

Final Recommendations

**ORGANIZATION
RESTRUCTURING**

**IMMIGRATION AND
NATURALIZATION SERVICE**

Washington, D.C.
March 9, 1998

*This report is confidential and intended solely for the use and
information of the organization to whom it is addressed.*

BOOZ·ALLEN & HAMILTON

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1. INTRODUCTION

Over the past few years, the Immigration and Naturalization Service (INS) has experienced significant growth. Increased volume of naturalization and other benefit applications, heightened activity along the southwest border, and a number of significant legislative changes, such as The Illegal Immigration Reform and Immigrant Responsibility Act of 1996, have complicated the execution of its mission.

The INS has received significant increases in resources to help it handle these additional responsibilities and workload—its budget allocations more than doubling from FY 1993 to 1998. This dramatic growth has strained the current organization and impacted performance. Problems with the naturalization process, backlogs in application processing, and questions about the agency's ability to prevent illegal immigration and effectively remove those who are already in the US continue to elicit comment and attention.

The INS has undertaken a number of efforts both to address these issues and to improve the agency's basic operations and infrastructure. Key efforts that INS has undertaken in the past few years to address its problems include:

- Reengineering the naturalization process
- Automating records and upgrading information technology infrastructure
- Integrating enforcement operations at the border through initiatives such as Gatekeeper and Rio Grande
- Restructuring Asylum Operations
- Removing significant numbers of criminal or deportable aliens

These efforts represent the beginnings of a major transformation of the agency that will take several years to complete. For the INS transformation to be successful, it must now fulfill four key imperatives:

- Develop clear lines of accountability
- Create customer-oriented service capabilities
- Build professional capabilities in law enforcement and services
- Fulfill INS's single mission: to uphold the immigration laws of the United States as intended by Congress.

Restructuring the organization is key to the transformation, but it is only a part of it. In order for the transformation to achieve the level of improvement INS and other stakeholders want, the way the agency does business must also change. These changes include new and different business processes, focused on timely and efficient operations; revised training programs that emphasize the professional standards that INS requires; ways of integrating between and within services and enforcement at all levels of the organization; and development of the infrastructure, especially the information infrastructure, necessary to allow the agency to operate effectively and efficiently.

The proposed organization structure presented in this document maintains the responsibility to execute the immigration and naturalization laws of the country under the singular authority of the INS. The INS has a single mission which is to execute the immigration policy of the United States. This single mission has two critical components that are inseparable: the extension of benefits to those who merit them and the protection of those benefits through enforcement for those who do not merit them. For example, when a person applies for benefits, a thorough screen for fraudulent documents is required to positively determine eligibility. Individuals apprehended at the border could turn out to be asylum applicants.

The following table provides additional examples of the close coordination and integration required between service and enforcement operations:

COORDINATION / INTEGRATION POINT	EXAMPLE
Status of an immigrant or alien can often change from a person receiving benefits to one suspected of illegal activity	A person overstays his/her visa and becomes an illegal alien
Real time interaction between enforcement and service staff is needed	Adjudicator interviewing applicant discovers marriage fraud and turns couple over to detention and investigations
Immigration laws can change requiring a coordinated approach when implementing new legislation	IIRIRA influenced both service and enforcement operations such as expedited removals, service centers issuing notices to appear for deportation proceedings

These integration points necessitate shared records and information management capabilities that produce accurate, accessible and available information for both service and enforcement personnel working together in the field. Coordinating common management and information systems between different government agencies has proven extremely complex and difficult with few success stories. Our recommendation is to execute the immigration laws and policy within a single agency—the INS.

1.1 Approach and Scope

The Department of Justice engaged Booz·Allen & Hamilton (Booz·Allen) to analyze the INS organization and operations and to propose alternative structures that could promote a more effective way to fulfill its mission and address current restructuring proposals. To accomplish this task in approximately nine weeks, Booz·Allen utilized senior consultants with law enforcement and service experience in both commercial and government operations who could quickly assess the current situation and test various structural elements.

Booz·Allen held over 80 interviews with INS staff, met several times with INS senior management including field managers, and visited district offices, a border patrol sector, and a regional office. A number of different data gathering techniques were used including reviewing existing reports and analyses, interviewing other consulting firms assisting INS in the implementation of new initiatives and benchmarking three federal agencies to learn from their experience. Three federal agencies were selected:

- Federal Bureau of Investigations—a law enforcement agency with a unique, highly decentralized field structure
- Social Security Administration—a successful service agency
- U. S. Customs Service—an organization with enforcement and service responsibilities that recently undertook a major restructuring effort that changed its organization

Booz·Allen designed the process to be highly interactive with INS senior management and selected field representatives. Hypotheses were developed and tested with INS, additional data gathered based upon the feedback, and conclusions presented. This cooperative process allowed Booz·Allen to gain necessary information rapidly while maintaining analytical independence.

Based on extensive experience with both commercial and federal government clients, Booz-Allen has developed several frameworks for assessing and designing organizations. The framework selected for INS consisted of seven key elements which together define the design and functionality of an organization. Figure 1 gives the framework used for the INS organizational analysis.

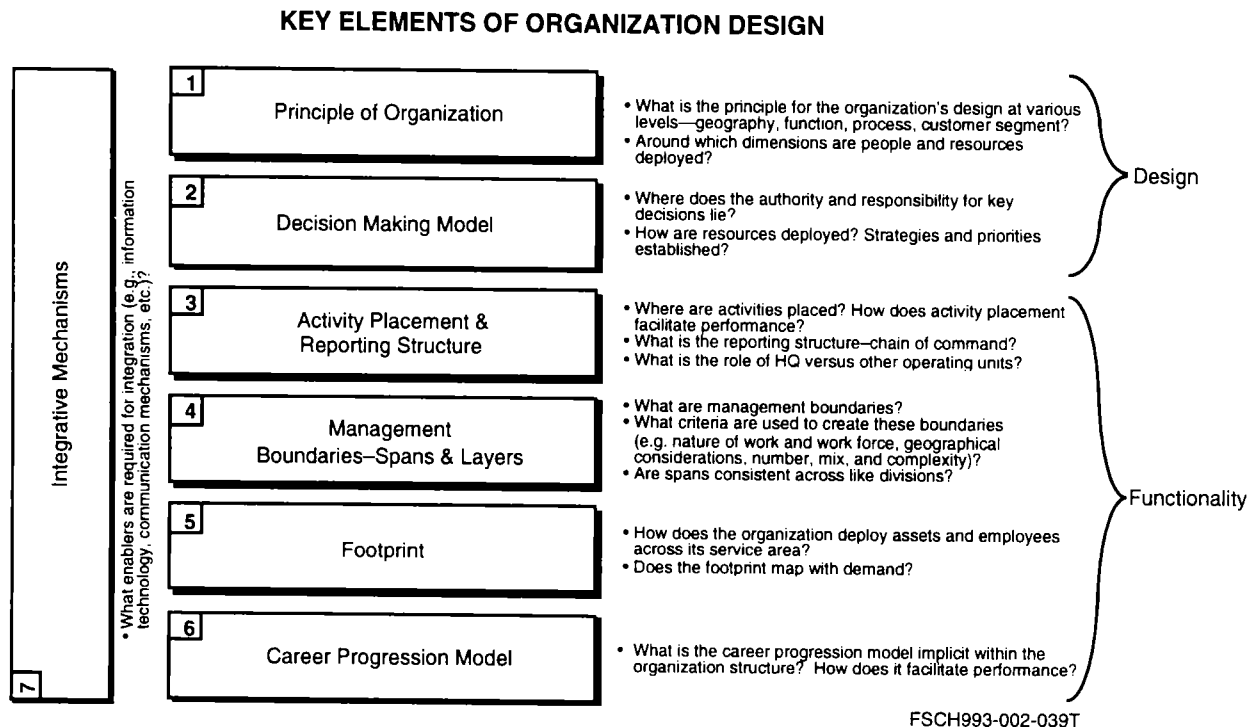
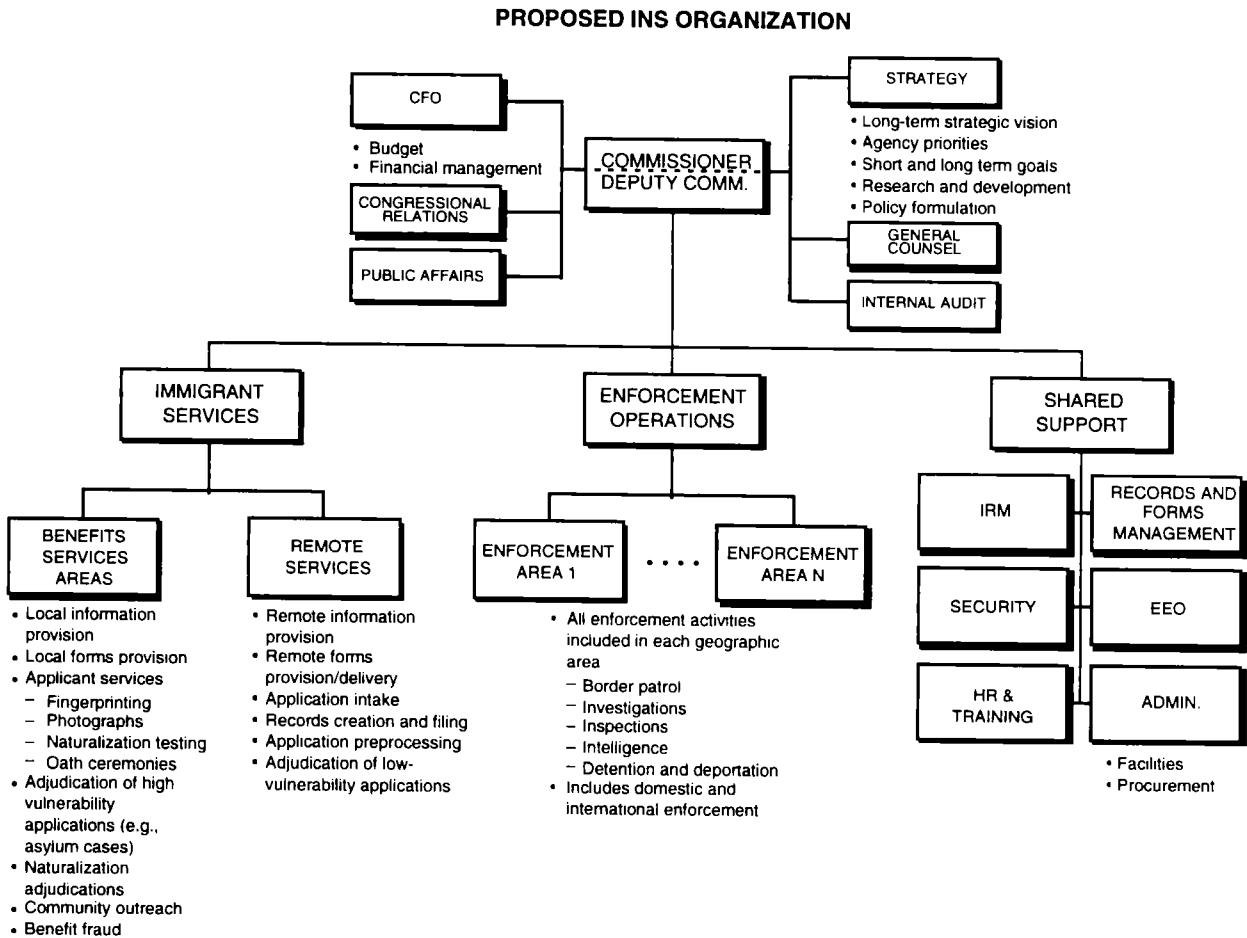


