

CONGRESS

House Appropriations Committee, Subcommittee on Immigration

Chair: Harold Rogers
Ranking Member: Molihan (W.Va.)

House Judiciary Committee, Subcommittee on Immigration

Chair: Lamar Smith
Ranking Member: Mel Watt

Senate Appropriations Committee, Subcommittee on Immigration

Chair: Judd Gregg (N.H.)
Ranking Member: Fritz Hollings (S.C.)

Senate Judiciary Committee, Subcommittee on Immigration

Chair: Abraham (Michigan)
Ranking Member: Kennedy

MOU
Automatic

TRANSMISSION RECORD

IMMIGRATION AND NATURALIZATION SERVICE
HEADQUARTERS
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WASHINGTON, D.C. 20536

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NUMBER OF PAGES (including cover sheet):

COMMENT/MESSAGE:

EL PASO TIMES

APRIL 6, 1998

OUR VIEWS**Restructuring INS****President, Congress should listen to Rep. Reyes**

The congressional debate over the fate of the Immigration and Naturalization Service brimmed with frothy criticism last week but fell short of well-conceived ideas for a feasible reorganization plan.

INS Commissioner Doris Meissner apparently failed to offer a reform plan with real specifics, or at least with enough to satisfy U.S. Rep. Harold Rogers, R-Ky., chairman of the House appropriations subcommittee overseeing the INS budget. Rogers called Meissner's plan "another papered-over reorganization attempt ..." He also labeled the INS dysfunctional, said it can't be fixed and called for abolition of INS for the sake of immigration policy.

On a more diplomatic level, Rep. Silvestre Reyes, D-El Paso, who introduced his own plan in the fall to separate INS's law enforcement efforts, characterized Meissner's plan as "very sketchy."

Reyes wants a complete separation of INS law enforcement efforts (Border Patrol) and its immigrant processing and service work. Meissner proposes an internal split, giving the two branches their own leadership but still maintaining both organizations under the INS umbrella.

Reyes expects Meissner's plan is destined for failure. Judging from Rogers' reaction to it, that seems likely.

Both Reyes and Rogers believe INS's size has led to ineptitude and poor service. "The INS has become

just too big, to the point that it's working against itself," said Reyes, El Paso's former Border Patrol sector chief.

INS has a budget of \$4.2 billion and more law enforcement officers than the FBI. It deported 112,000 of the estimated 4 million undocumented immigrants believed to be in the United States. It's estimated that some 1.5 million people cross the U.S. borders illegally each year.

Reforming INS will be a massive undertaking that will rely to some extent on experimentation. But that extent can be minimized with a well-conceived plan aimed at efficiency. Without doubt, splitting or abolishing INS will be a costly endeavor - as Meissner has warned.

The Clinton administration is aware of Reyes' proposal but had asked the congressman to allow Meissner to submit her plan and consider its merits. The political big wheels would do well to include Reyes - who had 26 years experience in the Border Patrol - in its attempts to reorganize INS. "My interest in this is not for political maneuvering," Reyes added. "My interest is in making INS more effective, efficient and better managed."

That also should be the focus of the president and his administration. The United States is rightfully obligated to protect its borders from illegal immigration and drug smugglers. But taxpayers, too, have a right to insist that it be done as cost-efficiently as possible.



DATE: 4-8-98
PAGE: 11A

Immigration agency reform requires influx of leadership



Today's question on good government: What do you do with a federal agency that has been an ungovernable mess for as long as anyone can remember?

The answer is not to drive a stake through its heart and replace it with the flat tax. For even though tax day approaches like the Grim Reaper, today's topic is not the highly exaggerated failings of the IRS. Instead, this is a column about the perpetually ailing Immigration and Naturalization Service of the Justice Department.

As Doris Meissner, the soft-spoken immigration expert who has been INS commissioner since 1993, put it in an interview this week: "This is an area, immigration, where we're tremendously ambivalent as a country. We've swerved back and forth in the choices that we make. So trying to run an agency that is implementing laws that reflect that kind of ambivalence is naturally difficult."

I had sought out Meissner because, frankly, I was feeling a little guilty. Numbled by the White House scandals, we journalists have lost

sight of the day-to-day business of government, where agencies like the INS struggle on independent of the latest leaks or opinion polls.

But when it comes to affecting the lives of real people, the INS is far more important than the daily damage-control operation in the White House. It matters if you are among the 1 million applicants for citizenship confronted with an average 18-month backlog to have your papers processed. It could be a matter of life and death if you are a Serbian woman, arriving at

Kennedy Airport and dreaming of asylum, haunted by memories of gang rape in your native land.

This is a crucial year for the INS, because there is a growing consensus that the agency cannot function as currently structured. The advisory U.S. Commission on Immigration Reform recommended last year in its final report that the INS should be

abolished. The commission, citing "mission overload," proposed that the INS's law enforcement responsibilities like the Border Patrol should move elsewhere in the

Justice Department, while the agency's more humane activities like granting citizenship should be handed over to the State and Labor departments.

Kentucky Republican Harold Rogers, who chairs the House appropriations subcommittee that oversees the agency, has become a militant advocate of the kill-it-now approach to the INS. Rogers called me Tuesday afternoon from a Tarmac in Ecuador, where he was stopping as part of a congressional delegation investigating drug enforcement.

