benefit for which the record was flagged was obtained illicitly, the alien is not only retaining the ill-gotten benefits but is also receiving additional benefits. Alternatively, when adjudicators query CIS during the benefit process and follow up on the NAILS flags, yet do not follow procedures to eliminate the NAILS record when allegations of wrongdoing cannot be substantiated, the aliens and INS may face additional obstacles."

United States General Accounting Office, Report to the Chairman, Subcommittee on Immigration and Claims, Committee on the Judiciary, House of Representatives. *Immigration Benefits: INS Not Making Timely Deposits of Application Fees.* GGD-00-185, September 29, 2000.

"Because the data maintained by INS were not complete, we were unable to fully determine the extent to which INS complied with Department of the Treasury regulations requiring that receipts totaling \$5,000 or more be deposited on the same day if they were received prior to the deposit cutoff time, or the next day if they were received too late to meet the cutoff time. INS maintained initial application acceptance processing data for its four service centers, which handled about 75 percent of the applications received. However, INS did not maintain such data for its 33 district offices, which handled the remaining 25 percent of applications received."

U.S. Department of Justice, Office of the Inspector General, Inspections Division, *Voluntary Departure: Ineffective Enforcement and Lack of Sufficient Controls Hamper the Process*, Report Number I-99-09, March 1999.

"INS fails to track voluntary departures granted by INS district officers. INS record-keeping for voluntary departures granted by INS district officers is seriously flawed.... We were unable to find documentation of departure for many of the aliens in our review of INS-granted voluntary departure cases. INS's failure to document these voluntary departures results in an incomplete immigration history for each of those illegal aliens. ... In addition, steps INS has taken recently to track voluntary departures granted by INS district officers have not been effective. ... We found that the system, the Interior Voluntary Return Tracking System (IVRTS) that INS implemented in fiscal year 1997, does not track individual aliens who are granted voluntary departure by INS district officers and can offer only an incomplete count of those grants nationwide.... The "tracking system" is flawed in more systemic ways as well. ... It provides no information suitable for follow-up enforcement and none useful for lookout indices. INS should either improve the accuracy and expand the capabilities of IVRTS or discontinue the system.... INS does a poor job of documenting the transportation of illegal aliens in its custody, making the tracking of individual aliens virtually impossible."

United States Department of Justice, Office of the Inspector General, Inspection Report. *The Potential for Fraud and INS's Efforts to Reduce the Risks of the Visa Waiver Pilot Program*, Report No. I-99-10, March 1999

"INS fails to enter stolen passport information into the lookout system in a timely or accurate manner. Even if INS checked all passport numbers against the lookout system, the effectiveness of the checks is reduced by problems we identified in INS's entry of stolen VWPP passport information. Mala fide VWPP

applicants have entered the United States without being intercepted because INS did not systematically collect information on all stolen passports and did not create lookout records based on the information that it did receive. There are also problems with the timeliness and accuracy of the lookout records that INS did create.”

U.S. Department of Justice, Office of the Inspector General, Inspections Division, *Review of the Immigration and Naturalization Service's Automated Biometric Identification System (IDENT)*, Report Number I-98-10, March 1998

“INS Has Not Taken the Necessary Steps to Ensure IDENT Data Integrity -- We found serious data management and integrity problems in IDENT that must be addressed promptly. We identified problems such as duplicate records and invalid data, and found that the system can generate multiple fingerprint identification numbers (FINs) for one individual. We found that data input controls, designed to ensure that only valid data is entered into the system, are almost completely lacking in both the recidivist and lookout databases.... Input controls that accept only valid entries in the IDENT lookout database are lacking for critical fields such as alien number, last name, date of apprehension, originating office and charge code....We also found over a thousand invalid data entries in the alien number field, including data that should have been entered elsewhere in the database such as dates, "N/A", 10-print card originating office code, country of origin, charge, and numerous unidentifiable alphanumeric entries. As a result, some of the data entered is invalid, and this will limit its usefulness in determining an alien's status and in performing analyses used for agent deployment and intelligence purposes. In addition, without a valid alien number, INS personnel are unable to cross-reference lookout hit information with other INS nationwide systems to obtain information on an alien's previous history with INS. It is important that INS put appropriate data input controls in place to ensure the quality of this data. We also discovered that the system is generating multiple FINs for a single individual. This is contrary to the central premise that each individual should have a unique fingerprint record.”