Figure 1: Key Elements of Organization Design

Booz-Allen used a methodology that forces top-down decision making. In designing a new organizational structure, several alternatives were considered around each of the design elements. For example, when determining the principle of organization, the team considered a number of options, organizing by customer segments, by geography, or by key functions. The best option was selected based upon how well that alternative satisfied the organizational imperatives. For example, "How well does this option create clear lines of accountability?"

2. PROPOSED ORGANIZATION STRUCTURE

Figure 2 shows the proposed high-level organizational structure. It represents the structure that best addressed the four organizational imperatives previously mentioned:



Note: Geographic boundaries for both Immigrant Services and Enforcement Operations to be examined and redrawn to fit new functions and responsibilities

FSCH993-002-053Wib

Figure 2: Proposed INS Organization

The majority of this report describes the proposed organization in detail which will be dramatically different from INS's current organization. It is worth summarizing these fundamental differences up front:

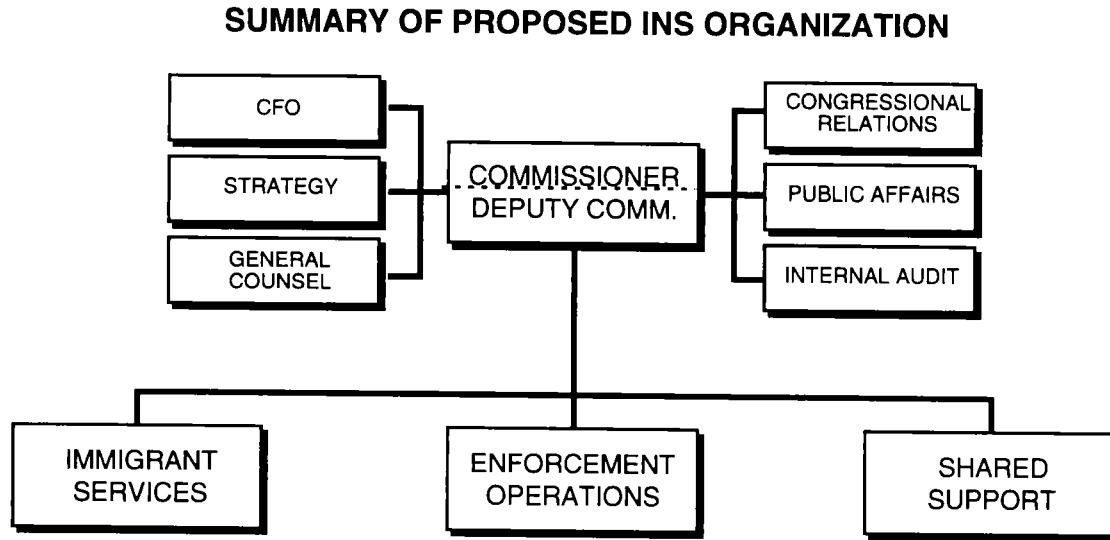
- HQ will focus on strategy, policy, goals and objectives, performance measurement, and provision of shared services in a support role to field operations—no involvement in day-to-day operations
- Accountability and responsibility for operations will be pushed down to the field
- Separate chains of command for service and enforcement operations will report to the Commissioner to establish clear lines of authority, responsibility, budget alignment, and execution of national priorities
- The geographic boundaries and footprints of service and enforcement operations will be different. Regional and district offices, as known today, will cease to exist. The field structure will be replaced by more targeted footprints that can focus on community needs
- Clear definition of law enforcement—pay reform legislation will be enacted to permit creation of an integrated enforcement division which includes inspectors
- More flexible career paths will be provided for staff within services and enforcement operations that are aligned to the staff's career needs. Separation and clarification of service operations from enforcement will allow leveraging the unique management knowledge, skills, and abilities required for each function
- Integration will take place with policy, process, information technology, training, and performance measures, not just organization—critical points of integration between service and enforcement have been identified

The recommended structure does not change every aspect of the INS. Rather, it tries to build on existing success stories such as the strength of the border patrol model and the restructured asylum organization and processes.

2.1 Summary of Proposed Organization

The high level recommended structure separates the agency into two core organization units—Immigrant Services and Enforcement Operations. Although services and enforcement must work together to fulfill the mission of the INS, execution of their functions is fundamentally different. Knowledge, skills and abilities across these functions are not easily transferable. For example, it is unlikely that one would want the head of service operations at American Express to be the chief of the Metropolitan Police Department.

Figure 3 presents a high-level summary of the recommended organization structure.



FSCH993-002-080Dc

Figure 3: Summary of Proposed INS Organization

Immigrant Services and Enforcement Operations would each report directly to the Deputy Commissioner. A senior executive manager, equivalent to a currently defined Executive Associate Commissioner (EAC), would head each of these units and would have full responsibility and accountability for executing operations at the field level. This structure clarifies accountability at the highest level which will be replicated throughout the lower levels of the organization. Individuals in the field would receive directions from one chain of command. They would be able to see a career path that extends from either adjudications officer or border patrol officer to HQ. This structure permits each operations unit to focus on those actions and initiatives necessary to develop “best in class” capabilities.

Implicit in the redesign is a redefinition of the role of headquarters. HQ becomes responsible for developing strategies, goals and objectives, policy, performance targets, and frameworks to set direction to implement national priorities. It provides support where economies of scale suggest increased efficiencies and effectiveness or where consistency and standardization are critical. In line with the current direction of successful commercial corporate offices, it also implies small and focused corporate staffs that see their roles supporting, not directing, operations.