"The INS' mission is too schizophrenic and too large for any single agency," Rogers said. "In my 14 years on the subcommittee, I've seen three administrations try to reform the INS. But the agency doesn't respond. Its field offices are autonomous and laws unto themselves."

Few Republicans have endorsed abolishing the agency. A more temperate view comes from Michigan's Spencer Abraham, who chairs a Senate subcommittee on immigration. Talking by car phone as he drove his family to Disney World during the

congressional recess, Abraham said: "I have wondered whether the structure of the INS is well-designed. It's hard to be a good cop as a service provider and a bad cop in the form of enforcement by the Border Patrol."

Abraham still has an open mind

about whether these functions should reside in the same agency. But, he said: "Something is going to happen here one way or another. Either there's going to be a reorganization or an improvement in the delivery of services. There's been an angry drumbeat of problems."

The Clinton team, to its credit, recognizes the need for change. Drawing on a management study by Booz-Allen & Hamilton, the administration recently proposed revamping the lines of authority within INS. As policy-makers stated in a letter to Rogers, the goal is to "untangle the INS' overlapping and confusing organizational structure and replace it with two clear organizational chains of command: one to accomplish its enforcement mission and the other to provide immigration-related services."

Meissner is a persuasive advocate of rebuilding the INS from within. "This is fundamental reform," she said. "This is not moving boxes around on a chart. This is entirely changing the way we do business."



Politics

By Walter Shapiro

cont'd

Outside observers of the INS portray Meisner as a decent and committed woman trapped in an impossible system. Even after nearly five years on the job, Meisner is still confronted with autonomous fiefdoms in the INS regional offices that operate on the principle that commissioners come and go but the bureaucracy is forever. The unspoken argument in favor of the administration plan is that it will transform the bureaucratic culture in these hidebound offices.

But the INS cannot be reformed by fiat. Any restructuring depends on legislative approval from a Republican Congress with a proven weakness for punitive approaches to illegal immigration. To surmount GOP resistance will require leadership from a distracted and risk-adverse president. So, even when it comes to good government, all arrows point back to the White House.

Walter Shapiro's column appears Wednesdays and Fridays. Past columns on USA TODAY Online at www.usatoday.com

RESTRUCTURING STEPS

WORK SUBSTANTIVE ISSUES W/WH, DOJ

- 6c and OT coverage**

WORK WITH BOOZ ALLEN

- recompet 6-month contract**
- identify cost of contract**
- clarify what happens between contracts/
which team carries on**
- clarify work of Booz for next 3 wks**

Mary Ann-JMD

DM

DM talk to Mather

WRITE LEGISLATION

**clarify who needs to review
and at what stages**

**General Counsel
and Management
(Peter Gregory
& Cathy Cash)
drafting by 4/17
to JMD/OMB
to Hill by 5/1**

DM talk to Colgate

INITIATE STEPS NON-RELATED TO NEW STRUCTURE

work with Labor Dept

Julie F/DPC

INTERNAL FOLLOW UP

- report back from field on how talks with staff went Field Ops
- DM meets with DD Assn. April 14
- set up on-going field consultative group
- Progress Report to All Staff when legis. intro

HILL OUTREACH

- Who is introducing legislation-Watt/Kennedy
- Set up Judiciary Subcommittee hearings May? AE
- WH Follow up with Reyes AE-Murgia
- AG lunch with Reyes post 4/21
- AG visits to Gregg & Rogers post 4/21
- WH Follow up with Mollohan? AE-Jacoby
- Hispanic Caucus Follow Up DM-Becerra/Gut,
- Schedule Follow up Mtg. W/Caucus AE
- Outreach to Asian and Black Caucuses?
- Set up DM Meetings Abraham and Kennedy AE
- Rogers Approps Mark up May/June

WORK WITH GROUPS

- materials sent to groups 4/2
- Stay in touch with Working Group JA to contact AILA
- work on getting endorsements
- determine who to work with in
- law enforcement community Barbara Huie?
- (Sherriff's Assn., IACP)

WORK WITH INTERGOVERNMENTAL ENTITIES

- Mayor Giuliani done
- Riordan
- NGA
- US Conf of Mayors

CREATE NEW MATERIALS FOR MEDIA, HILL AND CBO'S

- explanation of how this changes **OPA**
service side. Now vs. Future
- how this changes enforcement - dalton, e.g.

CONDUCT HISPANIC PRESS OUTREACH

Univision (Lunch?)

La Opinion ed board, article

CONDUCT OUTREACH TO OPINIONMAKERS

USA Today Columnist Walter Shapiro

Ed Boards

- Wash Post (JA sent materials, Rosenfeld did not indicate interest)
 - New York Times (EA sent materials,
 - New York Daily News
 - USA Today (no interest)
 - LA Times
 - San Diego Union Tribune – JA sent to Jim Gogek, will follow up
 - Miami Herald
 - El Paso
 - Detroit Free Press
 - Detroit News
 - Dallas Morning News
 - Austin Statesman
 - San Antonio Express News
 - Tennessean
 - Christian Sci Monitor
- any other paper that did anti-CIR editorial

CALENDAR/DEADLINES**4/6****DM outreach to Becerra
Gutteriez****outreach to editorial writers
outreach to groups****get feedback from field****4/17****get draft legislation to JMD****4/21****Congress back****end of April****Booz Contract ends****MAY****5/1****circulate leg on Hill****subcommittee hearings**

OTHER EFFORTS**CUSTOMER SERVICE INITIATIVE**

Appoint Commissioner's Special Advisor on Customer Service

Fund changes to waiting rooms, signage, etc.