Department of Justice, Office of the Inspector General, Inspections Division, *Controls Over Certificates of Naturalization (Phase II)*, Report Number I-98-14, April 1998.

“Data Base Errors --The CIS is the primary data base for inquiring about an alien's status.... Because of the volume of work and the time necessary to close a case, naturalization data may not get into the CIS for months following the granting of naturalization. In addition, clerical input errors may result in alien-identifying data in RNACS (e.g., name and A-number) not matching corresponding data in CIS. As a result, CIS will not accept the update from RNACS. When this happens, an error listing will be generated from INS Headquarters and transmitted to field locations. However, the error listing will not only contain the mismatch errors from RNACS, but also contain all the mismatches from all attempts to match CIS from the various INS databases. At the offices we visited, computer managers did not try to separate the mismatches by the various program offices and, therefore, naturalization program managers stated that they did not receive such error listings to review and correct. It is important that the CIS be current and accurate. Should a benefits provider or employer contact INS to verify a person's status, inaccurate information could result in the denial of benefits or employment.”

U.S. Department of Justice, Office of the Inspector General Inspections Division, *The Immigration and Naturalization Service's Customer Management Information System*, Report Number I-98-19, July 1998

“CMIS Data is Not Consistently Reliable Because of Faulty Data Entry.... Although CMIS reports could be valuable tools for assessing and improving customer service, the data contained in CMIS, and reflected

in the reports, is unreliable. We observed numerous instances of IIOs incorrectly entering or failing to enter data. These data entry errors and omissions caused the system to report erroneously the total number of customers served, the number of customers served by category, the number of transactions performed, and customers' wait and transaction times. We confirmed, when possible, our field observations with an analysis of CMIS reports from field sites. We also surveyed IIOs and found that many could not identify the correct CMIS category and transaction codes for specific services.”

GAO, *Immigration Statistics: Information Gaps, Quality Issues Limit Utility of Federal Data to Policymakers*. GGD-98-164, July 31, 1998

“Results in Brief -- INS records that are maintained for administrative purposes are the basis for most federal statistics on flow. These statistics describe the number of new legal permanent residents (persons with new green-card status), new refugees and asylees, and new naturalized citizens. As reported in the INS Yearbook, however, these statistics are limited by conceptual problems and confused reporting, undercounts, and information gaps. For example, data on annual trends in the number of new green cards authorized, although highlighted in the INS Yearbook, are significantly affected by INS’s administrative problems in processing green-card applicants and thus may not accurately reflect flow over time. The number of new asylees—persons granted asylum—and the number of persons granted citizenship are undercounted in the Yearbook tallies because the data omit certain groups of persons, such as those granted asylum on appeal or minor children of new citizens. Statistics for other demographic categories, such as the total number of foreign-born persons who take up residence in the United States each year, are not available....INS has made efforts to fill information gaps for some legal statuses by using the limited data that are available and creating assumption-based models. The resulting estimates are necessarily uncertain because assumptions and judgments are substituted for data.”

United States Department of Justice, Office of the Inspector General, *Follow-Up Report, Alleged Deception of Congress: The Congressional Task Force On Immigration Reform's Fact-Finding Visit To The Miami District of INS In June 1995*, September, 1997.

“Regarding record keeping, we found that some criminal history checks were not properly documented prior to the aliens' release; confusion exists among staff as to the proper designation of Medical Alerts on the booking card; and discrepancies still exist between Krome's manual processing log and the DACS.”

United States Department of Justice, Office of the Inspector General. *Immigration and Naturalization Service Monitoring of Nonimmigrant Overstays*, Report No. I-97-08, September 1997.

“NIIS does not contain departure records for a large number of aliens, most of whom INS believes have left the United States. INS believes most of these unrecorded departures result from either the failure of airlines to collect Forms I-94 from departing nonimmigrants; or from nonimmigrants departing through land borders. However, an unknown number of unrecorded departures are due to other factors such as data entry keying errors, and the failure of the system to properly match arrival and departure records. Also, in the past, some records were lost through electronic transmission or through tape-loading problems. INS collectively refers to these factors and missing Forms I-94 as ‘system error.’”