In addition to the two key mission-delivery operational units, the recommendation defines a shared support structure responsible for the provision of administrative activities. The Shared Support division is modeled after a “shared services” structure that is a well established practice in a number of leading Fortune 500 companies. It is important to recognize that shared services units are not staff functions. They are executional in nature and should be led by an executive at the same level as operating units.

A shared services organization balances the need for local provision of support with the ability to capture economies of scale across the agency. It differs from traditional provision of services on a centralized basis. Service level agreements are developed between a shared service unit and its operational customers which spell out the level of quality, timeliness, and service expected. In this sense, the relationship between a shared services unit and the field is similar to a vendor-client agreement or contract. If services could be more effectively performed by a vendor outside the agency, the shared services division encourages the organization to consider outsourcing the activity.

The next building block of the proposed high level structure is the Strategy unit. This unit would focus on developing the long term-strategy of the INS and facilitating the process of designing programs to execute that strategy. Program execution, however, should fall squarely into Immigrant Services and Enforcement Operations. The function of the Strategy unit is to plan, with active participation from the field, but not to be responsible for day to day operations. The current Office of Programs and Office of Policy and Planning would cease to exist—its policy, program, and design responsibilities moved to the new Strategy unit and other operational/executional functions moved into Immigrant Services and Enforcement Operations.

In addition to these units, other staff and advisory units will exist and report directly to the Commissioner. These units include General Counsel, Internal Audit, Public Affairs and Congressional Relations. The recommendation also creates a formal Chief Financial Officer reporting directly to the Commissioner. It is suggested that General Counsel maintain the current reporting relationship to the Commissioner, but further analysis is desirable to detail the impact of the service/enforcement split on today’s District Counsel operations. Internal Audit continues its role as an independent office reporting to the Commissioner.

A detailed description of the organization structure is presented in the following sections.

2.2 Immigrant Services

This structure creates one division responsible and accountable for all aspects of INS service operations. Given the increasing demands on the agency and complexity of the work, a focused approach to service provision with dedicated, well-trained, service operations professionals is required to improve agency performance. Immigrant Services includes activities associated with the provision of benefits: information provision, application adjudication, oath administration and associated support activities (e.g., fingerprinting, test administration). This division also includes capabilities to combat benefits fraud.

This proposed structure differs from the current organization. Today, a District Director is responsible for managing both service operations and enforcement activities. The new model separates responsibility for management of service operations (Immigrant Services) from enforcement. Integration across Immigrant Services and Enforcement Operations will take place through policy, process, information technology, training, and performance measures.

Immigrant Services is organized along functional lines and has two broad components:

- Benefits Service Areas (Local/Community Services)—includes those functions that are community-based and require face-to-face contact with an applicant, petitioner or other individual in order to perform them (e.g. a naturalization interview, fingerprinting)
- Remote Services—includes those activities which benefit from economies of scale, can be performed from a remote location and require consistency in execution (e.g. file creation, phone center operations)

Figure 4 below presents the proposed organization structure for Immigrant Services.

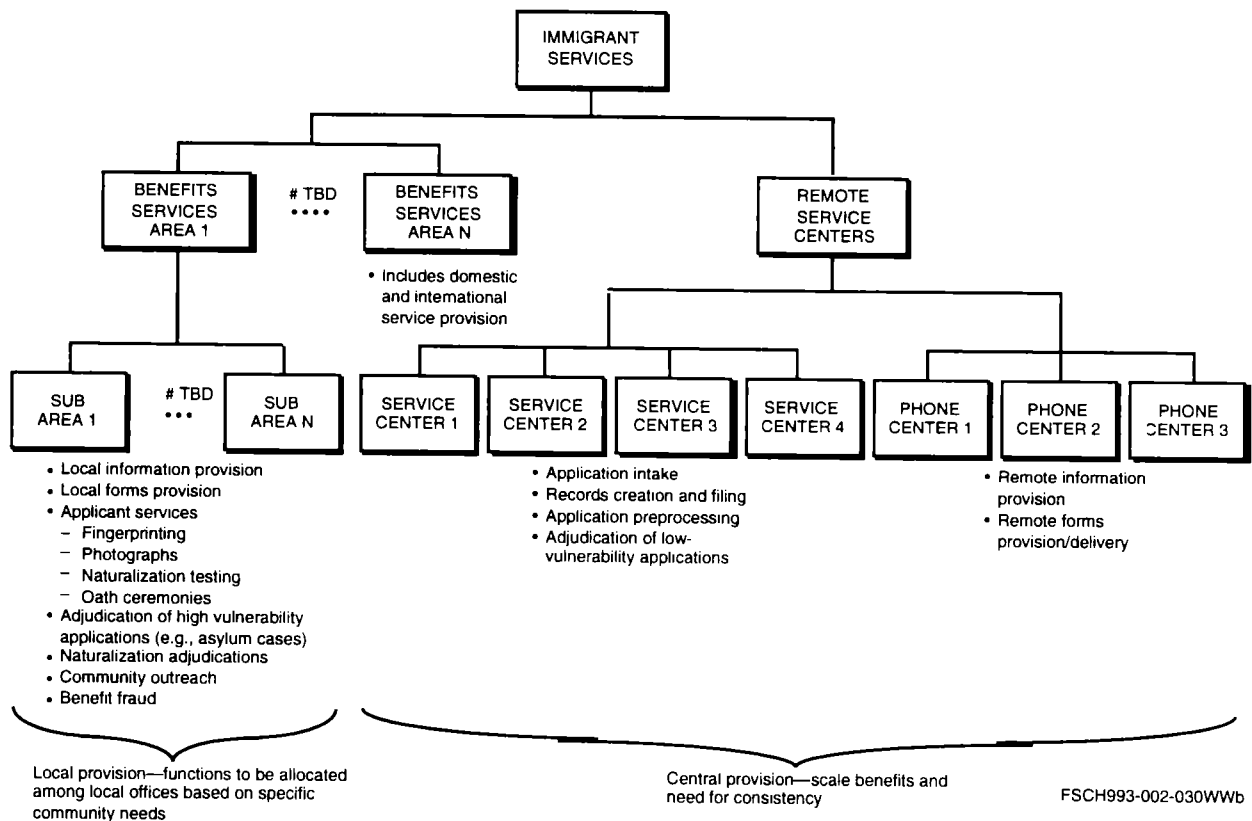


Figure 4: Immigrant Services Structure

Benefits Service Areas (local service provision)

Benefits Service Areas (BSAs) are geographic management units responsible for local service provision—in other words, those activities that require face-to-face contact with the community. The Benefits Service Areas would provide the following types of functions, all of which require local interface with an applicant for benefits:

- Local information and forms provision (Note: Could also be provided remotely via telephone or through other channels to improve accessibility and convenience)
- Applicant services
 - Fingerprinting
 - Photographs
 - Naturalization testing
 - Oath administration
- Adjudication of high vulnerability applications, those that require an interview or where there is a significant potential for fraud

Figure 5 provides an overview of the Benefits Service Area structure.