Bring Customer Svc. Training to District I.I.O's after work

NATZ FIXES

- senior players at top (bratt coming back)

- EDS problems

- records centralization money

Media: federal page or pam constable story on fixes

fact sheet to customers on fixes

BORDER PROGRESS

- analysis of Rio Grande

- help for Arizona

INTERIOR ENFORCEMENT PLAN

TRANSMISSION RECORD

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COMMENT/MESSAGE:

EL HERALDO YELLOW PAGES HOMEHUNTER CARLINTER NEWSLEADER NEWSFOUND JOEHUNTER
MIAMI.COM

The Miami Herald

Published: Sunday, April 5, 1998

Section: Editorial

Page: 2L

GIVE INS A CHANCE

Herald Staff

Yes, the U.S. Immigration and Naturalization Service has much to improve. No, it should not be dismantled, its duties carved up and parceled out to other federal bureaucracies with even less skill at keeping the unlawful out of the country and providing vital immigration benefits to those entitled.

Fortunately, the Clinton administration has offered a promising alternative. Rather than get rid of the INS altogether, as a federal advisory panel recommended last fall, the administration proposes a sweeping restructuring of the 107-year-old agency. It aims to improve the INS's effectiveness, efficiency, accountability, and service.

The proposal calls for separating the INS's law-enforcement and service functions while keeping both within the same agency to promote critical coordination, information-sharing, and administrative support. The plan envisions immigration-service centers "with clear signs, comfortable waiting rooms, evening and weekend hours"; national standards for timely services; and shared electronic records. Refreshing.

There are concerns. While in different chains of command, enforcement and service personnel both will have to be sensitive to each other's missions. No INS inspector at entry points such as Miami International Airport should feel free to mistreat visitors, the majority of whom arrive legally as tourists or on business. Equally, service officers need to channel naturalization applicants who are aggravated felons into deportation channels.

Overall, the administration offers a rational plan for coping with what will remain complicated immigration challenges. Certainly it's light years ahead of calls to abolish the INS and, for example, put the State Department in charge of naturalizations. That's an easy out for those who would be happy to see no immigrants entering this great nation.

Yet no INS restructuring, logical and radical might it be, will cure all the nation's immigration woes overnight. Though most would agree that the current INS system desperately needs fixing, part of the problem is that many -- including congressional lawmakers -- disagree about what needs to be fixed. Worse, the INS has had to implement the complicated, conflicting, and fundamentally unfair immigration provisions that Congress passed and President Clinton signed in recent years.

No wonder the INS can't please anyone. No amount of tweaking the INS will fix what's wrong with harsh, retroactive laws that strip immigrants of rights to judicial review.

U.S. DEPARTMENT OF LABOR

SECRETARY OF LABOR
WASHINGTON, D.C.

MAR 31 1998

The Honorable Harold Rogers
Chairman, Subcommittee on the Departments of Commerce,
Justice, State, the Judiciary, and Related Agencies
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

The Department of Labor was pleased to participate in the review led by the Domestic Policy Council (DPC) of the recommendations of the Commission on Immigration Reform (CIR) and in the development of this restructuring plan for the Immigration and Naturalization Service (INS).

The Department endorses this reform strategy and believes it represents the most effective way to achieve long-term and lasting improvements in Federal immigration policy formulation and execution. The restructuring plan fosters clear lines of authority and responsibility in immigration enforcement and service operations which will promote better communication and coordination between the INS and the Department.

The CIR recommended shifting the enforcement of immigration-related employment standards from the INS to the Department of Labor - which already has most of this responsibility. However, we believe that improved coordination between the two agencies and more effective and mission-sensitive Departmental involvement in worksite enforcement of immigration-related labor standards are the best way to achieve the results the CIR seeks. Under the leadership of the DPC, INS and DOL staff are developing plans to achieve more effective worksite enforcement consistent with the two agencies respective missions. In addition, the Department is currently evaluating other reforms, such as restructuring its internal immigration activities, that offer promise for significant streamlining and improvement of Departmental processes. We will continue to explore ideas to improve the Department's administration of our own enforcement and service responsibilities.

The Department will continue to participate in the INS restructuring initiative to ensure a coordinated and carefully crafted policy that improves the Nation's immigration system and serves all our people, especially U.S. workers and their families.

The Office of Management and Budget advises that there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexis M. Herman". The signature is fluid and cursive, with the first name "Alexis" being more prominent.

Alexis M. Herman

**THE SECRETARY OF STATE
WASHINGTON**

March 31, 1998

Dear Mr. Chairman:

The Department of State is committed to an immigration system that serves the best interests of the American people as well as legal immigrants, foreign visitors and those who may seek citizenship. The Department supports the Administration's proposals to reorganize the Immigration and Naturalization Service to better fulfill its dual mandate of providing services to legitimate applicants and enforcing U.S. immigration laws. The Department will continue to work with INS to minimize any duplication in our shared responsibility for the admission of aliens to the United States and to expand cooperative information-sharing initiatives like the State/INS DATASHARE project.