Statement of Michael R. Bromwich, Inspector General, U.S. Department of Justice before the Subcommittee on Immigration and Claims U.S. House of Representatives. *Alleged Deception of Congress: The Congressional Task Force on Immigration Reform's Fact-finding Visit to the Miami District of INS in June, 1995*, September 12, 1996

“Moreover, our investigation discovered grave discrepancies in the INS record-keeping systems at Krome and the Miami Airport. We found that paper records kept manually did not comport with computerized files purporting to memorialize the same information. Particularly as to alien movements, these discrepancies pose serious problems. Some aliens simply could not be accounted for in Krome's records -- a fact that must be remedied. Our audit staff has discussed these discrepancies with Miami District managers, but a follow-up check should be made to ensure that appropriate remedies are being implemented and are adequately addressing the problems. Moreover, spot checks should be undertaken to ensure that the same problems do not exist in other INS district offices.... In addition, I noted in the report that INS record-keeping systems need vast improvement. Written policies concerning the handling of aliens in hard secondary should be formulated.”

Department of Justice, Office of the Inspector General, Inspections Division, *Law Enforcement Support Center: Name-Based Systems Limit Ability to Identify Arrested Aliens*, GAO/AIMD-95-147, Aug. 21, 1995.

Records Corrections - INS employees have noted the need to delete or correct fraudulent records, particularly in the CIS. The CIS is the INS-wide electronic database that contains data on all aliens who have been assigned A-numbers since 1960. New York investigators had sought permission from Headquarters to delete fraudulent entries from CIS, but this request was denied. Personnel in the Records Division, who are responsible for maintenance of the CIS, told us that they believed fraudulent entries should not be deleted because it was important to maintain a history of what had occurred. They also feared that deletion of an entire fraudulently created record would make it easier for an unscrupulous employee to assign the same A-number to another alien without being detected. The Records Division staff also has received requests from field officers, both investigators and examiners, to place alerts in CIS to indicate fraud. In several instances, field officers created and recorded their own entries into CIS. The entries were inappropriately placed in data fields that have specific alpha/numeric criteria and, as invalid entries, they created problems within the database. Consequently, the records staff instructed field officers not to make these entries. To date, the records staff has been unable to offer them an alternative means of placing an alert in the system.

Department of Justice, Office of the Inspector General, Inspections Division, *Law Enforcement Support Center: Name-Based Systems Limit Ability to Identify Arrested Aliens*, GAO/AIMD-95-147, Aug. 21, 1995.

“The LESC pilot allows LEAs access to INS data 24 hours a day. However, because of limitations inherent in INS' name-based databases, LESC electronic searches cannot conclusively identify individuals arrested for aggravated felonies as aliens....Criminal alien information in INS' Deportable Alien Control System (DACS) database and the corresponding Central Index System (CIS) files is incomplete and inaccurate. According to our statistical sample of criminal aliens recorded in DACS, important information contained in INS paper files was missing from, or incorrectly entered into, the DACS electronic files. For example, 80 percent of the records in our sample did not contain all aliases used by the aliens, and 22 percent contained either misspelled names, incorrect name order, or incorrect nationality. Furthermore, DACS did not contain records of all the paper files it should have included, and some of the criminal alien files it did contain lacked the information needed to show that these persons were criminal aliens.”

Frank W. Reilly, Director, and Hazel E. Edwards, Director, Accounting and Information Management Division *Information Integrity, Using Technology to Determine Eligibility to Work and Receive Benefits*, GAO/T-AIMD-95-99 March 7, 1995.

“INS Telephone Verification System --We agree with INS that this type of verification system has potential for helping to reduce the number of ineligible alien workers. However, such a system is no better than the data on which it relies. How much INS uses time-consuming, expensive validation efforts, such as what is needed for the secondary validation, will depend on the extent to which the data in the primary database is inaccurate, incomplete, or out of date. We have reported on several occasions that INS’ database is incomplete and inaccurate [citing *Information Management: Immigration and Naturalization Service Lacks Ready Access to Essential Data* (GAO/IMTEC-90-75, Sept. 27, 1990); *Criminal Aliens: Majority Deported from the New York City Area Not Listed in INS’ Information Systems* (GAO/GGD-87-41BR, Mar. 3, 1987).] INS officials said they recognize that these problems continue to exist and that they are initiating several improvements.”

Prepared by Joan Friedland
With the assistance of Pooja Gehi
National Immigration Law Center
1101 14th St. NW
Washington DC 20005
202-216-0261
friedland@nilc-dc.org