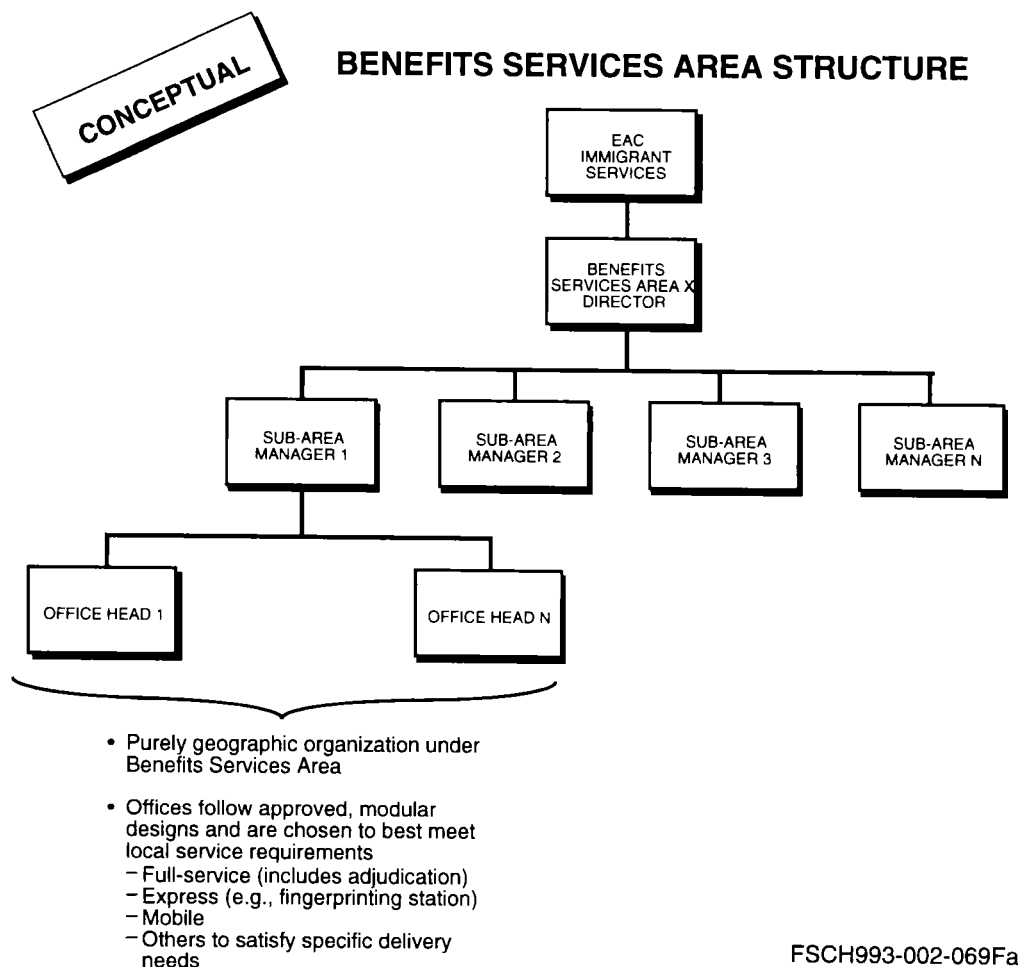


Figure 5: Benefits Service Area Structure

While additional work, with significant input from the field, needs to be done to determine the exact number of BSAs and boundary lines, a preliminary analysis was performed to test the proof of concept and to highlight differences from the current structure:

- Benefits Service Areas replace both the current Regions and Districts. Each BSA would have a director responsible for all local service provision within a given geography. This director would report directly to the EAC of Immigrant Services
- Based upon distribution of demand (i.e., application volumes by geography) and a preliminary understanding of differing community needs, it appears that between 6 and 12 BSAs should be created. This structure produces a reasonable span of control for the EAC of Immigrant Services and yet a “manageable” area in which a BSA director can effectively monitor performance and manage operations
- Each Benefits Service Area director would oversee a number of Sub-Area Managers who are responsible for a smaller geography within a given BSA. These Sub-Areas will include a number of local offices. The Sub-Area management layer is needed to provide appropriate management oversight in a decentralized service provision model
- There will be templates for different types of local offices, ranging from full-service offices (i.e., includes adjudications) to specialized fingerprinting centers. The templates will ensure consistent “look and feel” and operating procedures across the country. The BSA director will deploy different office types throughout the BSA to meet local service requirements

Figure 6 demonstrates what a potential Benefits Service Area could look like with a variety of office types and decentralized service provision.

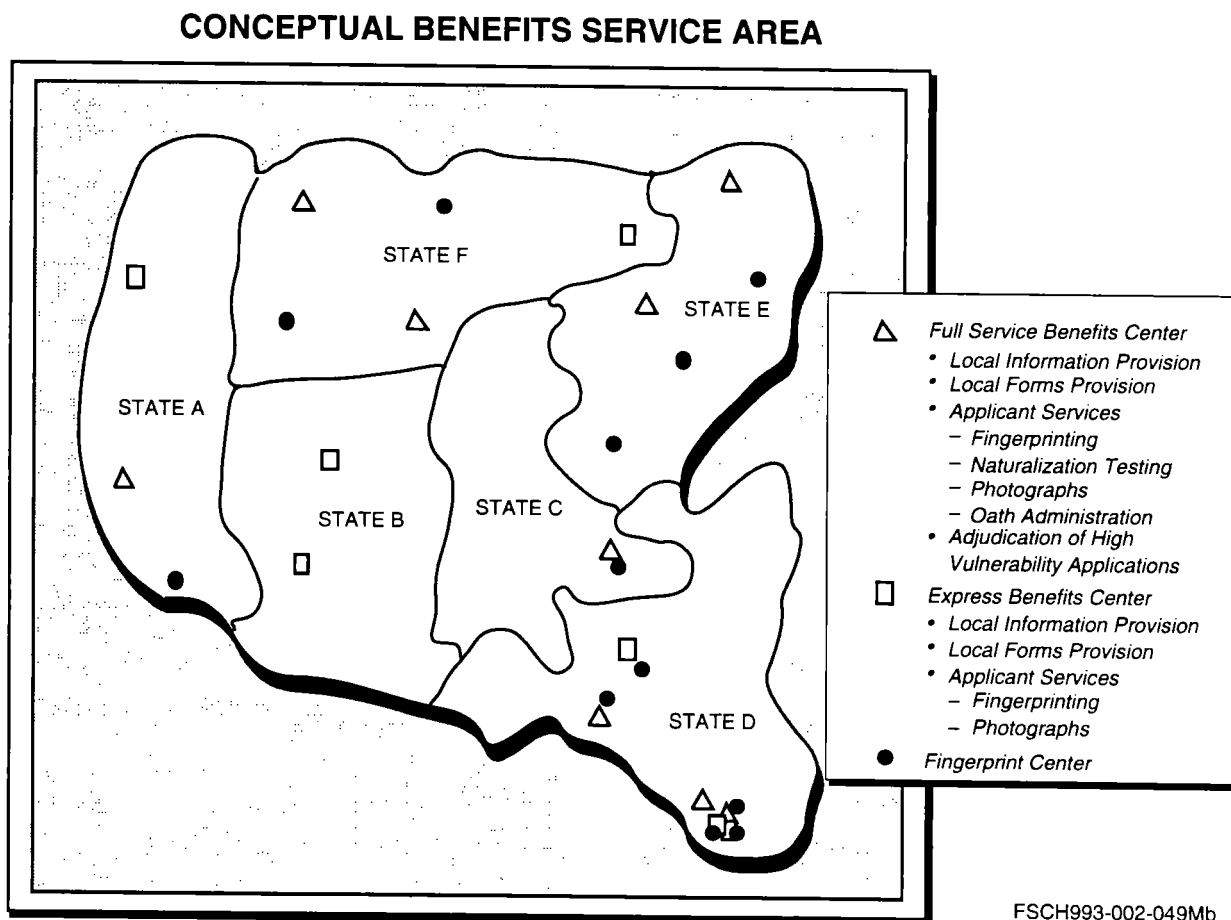


Figure 6: Conceptual Benefits Service Area

Remote Services

Remote Services is the second major component of Immigrant Services. This unit provides services that can be provided remotely and assists in application processing. Remote Services can include activities currently performed in 4 Service Centers and 3 Phone Centers, such as:

- Remote information provision (via 1-800 phone numbers, Internet, etc.)
- Remote forms provision
- Applications intake
- Records creation
- Application pre-processing
- Adjudication of low-vulnerability applications (e.g. extension of stay, employment authorizations)

These functions are combined into a single management unit to facilitate the standardization of operating procedures and to permit more effective workload management across the country. Today, for example, there is minimal re-allocation of work from one service center to another, even if processing delays at one location are far greater than at others. In this new structure, the Director of Remote Services has the authority to monitor workload volumes in remote sites across the country and move work as required to maintain service levels. This management approach for scale sensitive activities is utilized by leading commercial service operations to optimize resource allocation and ensure that service levels are maintained across geographies.

Career Paths and Progression

The Immigrant Services structure produces a more robust career path with clear progression potential. Clear career paths are a critical requirement in INS's effort to develop best-in-class customer service capabilities. Today there is a limited ability for service professionals to reach the upper management ranks without enforcement experience. For example, of the 33 incumbent District Directors, only 2 came from a strictly services background. As most of these District Directors lack extensive benefits experience and training, they may not possess the knowledge, skills and abilities needed to effectively manage complicated service operations.

Figure 7 presents a preliminary career path for service professionals in the new organization structure.