The Department has met with the Domestic Policy Council to review the recommendations of the Commission on Immigration Reform (CIR). The CIR proposal to transfer INS' service and benefit responsibilities to the Department would require taking on new functions that entail a substantial workload increase. Moreover, such a transfer would occur at a time when Congress is also considering a consolidation of other agencies with the Department. We believe the Administration's efforts can achieve the same goals that the CIR sought without the disruption and risk inherent in dismantling an organization like the INS.

We want to continue to work with you and the Subcommittee toward our common goal of an immigration system that serves the needs of the nation by welcoming legal immigrants, effectively deterring those who attempt to enter illegally, and providing services and benefits in a timely and effective manner.

The Honorable

Harold Rogers, Chairman,

Subcommittee on Commerce, Justice,

State, the Judiciary, and Related Agencies,

Committee on Appropriations,

House of Representatives.

-2-

The Office of Management and Budget advises that there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

A handwritten signature in dark ink, appearing to read "Madeleine Albright", with a stylized flourish at the end.

Madeleine K. Albright

THE WHITE HOUSE

WASHINGTON

March 30, 1998

The Honorable Harold Rogers
Chairman
Subcommittee on Commerce, Justice, State,
and the Judiciary
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

For the last several years, the Administration and Congress have shared the goal of significantly strengthening the Nation's immigration system. While the Immigration and Naturalization Service (INS) has made important progress, the Administration recognizes that the recent changes in the breadth and scope of the agency's mission require a rethinking of its structure.

In its report accompanying P.L. 105-119, the House Appropriations Committee directed the Attorney General to review the recommendations of the Commission on Immigration Reform (CIR) and develop a plan that would result in greater effectiveness and efficiency in the performance of the core functions of the Federal immigration system. The President, also responding to the CIR report, asked the Domestic Policy Council (DPC) to "evaluate carefully the [CIR] proposal and other reform options designed to improve the executive branch's administration of the Nation's immigration laws." In conducting this review, the DPC, working closely with the Office of Management and Budget, consulted with the Departments of Justice, Labor, and State, the INS, staff of the CIR, immigration experts and advocacy groups, and other White House offices, including the National Security Council.

The Administration review concluded that the CIR report correctly diagnosed many of INS' longstanding problems -- insufficient accountability between field offices and headquarters, competing priorities within field offices, lack of consistency, a need for greater professionalism, overlapping organizational relationships, and significant management weaknesses. These problems have hampered the ability of the INS to more effectively pursue the principal tasks that Congress and the Administration expect the INS to perform: effective enforcement of our immigration laws both at our borders and in the interior and the efficient provision of immigration and citizenship services. Improving the ability of the INS to pursue these critical priorities must be the guiding principle of any reform plan.

After careful consideration and study, we have concluded that the most effective way to adhere to this guiding principle is to implement dramatic and fundamental reforms *within* the INS. The Administration's reform plan will untangle the INS' overlapping and confusing organizational structure and replace it with two clear organizational chains of command — one to accomplish its enforcement mission and the other to provide immigration-related services. By retaining both of these functions within a single agency, the Administration's reform plan will ensure that both the enforcement and service operations are appropriately coordinated and supported by headquarters. The Administration's reform plan will strengthen accountability and improve efficiency and effectiveness by allowing each of the two chains of command to focus on its unique requirements.

The key features of the Administration's plan are to:

- Effect an operational split between enforcement and services, resulting in two distinct, clear lines of authority from the field to headquarters, with an INS Commissioner continuing to be responsible for overall agency operations.
- Eliminate the current field structure in which district offices serve both enforcement and service functions, and replace it with separate enforcement and service offices that bring the right mix of staff and skills to local service caseloads and enforcement needs.
- Improve the quality of the workforce by creating separate enforcement and service career paths for INS employees, so that the best employees can move up the ladder and be rewarded for high performance.
- Restructure management operations to ensure an effective "shared support" operation (e.g., records and data management, technological support, employee relations, and administrative support) that will serve both the enforcement and the service sides of the agency.
- Establish a Chief Financial Officer to improve financial, accounting, and budget execution systems.

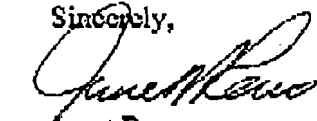
In addition to implementing the restructuring plan noted above, the Administration will continue its efforts to identify and take appropriate remedial action to eliminate any remaining areas of duplication or inadequate coordination between the INS and the Departments of Labor and State.

During its review, the Administration carefully evaluated the CIR recommendations. The CIR concluded that the INS' dual responsibility of welcoming legal immigrants and deterring illegal immigration has resulted in "mission overload." To address this issue, the CIR recommended disbanding the INS and reallocating its primary responsibilities to the Departments of Justice, State and Labor. We believe those recommendations would only compound the current problems with the Nation's immigration system.

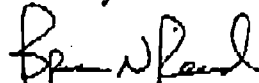
First and most important, this reallocation would hinder the coordination and communication necessary to maintain the integrity and efficiency of both immigration enforcement and immigration service operations. To be most effective, all immigration policy and management should remain within one agency at the Justice Department. Second, such a substantial reallocation of authority could require a lengthy transition, exacerbating existing concerns about long delays in immigration activities.