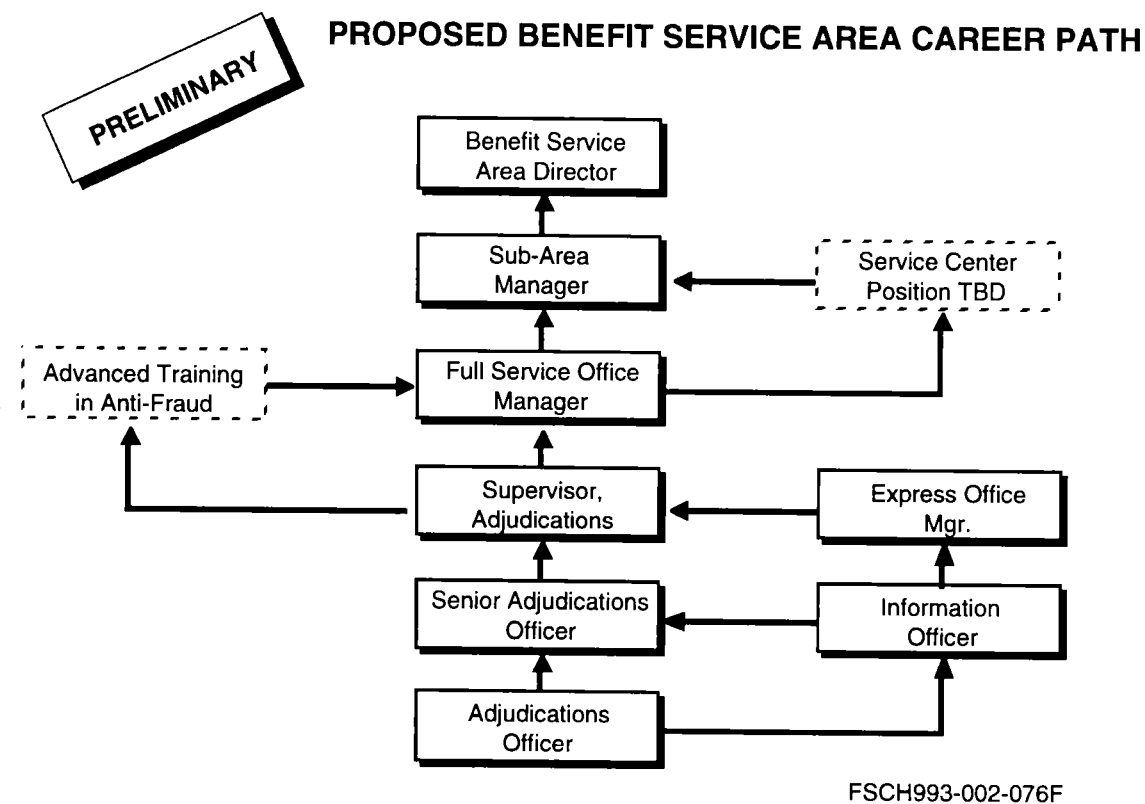


Figure 7: Conceptual Benefits Career Path

The proposed career path depicted in Figure 7 allows for succession and appropriate progression. It also provides a more effective entry strategy for new staff. Under this model, the entry-level position is that of a junior Adjudications Officer. This new entry level position ensures that staff develop a thorough understanding of INS's operations before moving on to handling public requests and questions as an Information Officer. Information Officers are the first face to the customer and leave a lasting impression of the INS, hence the need for more experienced staff. This change could require a reclassification of grade level for the Information Officer (i.e. may need to upgrade the position).

2.3 Enforcement Operations

Enforcement Operations encompasses all activities related to the enforcement of immigration laws, both at the border and within the interior. This structure provides a single point of responsibility and accountability for all enforcement, and allows the agency to more focus on integrated enforcement on a national or global scale.

This proposed structure is noticeably different from the current organization. As previously discussed, under the current organization the Districts are responsible for service and enforcement operations. This new structure separates all enforcement-related activities from service operations.

Enforcement Operations is organized geographically into Enforcement Areas, integrating all enforcement resources under a single chain of command. Field interviews revealed the need for close coordination of day-to-day operations among the enforcement disciplines. The design of an enforcement area gives the Area Director the ability to integrate Border Patrol, Ports of Entry, Detention, and Investigations and Removals, to prioritize and coordinate operations.

Initial analyses suggest that between 6 and 12 Enforcement Areas should be created to replace the current Regions and Districts with a completely different structure designed specifically for enforcement. Each Enforcement Area will include four major elements:

- Border Patrol—patrol between ports of entry (POEs) as currently performed by the Border Patrol
- Ports of Entry—inspections at POEs (air, land and sea ports) in cooperation with Customs, the Department of Agriculture and other inspection agencies
- Investigations and Removals—proactive management of cases in key program areas, such as fraud, work site, anti-smuggling, and criminal aliens, as well as processing of removals for deportable aliens
- Detention and Enforcement Support—long-term detention and other activities that support Border Patrol, Ports of Entry and Investigations and Removals

Figure 8 shows the proposed structure for Enforcement Operations.

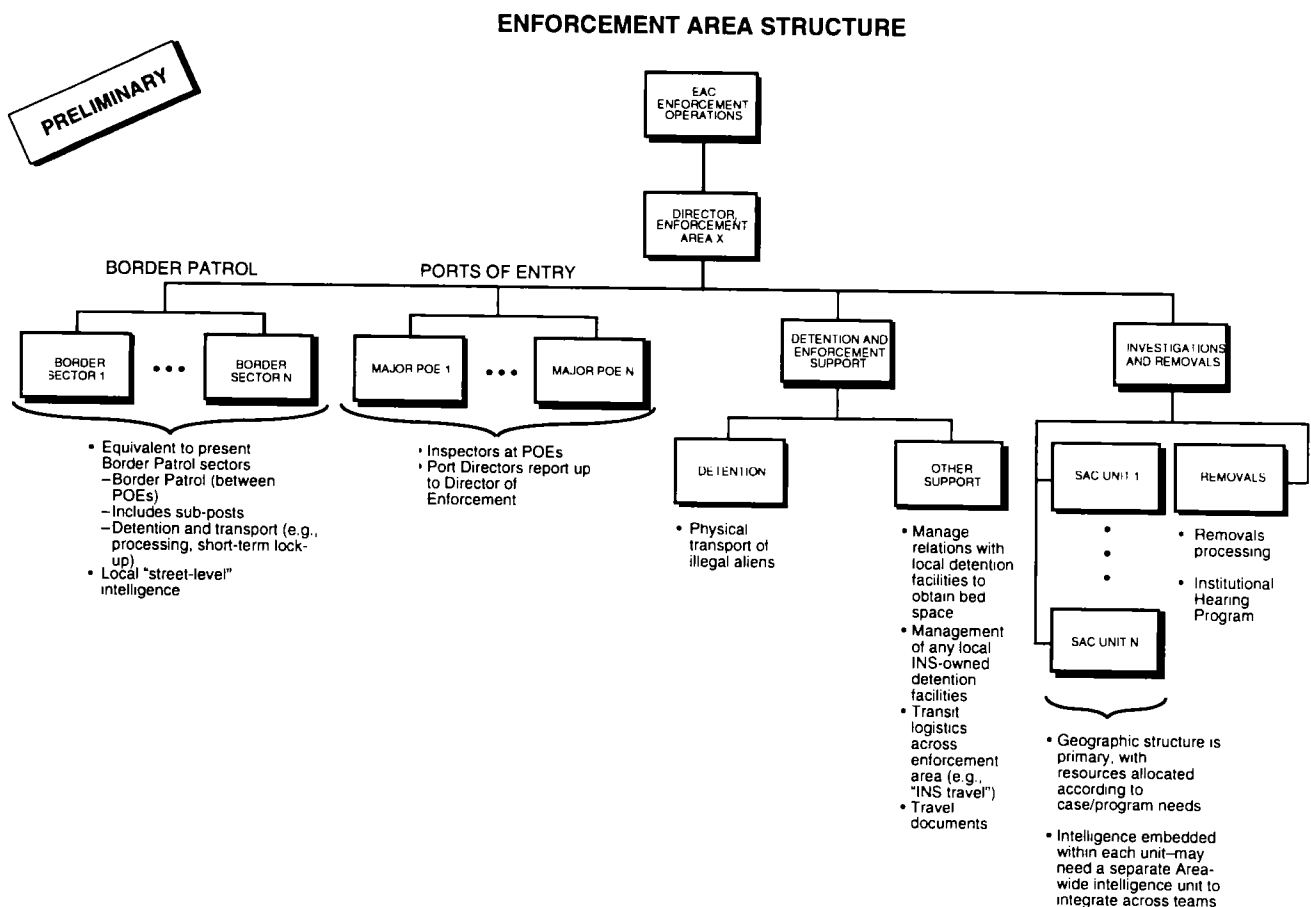


Figure 8: Enforcement Area Structure

Border Patrol

Border Patrol will continue to have responsibility for patrol of the border in between ports of entry. Border Sector Chiefs would report to the Director of the Enforcement Area (see Figure 8 above).

Ports of Entry

This unit includes inspections at air, land and sea ports of entry. Port Directors would report to the Director of the Enforcement Area. This structure facilitates an integrated approach to border management and promotes cooperation with other inspections agencies (e.g. customs).

The recommended structure would require legislative action to permit reclassification of the inspector as an enforcement position. Today only senior inspectors are classified as enforcement. Reclassification is needed to integrate inspectors into the enforcement division and permit career progression. Best practice law enforcement organizations have common core training programs and clear career paths that permit movement throughout the organization across disciplines.

Investigations and Removals

Investigations and Removals (I&R) focuses on illegal immigration: fraud, anti-smuggling, criminal aliens, and worksite enforcement, as well as participation in joint task forces with other enforcement agencies. The I&R unit is responsible for intelligence gathering, investigation and identification of criminal activity, and the apprehension and removal of illegal immigrants. I&R is a separate unit to reflect fundamental differences in the nature of the work (case-based), the skills required, and best practices in law enforcement organizations.

The recommendation suggests that I&R operates geographically, as do both the FBI and Customs—with a SAC/RAC model. A Special Agent in Charge (SAC) commands a field office with associated satellite offices led by Resident Agents in Charge (RACs). This model provides local focus and manageable spans of control, as well as an integrated team across an Enforcement Area, all of which are necessary to ensure effective investigative operations.

Detention and Enforcement Support

Detention and Enforcement Support encompasses those activities that cross-cut and support Border Patrol, Ports of Entry and Investigations and Removals. Some of the activities in this division could be provided by “civilians” rather than law enforcement personnel (e.g. detention logistics) or could possibly be outsourced (e.g., detention facilities). Other best practice law enforcement agencies have “civilianized” many support positions, e.g., in some police departments the dispatch function is now performed by civilians.

Detention and Enforcement Support ensures that the entire Enforcement Area has the level of assistance needed for a best-in-class enforcement operation. It is important to note that detention as described in this unit refers to long-term detention as opposed to temporary lock-up during processing. Temporary detention capabilities and staff will be embedded in Border Patrol and report through that chain of command (as is the case today).

Career Paths and Progression

The Enforcement Operations structure makes it possible to have an integrated career path and upward mobility for all enforcement professionals. Today, movement from certain law enforcement occupations into others rarely occurs, thus limiting upward mobility. The proposed career path will help eliminate these problems. Figure 9 gives an example of the new enforcement career path.

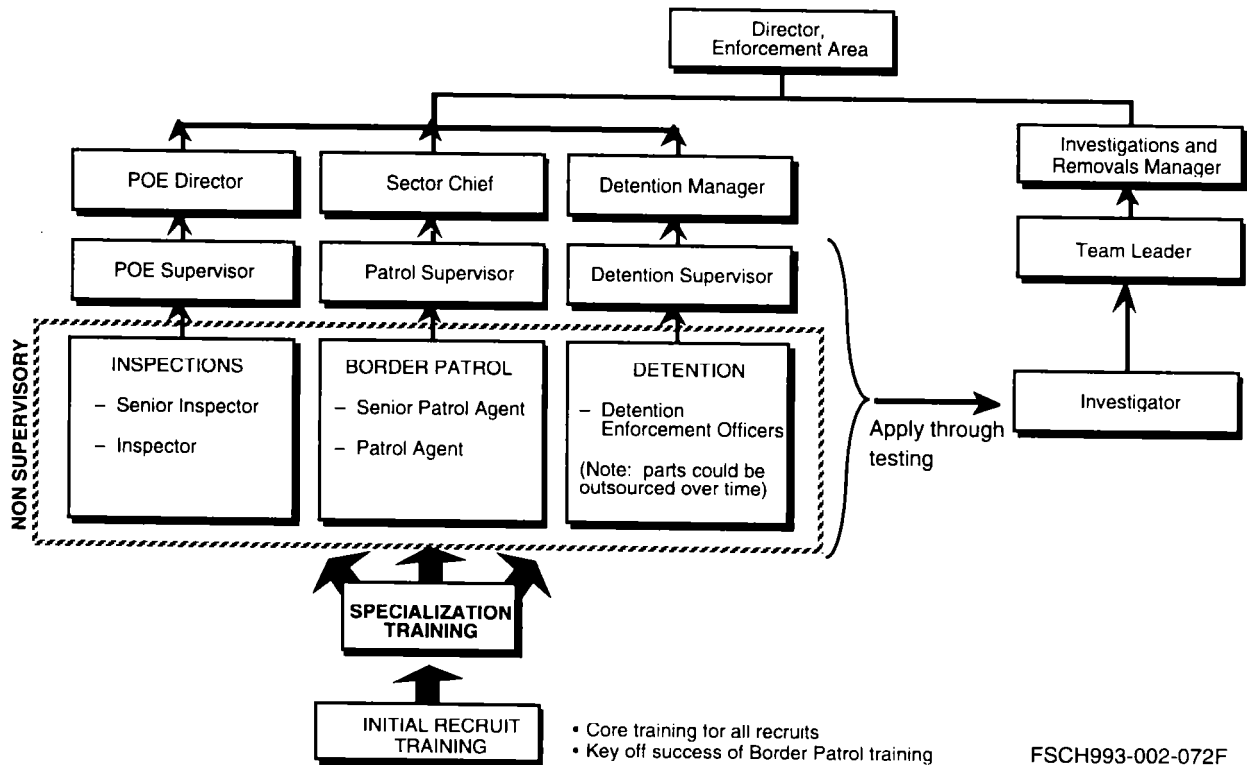


Figure 9: Enforcement Career Path

2.4 Shared Support

Shared Support performs critical integration activities and develops agency infrastructure. This division provides the "glue" that links together operations across divisions and geographies. It includes Records Management and Information Resources Management as well as administrative support for the field: Human Resources and Training, Security, EEO and other Administration (procurement and facilities). In a shared support structure, activities could be provided in a number of locations:

- At the local level—I/T infrastructure is critical to enable provision of support at this level
- Shared across geographies—to capture economies of scale and ensure consistency of operations
- At headquarters—policy and procedure setting activities

Figure 10 gives an overview of Shared Support, detailing how HR activities could be organized.

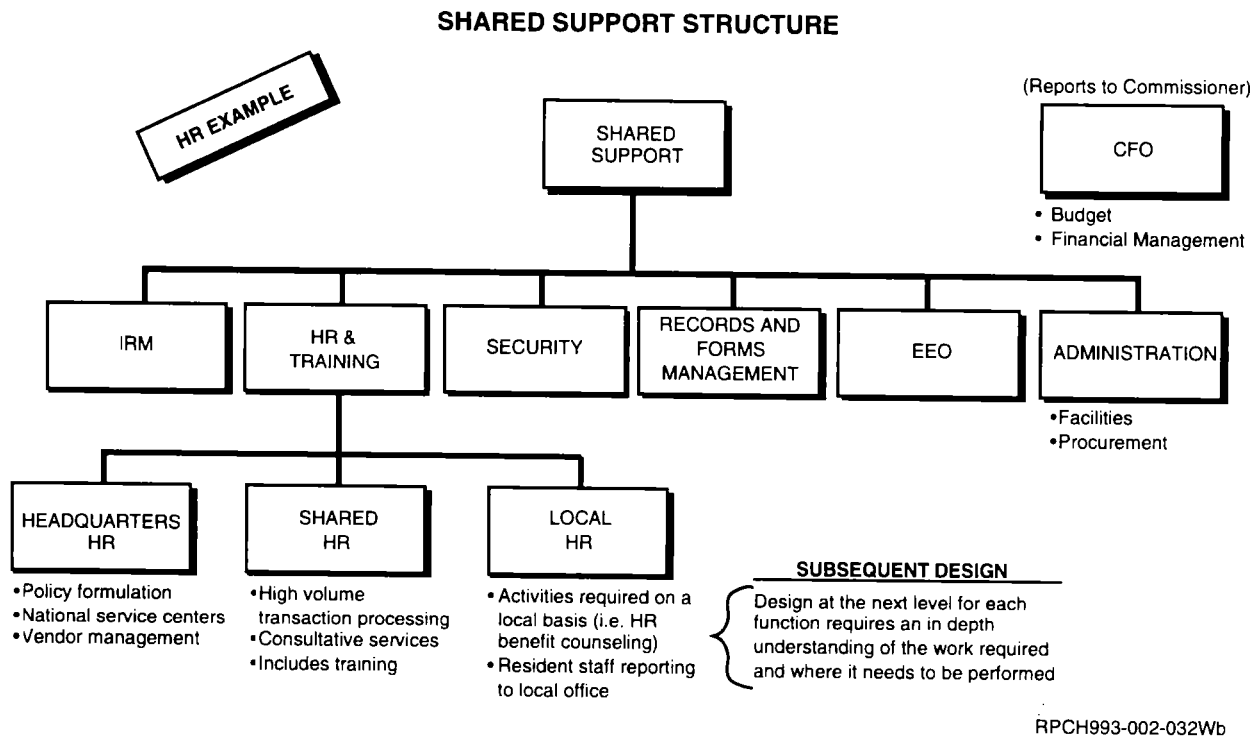


Figure 10: Shared Support Structure

Rationale for Local Support Functions

Certain administrative activities, such as EEO counseling and HR benefit counseling, need to be provided on a local basis. Not every physical location will need a local presence. For example, service can be provided from a field office or a full service office to a small satellite location. Local support staff will report up through the field office chain of command. For example, an HR professional resident in a Benefits Service Area, would report up through the Immigrant Services chain of command. Further analysis is required to determine how local service and enforcement field offices could “share” local support to prevent unnecessary duplication while maintaining needed levels of support to get the job done.