The Administration's plan is a fundamental change in the way the INS conducts business. The restructuring -- from top to bottom -- will address long-standing concerns about lines of authority and responsibility, consistency of policies and procedures, and performance within the INS. It will result in improved enforcement coordination, career paths that support greater professionalism, and measurable changes in the way INS provides services to the immigration community. Most important, it will greatly improve the ability of the INS to effectively and efficiently perform its duties. We look forward to working with you and other members of Congress to implement this restructuring plan and to ensure successful, long-term improvements in the Nation's immigration system.

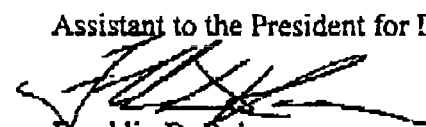
Sincerely,



Janet Reno
Attorney General



Bruce N. Reed
Assistant to the President for Domestic Policy



Franklin D. Raines
Director
Office of Management and Budget

Enclosures

Identical Letters Sent To:

**The Honorable Spencer Abraham
The Honorable Judd Gregg
The Honorable Ernest Hollings
The Honorable Edward Kennedy
The Honorable Alan Mollohan
The Honorable Lamar Smith
The Honorable Melvin Watt**

A FRAMEWORK FOR CHANGE: The Immigration and Naturalization Service

Background

America has always been a nation of immigrants, and this Administration is proud of the significant progress we have made toward improving this Nation's immigration system. Over the last five years, the INS has worked hard to curtail illegal immigration through tougher border control, reform of a badly abused asylum system, and removing record numbers of criminal and other illegal aliens. The agency has also worked to redesign and strengthen the naturalization process. While the INS has made important progress, the Administration recognizes that the recent changes in the breadth and scope of the agency's mission require a rethinking of its structure.

In its final report to Congress last fall, the Commission on Immigration Reform (CIR) called for significant reform to our Nation's immigration system. The major thrust of the CIR's proposed reform would move many immigration functions to the Department of State and Labor and would consolidate all immigration enforcement into a new Federal law enforcement agency within the Department of Justice.

In response to the CIR's recommendations, the President asked the Domestic Policy Council (DPC) to "evaluate carefully the [CIR] proposal and other reform options designed to improve the executive branch's administration of the Nation's immigration laws." In conducting this review, the DPC, working closely with the Office of Management and Budget, consulted with the Departments of Justice, Labor, and State, CIR staff, immigration experts and advocacy groups, and other White House offices, including the National Security Council. This review examined organizational and restructuring options including those formulated by the CIR and members of Congress. From this effort, the Administration established a new framework for reform, and the Justice Department contracted with a management consulting firm to provide an independent assessment of structural options and assist in making the Administration's framework "operational."

The Administration's Framework for Change

The DPC review process concluded that the CIR report correctly diagnosed many of INS' longstanding problems -- insufficient accountability between field offices and headquarters, lack of consistency, need for greater professionalism, overlapping organizational relationships, and significant management weaknesses. These problems have hampered the INS' ability to effectively enforce our immigration laws both at our borders and in the interior, and efficiently provide immigration and citizenship services. Improving the ability of the INS to pursue these critical priorities must be the goal of any reform plan.

After careful consideration and study, the Administration concluded that the most effective way to achieve this goal is to implement dramatic and fundamental reforms *within* the INS. The Administration's reform plan untangles INS' overlapping and frequently confusing organizational structure and replaces it with two clear organizational chains of command -- one for accomplishing its enforcement mission and one for providing services. Each operation would be headed by an Executive Associate Commissioner (EAC) who would report directly to the Commissioner through the Deputy Commissioner.

The plan will eliminate the current field structure in which regional district offices serve both enforcement and service functions and will replace it with separate enforcement and service offices that bring the right mix of staff and skills to local service caseload and enforcement needs. The result will be an INS organization with strengthened accountability and improved efficiency and effectiveness. The plan will allow each operation to focus its unique knowledge, skills, and abilities, while also retaining the essential integration functions needed to coordinate these operations.

Improved Customer-Oriented Services

- **Creates new local service offices.** The new immigration services operation would locate new service offices in immigrant communities around the country. These offices would focus on providing efficient and effective service, while maintaining the integrity of application processing. The offices would provide a range of services including: providing information to applicants, taking fingerprints and photographs, testing, and interviewing. Depending on community needs, some offices would be configured as full-service centers and others could serve as satellite locations to perform specific functions. These new service facilities would have a standard "look and feel" with clear signs, comfortable waiting rooms, evening and weekend hours, and other customer-friendly features.
- **Establishes accountability and clear lines of authority.** The heads of the local service offices would report to an Area Service Director. The Area Service Director would report directly to the Executive Associate Commissioner for Immigration Services. Area Service Directors would have the flexibility to move case processing responsibilities among offices within their area to maximize efficiency.
- **Establishes clear standards for customer service.** The Area Service Directors would be held accountable for meeting a nationally-established standard for timely processing and courteous service at all locations throughout the area.

- **Offers high-tech answers.** This new framework provides high-tech ways for people to receive better service through remote service centers. As part of this restructuring effort, INS will re-examine the capabilities of the four service centers that handle the automated, bulk processing workload of the current district offices. These centers currently take applications, create electronic records of them, and conduct the pre-processing necessary before an examination is administered. Under the new structure, more work would be shifted to the service centers, thus allowing local offices to focus on core activities which require interaction with customers. In addition, the capabilities of the centralized phone centers which will provide information to applicants and the public will also be examined.