Rationale for Shared Functions

Two types of administrative support are prime candidates for provision on a shared basis. The first type of support includes high volume transaction processing such as payroll and expense reimbursement processing. These activities are scale sensitive and can be performed remotely. Many of these activities are currently performed in one of four Administrative Centers. This type of arrangement should continue, but with management boundaries re-drawn to support the new field structure. For example, the Administrative Center in Dallas today serves primarily those districts and sectors in the Central Region. In the future, this Administrative Center may serve different Service and Enforcement Areas.

A second type of support provided on a shared basis includes those activities that are consultative in nature and in general require a good deal of specialized knowledge or expertise. A typical field office may not have a need for this service on a full-time basis, but needs the expertise available “on demand.” A good example of this type of support is labor union arbitration.

Rationale for HQ Functions

The types of activities considered for placement at headquarters include those that potentially expose the INS to significant legal, financial or management/personnel risks. Examples include:

RISK	EXAMPLE
• Legal	• Compliance monitoring (e.g., Americans With Disabilities Act)
• Financial	• Outsourcing of payroll capabilities • Decision to purchase HR system (e.g., PeopleSoft)
• Management/Personnel	• Union relations • OPM negotiations

2.5 Strategy

The Strategy organization is an analytical unit responsible for the development of the INS's long-term strategy, including planning and R&D, but excluding all operational functions. This unit is also responsible for agency policy formulation, GPRA planning and evaluation, and definition of agency performance measures. Strategy will be held primarily accountable for a number of key processes that integrate the service and enforcement arms of the INS, including:

- INS-wide policy setting and monitoring
- Strategic planning (most similar to developing the Commissioner's Priorities and long-term plans)
- Research and development—facilitating a process to develop programs that operationalize the strategic plan
- INS-wide performance management—defining performance measures and reporting progress against strategic goals (including Statistics)

To clarify Strategy's role as a process facilitator the recommendation also outlines a high-level process for research and development. The Strategy unit would serve as the focal point for creating and facilitating Task Forces that are responsible for the actual program design. These Task Forces would contain representatives from the units accountable for the program, from the field and headquarters, to provide the necessary expertise for effective R&D. Examples of tasks managed by R&D might include:

- Design of templates for model Immigrant Services offices
- Design of a closed-loop process for managing hand-offs between service and enforcement (e.g., in fraud cases)

This process ensures that Strategy serves as a facilitator while preserving the operational chains of command, and that research and development is closely linked to the INS's strategy. Benchmarking revealed that this task force approach works well for the Social Security Administration as a means to integrate various operational units and perform agency-wide planning. While many activities included in this new Strategy unit are currently performed by the Office of Programs, Programs also has a number of operational responsibilities that need to be moved into operations areas as part of this restructuring.

2.6 Other Functional Units

There are several other units, most of which are staff functions (i.e., Congressional Relations, General Counsel, Internal Audit, and Public Affairs) that play an advisory role providing guidance to the Commissioner and INS Senior Management team. The recommended structure includes all of these activities as distinct units with a reporting relationship direct to the Commissioner (as exists today).

This direct reporting relationship is especially important for the Office of Internal Audit. Organizationally, this office must remain independent from other INS offices in order to properly accomplish its mission to review and evaluate the efficiency and effectiveness of INS operations and resolve alleged misconduct by agency employees.

General Counsel (GC) has a dual role in the INS, both the conventional advisory role and a key operational responsibility in local offices with respect to prosecuting removal cases in the Immigration Courts. Until further analysis can be performed to detail the implications of the service/enforcement split on General Counsel operations, Booz-Allen recommends maintaining the current reporting structure. This reporting relationship, with GC staff reporting directly to the Commissioner, creates an independent legal division that promotes appropriate checks and balances. GC operational priorities (e.g. which types of cases are prosecuted first), however, must be aligned with Immigrant Services and Enforcement Operations priorities in the field.

Although Booz-Allen did not extensively study the budget and financial management functions, it sees no reason why a separate CFO should not report directly to the Commissioner in accordance with the recommendation of the NAPA Report. Associated with this recommendation is the need to redesign and simplify the budget account structure to provide more flexibility in day-to-day operations. This issue is discussed in greater detail in the last section of the report.

In the current organization, International Affairs is a distinct Region that includes international service and enforcement operations, as well as a separate group to handle Asylum/Refugee petitions. Under the new organization structure, International Affairs would be split into Immigrant Services and Enforcement Operations, potentially as separate geographic units reporting to these EACs. A detailed analysis of international activities is required to further detail the design of international field operations and its interagency and liaison responsibilities.

Booz-Allen recommends including asylum petitions in the Immigrant Services organization, taking care not to reverse recent performance improvements in asylum processing. In all likelihood adjudication of asylum petitions will remain an area of required special expertise and hence may only be performed in a handful of local offices. It is anticipated that the new Immigrant Services structure will be able to incorporate the effectiveness of the asylum process into local service operations (e.g., integrating with immigration courts).

3. BENEFITS OF THE NEW ORGANIZATION

As was stated at the beginning of this report, the proposed reorganization of INS addresses several critical issues the agency faces and serves as a major step in its transformation. The discussion has highlighted how the new organization will address key issues and concerns. This summary of these benefits is summarized in Figure 11:

ORGANIZATIONAL IMPERATIVE	CURRENT PERFORMANCE ISSUES	HOW NEW ORGANIZATION ADDRESSES IMPERATIVES
1. Develop clear lines of accountability	- Lines of accountability and responsibility are blurred in the current organization because: - INS lacks a clear principle of organization (clear focal point around which people and activities are aligned) - The decision making model—where and by whom decisions are made—varies, confusing accountability and producing inconsistent execution in the field - Activity placement exacerbates the accountability issue, with operational activities resident in program areas and vice versa	- Primary alignment of the new organization is clear with a split between service and enforcement operations - Clear chains of command and all operational decisions pushed down to the field - Activities rationalized at the local level—HQ focus is on policy and strategy, execution performed in the field
2. Create customer-oriented service capabilities	- Regions and Districts have been allowed to develop their own operating models, creating a different look and feel to INS Immigrant Services across geographies - Allocation of resources does not appear to map to demand, but rather to be driven by the existing district/sector structure	- Promote consistent service levels and “look and feel” across geographies - Remote service structure permits level loading across worksites - Creation of standard field office templates facilitates a consistent “look and feel” - The current region and district structure is replaced by service areas and enforcement areas that can focus on local community needs
3. Build professional capabilities in law enforcement and services	- The current structure has created operations silos to effectively manage difficult populations or activities - Management boundaries are simultaneously too big and too small – regions are too big to be effective, and some districts are too small to permit coordinated efforts - No clear career progression models exist, producing inconsistent knowledge, skills, and abilities throughout the organization	- Immigrant Services includes all benefits provision activities, including asylum - Structure promotes an integrated approach to border management and overall INS enforcement - Value added management levels—unnecessary layers eliminated - Clear career model and progression for INS employees - Separation of Immigrant Services from enforcement will allow each to focus on the unique management knowledge, skills, and abilities required to carry out these distinct functions
4. Fulfill the singular INS mission: to uphold the immigration laws of United States as intended by Congress	Integrative mechanisms (i.e., means of integration between service and enforcement) are informal and not institutionalized, producing ineffective and inconsistent execution of the mission	- Consistent interpretation of immigration laws as required by INS's singular mission - Integration will be accomplished at all levels of the organization through policy, process and technology, e.g., - Shared records - Fraud detection and prevention - Training

Figure 11: Benefits of the New Organization

4. IMPLEMENTATION AND NEXT STEPS

While this document has focused on proposing a new organization structure for the INS, structure is only one of six key components of any successful transformation program. For example, the current INS budget account structure is complex with thousands of sub-accounts. This complexity may result in less than optimal allocation of resources. The budget account structure should be simplified to visibly reflect budget priorities defined by Congress, reinforce accountability in the organization and permit flexibility to meet changing demands in the field. Figure 12 shows the key components of a successful transformation program.