A Strengthened and Integrated Enforcement Operation

- **Establishing a single, coordinated enforcement function.** The plan creates an operational chain of command dedicated solely to immigration enforcement, focuses comprehensively on illegal immigration problems at the border, and establishes better linkages with interior enforcement through a single point of accountability for performance. This approach would strengthen professionalism and improve results. This structure also would ensure priorities are shared and allow close coordination of day-to-day operations among each enforcement discipline.
- **Integrating enforcement and strengthening accountability.** The new enforcement operations areas would combine all functions related to the enforcement of immigration laws. Each enforcement area would be organized according to four functions, and led by a single director. The Area Enforcement Director would report directly to the Executive Associate Commissioner for Enforcement.
- **Organizing enforcement areas by function.** The enforcement areas would be organized around four functional goals: managing the border; inspections and management at ports of entry; investigations and removals; and detention.
 - 1) **Border Patrol.** The Border Patrol would perform its current border management functions of deterring illegal immigration, apprehending illegal aliens, and working to dismantle smuggling rings.
 - 2) **Inspectors.** By putting inspectors in the enforcement chain of command, the plan recognizes the critical role that ports of entry play in INS' border management strategy. This would give the ports a stronger role in the enforcement side of the agency and inspectors a direct reporting relationship to the Area Enforcement Director.

3) Investigations and Removals. This plan would also bring investigators, intelligence officers, and deportation officers into one multi-disciplinary component to focus on removals and the pursuit of fraud, smuggling, and illegal employment at the workplace. Offices in the field would be located in areas with the greatest demand for those functions -- similar to the traditional Special or Resident Agent-in-Charge (SAC/RAC) law enforcement model used by the FBI.

4) Detention and Enforcement Support. This framework would improve the logistical coordination of transporting criminal and illegal aliens and detaining them in long-term facilities by centralizing the current district office detention and transportation operations. Under the new framework, this component would be better able to manage open bed space at INS and contract facilities and improve and monitor conditions at these facilities.

Shared Support

- **Providing the right tools.** The “shared support” operation (e.g., records and data management, technological support, employee relations, and administrative support) would serve as the administrative and technological backbone upon which both enforcement and service operations depend under the new framework. Under this new structural framework each side of the agency has the appropriate administrative and technological tools to do its jobs in the most efficient and cost-effective way. These would range from new computer software systems that are “user-friendly” for enforcement agents and service officers, to appropriate training to strengthen professionalism.
- **Improving accountability.** Under this restructuring plan the shared support function will be held accountable for meeting the needs of the enforcement and service operations in a timely and effective manner.
- **Managing essential records.** An important cohesive function of the shared support operation is the management of all of INS’ files and electronic databases. INS’ records are the foundation of its work -- whether in law enforcement or the provision of services to its customers. For example, the information contained in those records tells an INS deportation officer that an individual has overstayed his visa and the last address at which he might be found. It also tells an adjudicator whether a person has ever entered without inspection, therefore jeopardizing the alien's eligibility to become a legal permanent resident.

New "Strategy" Office

- **Setting priorities and assessing results.** The Administration's proposed structure includes the creation of a small, new "strategy" unit that would focus on setting priorities, long-range strategic planning, and policy development, as well as analyzing the effectiveness of their implementation. The unit would draw heavily on staff from headquarters and the field, as well as create subject area task forces to draw on the expertise of individuals accountable for each program.

New Chief Financial Officer Role

- **Enhancing accountability and efficiency.** The new structure establishes a Chief Financial Officer to ensure effective allocation, control, and monitoring of the agency's finances. This would enhance accountability for managing the agency's resources and ensure that immigrant services and enforcement have clearly separated and defined resource streams.

Other Management Improvements

INS recognizes that a fundamental restructuring is only one aspect of improving its ability to build a more effective organization. As part of its reform efforts, the agency also is planning management initiatives such as fundamentally redesigning outdated business processes and the creation of new training opportunities for employees.

Conclusion

Preserving our country's tradition as a Nation of laws and a Nation of immigrants requires one agency with clearly defined operational lines of authority and accountability. This new structure will allow our Nation to better control its borders and provide improved service and benefits to the immigrant community. The Administration's plan is a bold initiative to strengthen the INS' capacity to accomplish this critical mission.