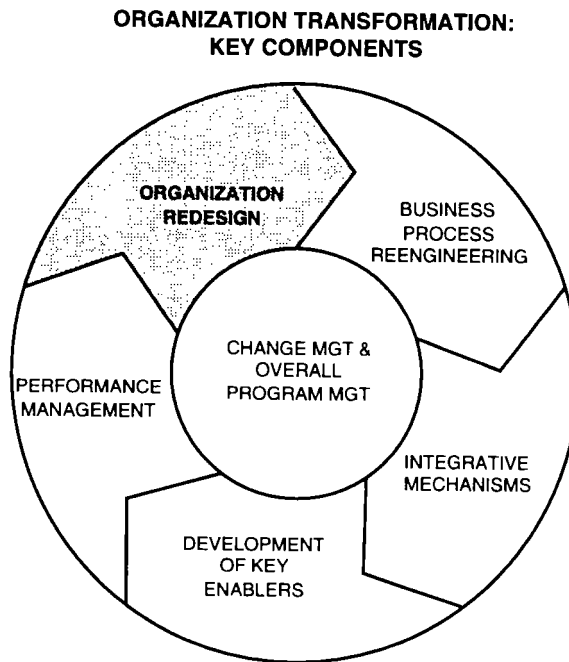
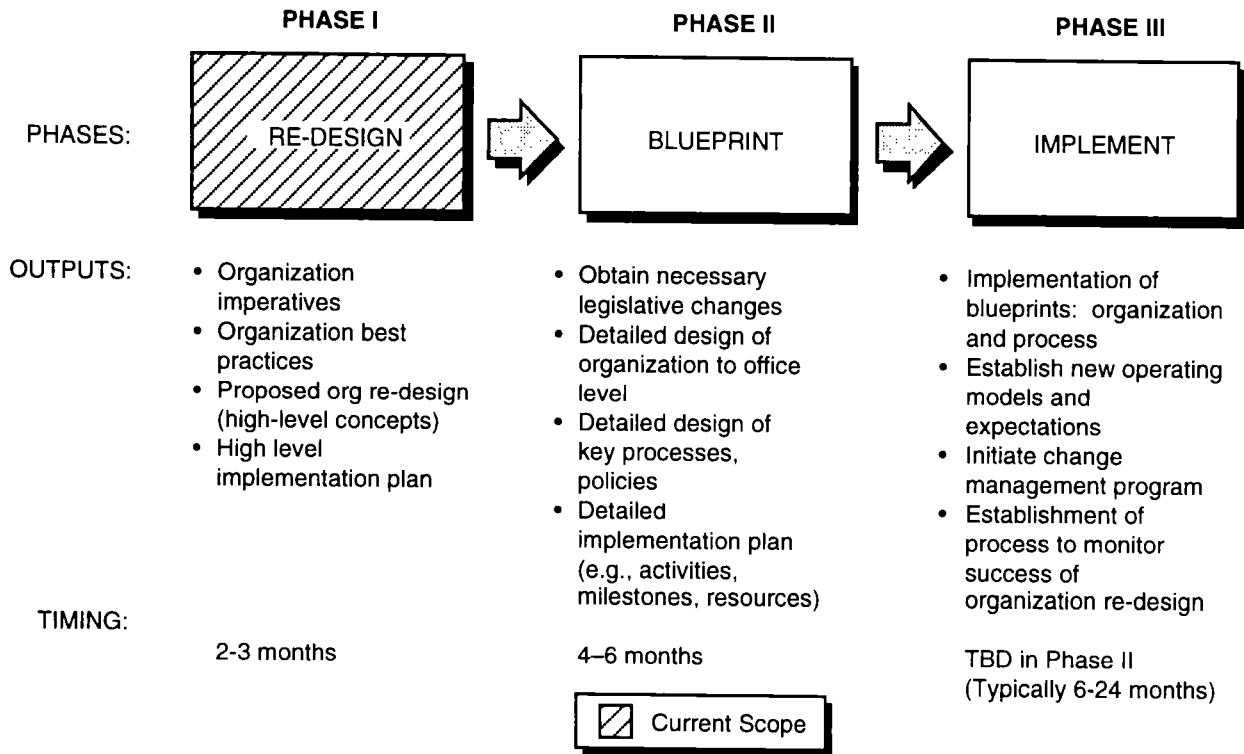


Figure 12: Key Components of Organization Transformation

The INS is committed to move forward with its organization transformation. Typically these massive change programs take several years to successfully complete. This document outlines the vision for how the agency will operate within its new structure. Creating the vision is the first phase in the change process. The next phase, blueprinting, will require additional analysis to detail to how the organization will look and operate. Figure 13 shows the three phases of organization re-design and implementation:

ORGANIZATION RE-DESIGN AND IMPLEMENTATION



FSCH993-002-066F

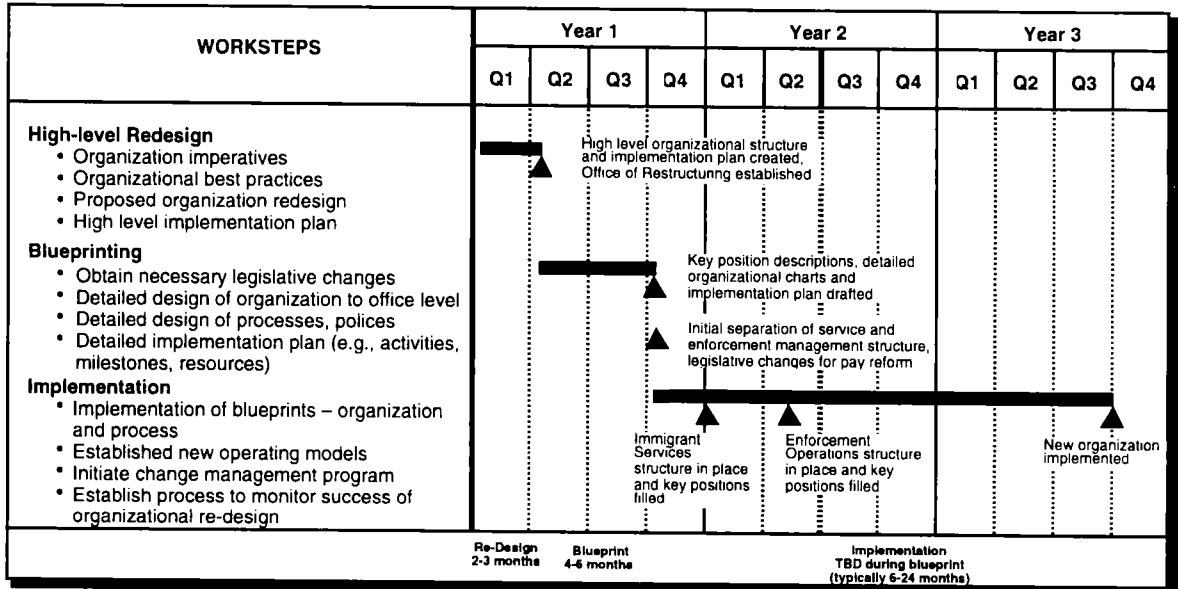
Figure 13: Phased Approach to Implementation

Immigrant Services changes should be implemented first. In the near term, however, detailed transformation plans ("blueprints") should be developed for both Immigrant Services and Enforcement Operations at the same time. Once Immigrant Services is running effectively, INS can then turn to transforming its enforcement capabilities. This will ensure that immigration enforcement continues with minimal disruption while Immigrant Services is put in place.

Figure 14 presents a preliminary high level implementation plan:

DRAFT

HIGH-LEVEL ORGANIZATION RE-DESIGN IMPLEMENTATION PLAN



▲ Key Deliverables

FSCH993-002-077F

Note: Additional detail will be added to this implementation plan during March and April

Figure 14: High Level Implementation Plan

The organization structure outlined in this document represents a radical departure from how the agency is structured today. While the INS must move forward rapidly to implement change and demonstrate progress to its critics, it must maintain some degree of stability to permit work to get done on a daily basis. Key to the success of this transformation is the buy-in and support of dedicated professionals in the field. Every effort must be made to retain employees who share the vision for a new INS while working to fundamentally change the way the agency does business. The INS will attempt to minimize disruption to staff and provide challenging opportunities in the new organization.