***Restructuring and Reform of the Immigration and Naturalization Service (INS)
Comparison of the Administration and Commission on Immigration Reform (CIR) Proposals***

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
<i>Immigration Enforcement:</i> Places responsibility for immigration enforcement at the border and in the interior of the U.S. in a new Bureau for Immigration Enforcement at the Department of Justice (DOJ).	Within the INS an Executive Associate Commissioner (EAC) for Enforcement Operations will be established with line responsibilities for all enforcement functions (Border Patrol, inspections, investigations, detention, and intelligence) reporting directly to the INS Deputy Commissioner/Commissioner. This functional split between enforcement and service operations extends from the field right to headquarters.	Consolidates border and interior enforcement into a single enforcement unit, while preserving integration/synergy between enforcement and service functions by keeping them within the INS. Establishes clear lines of authority and divisions of responsibility between these two operations. Maintains a single immigration focal point within the Department of Justice.
Bureau Director appointed for a set term (5-years).	INS Commissioner remains a Presidential appointee with no set term.	Ensures agency-head has the confidence of the Attorney General and President.
Bureau personnel should be upgraded to receive law enforcement pay and benefits commensurate with those of other DOJ law enforcement components.	The INS is reviewing pay options to ensure law enforcement officers, with similar duties, receive comparable pay and benefits.	The study will provide a clear assessment of pay disparities between enforcement agents performing similar tasks and provide guidance to promote increased professionalism and positive morale.
Establish a Uniformed Service Enforcement Branch that merges INS Inspectors, Border Patrol and detention offices into one uniformed service. Investigations/intelligence would constitute a "white-collar" division within this new bureau.	Consolidates all enforcement functions under area enforcement directors, but maintains distinct functions of Border Patrol agents, inspectors, investigators, and detention officers.	Union representatives and affected employees will be involved in the development of any pay reform proposal, which will require legislation and a phased implementation process. The Administration is also studying options for common entry level training and career paths for enforcement officers.
All uniformed officers (Border Patrol, inspections, and detention) within a particular geographic area would be under the authority of a single integrated enforcement manager.	All functional enforcement operations (Border Patrol, inspections, investigations, detention, and intelligence) will be consolidated into enforcement units under a single chain of command and report to an area enforcement director and EAC for Enforcement Operations.	Provides a single point of responsibility and accountability for enforcement operations and allows the agency to focus on integrated enforcement on a national or global scale. This approach is similar to a traditional law enforcement organizational model.
Establish a "Removal Officer" position that integrates the functions of investigations and deportation.	Investigations and deportation officers will be merged into an investigation and removal unit under an area enforcement director. The merits of merging the two occupational series are still under consideration.	Close coordination, oversight, and management will ensure the best use of this staff to expedite the removal of illegal aliens.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Field offices structured to address comprehensively the immigration enforcement challenges within that locality.	In place of the current district office structure, the plan consolidates all enforcement operations under an area enforcement director. The area enforcement director will report directly to the EAC for Enforcement Operations. Border Patrol agents will report to Border Patrol chiefs; inspectors will report to port-of-entry directors. These enforcement officers, along with investigation and removal personnel, will report to an area enforcement director who coordinates enforcement activities within a geographic area.	Creates an unambiguous enforcement chain of command with well-defined reporting relationships and a manageable span of control.
Regional offices would be retained for administrative and management oversight of field office operations.	Regional offices will be restructured to be operational rather than administrative. Instead of three regional offices, the plan creates geographic enforcement areas. Each area enforcement director will report directly to the EAC for Enforcement Operations.	Provides direct operational oversight of enforcement activities to better achieve coordination and execution of enforcement priorities.
<i>Immigration Services:</i> Adjudication of eligibility for immigration-related applications (immigrant, limited duration admissions, asylum, refugee, and naturalization) in the Department of State under the jurisdiction of a new Undersecretary for Citizenship, Immigration, and Refugee Admissions.	Within the INS an Executive Associate Commissioner (EAC) for Immigrant Services will be established consisting of all immigrant benefit and service functions reporting directly to the INS Deputy Commissioner/Commissioner. This functional split between immigrant service and enforcement operations extends from the field to headquarters.	Establishes a single immigration service organization but preserves integration/synergy between enforcement and service functions by keeping them within the INS. Establishes clear lines of authority and divisions of responsibility between these two operations. Maintains a single immigration focal point within the DOJ.
Establish a Bureau of Immigration Affairs at the Department of State to manage the immigration process including domestic adjudication/examination (work authorization/adjustment of status) and employment verification.	Naturalization functions included within a restructured EAC for Immigration Services.	Immigration enforcement responsibilities are integral to the benefit review and adjudication process. Neither mission can be conducted effectively if placed in separate agencies. Both enforcement and service operations enforce the same law (Immigration and Nationality Act) and consistent outcomes, require common processes, data collection, and employee cross-training.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Establish a Bureau of Refugee Admissions and Asylum Affairs at the Department of State responsible for overseas refugee admissions and refugee and asylum functions conducted by the INS.	Functions included within a restructured EAC for Immigration Services.	Same as above. INS and State will initiate an operational review to minimize overlap and duplication within INS and State-run visa, refugee, and asylum programs.
Establish a Bureau of Citizenship and Passport Affairs at the Department of State responsible for naturalization and determinations of citizenship and passport issuance.	Functions included within a restructured EAC for Immigration Services.	The State Department is not equipped to conduct the service and enforcement processes required in the naturalization program. Moreover, this reallocation of functions to State may conflict with its foreign policy mission. The naturalization redesign addressed the concerns raised by the CIR while retaining this responsibility within the INS.
Establish Quality Assurance Officers to oversee records management, procedure monitoring, fraud investigations, and internal review.	INS has expanded its INSpect program to assist in internal review and audits. The EAC for Immigration Services will establish an office to monitor and ensure quality service, benefit processes, products, and operations.	The naturalization redesign has established quality assurance checks throughout the process. The redesign incorporates sweeping changes in processes, records management, data flow and retention, and customer service as measures of integrity.
Establish a field structure that uses existing INS Regional Service Centers and State's National Visa Center and create a local office structure that is separate from immigration enforcement offices.	Local service offices will move from the current district office configuration to a community-based operation modeled on immigrant population density data. Service offices will not necessarily be located in the same location as enforcement operations. The EAC for Immigration Services will also rely heavily on direct mail to existing INS service centers.	The naturalization redesign study has recommended direct-mail to service centers for benefit processing and INS is implementing these recommendations. Beginning April 15 all naturalization processing will be direct-mail and phased implementation of direct mail processing for all other benefit applications is planned for completion over the next two years.
<i>Immigration-related Functions:</i> Consolidate enforcement of immigration-related employment standards in the Department of Labor.	Enforcement of immigration-related labor and employment standards will be shared between the Department of Labor (DOL) and INS. DOL and INS will develop an MOU to improve coordination and promote more effective worksite enforcement and worker protection.	Will provide a mechanism for more effective enforcement of immigration-related labor laws.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
All worksite investigations to ascertain employers' compliance with employment eligibility verification requirements should be conducted by the Department of Labor.	The authority to verify compliance for violations of employment eligibility will be shared between INS and DOL. The Administration is studying options for more effective DOL involvement in worksite enforcement of immigration-related labor standards.	Will provide a mechanism for the more effective enforcement of employment verification requirements.
Upon the adoption of an expedited process for the admission of both immigrant and temporary workers, DOL should be given responsibility and resources for enhanced monitoring of employers' fulfillment of the attestation terms they filed to bring in workers.	DOJ and DOL will work together to develop reforms to the current immigration-related employment programs to streamline the certification process and strengthen employer monitoring.	DOL is evaluating its immigration structure in order to streamline the current processes while ensuring labor protections. With sufficient delegation of authority from DOJ, DOL will further streamline the certification process and increase its enforcement of employer obligations.
<i>Administrative Review:</i> Administrative review of all immigration-related decisions should be consolidated and considered by a newly-created independent agency, the Agency for Immigration Review.	Maintains the current review and appeals mechanism.	The Administration is studying options to consolidate some review and appeals functions currently in the INS and DOL into the Executive Office of Immigration Review under the Attorney General.
Organization headed by a Presidentially appointed Director with no say in the substantive decisions reached on cases considered by any division or component of the agency.	Maintains the existing Department-head appeal process/final decision.	Placement of the adjudication process within a Department ensures executive oversight of administrative appeals and uniform and consistent national immigration policy.
<i>Agency-wide Reforms:</i> The Commission urges the Federal Government to make needed reforms to improve management of the immigration system.	Significant management improvements have been accomplished at INS over the past five years. This restructuring plan addresses a number of management and process weaknesses that remain within INS.	INS has accomplished major management, system, and process improvements in the face of a highly visible and growing mandate, large increases in resources and staffing, and unceasing historic demands for immigrant services.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Set more manageable and fully-funded priorities (realistically-achievable short and long-term goals and greater numerical specificity on expected annual outcomes to which agencies should be accountable).	The INS has developed strategic performance plans and measures in both enforcement and service operations. We believe that these plans and measures are manageable and will accurately capture agency performance. As measures are refined, annual outcomes can help judge performance and highlight strengths and weaknesses that require management attention.	INS' FY 1999 Budget justification provides measurable performance goals in enforcement and service operations. The goal is result-oriented performance measures that allow management to judge performance in the aggregate and provide line-managers with the data necessary to do their job effectively.
More fully develop the capacity for policy development, planning, monitoring, and evaluation. Domestic Policy Council (DPC) responsible for overseeing Federal immigration policy development.	The Administration plan will consolidate long-term immigration planning within its strategic planning office reporting to the Commissioner. This group will coordinate agency-wide policy development. The DPC has established a policy-level group that includes immigration-related agencies and Executive Office of the President staff. This group looks at short and long-term immigration policy issues and concerns and coordinates the development of the Administration's position on immigration matters.	Will improve Government-wide immigration policy development and oversight.
Improve systems of accountability and measures of performance.	The key feature of this restructuring plan is to build clear lines of responsibility and accountability within the INS. The restructuring will ensure that line managers have the necessary tools to do the job effectively and performance can be measured. Current confusing and overlapping organizational relationships will be eliminated and replaced with clear lines of command in enforcement, services, and within the administrative support functions -- vital to INS' operational effectiveness.	Much of the work INS performs requires close coordination between enforcement and services. Under this restructuring coordination is maintained while reporting relationships remain clear so that policy can be developed, coordinated, and applied consistently.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Improve the recruiting and training of managers. Expand the ranks of skilled and properly trained supervisors and managers.	INS has consolidated its recruitment effort to ensure consistency and quality and has emphasized the importance of basic, advanced, and management training. Training is a core element of the Commissioner's professionalism initiative. Performance in meeting training goals is measured by INS and DOJ. INS has sought to infuse new skills and thinking by hiring from both public and private sectors.	Consolidated and consistent recruiting has been achieved by establishing a central operation in Minneapolis, MN for hiring. Similarly, INS has established a management training facility in Dallas, TX, and equipped the Border Patrol training facility in Charleston, S.C. In concert with the establishment of these facilities is the creation of advanced and management training modules for enforcement, service, and professional staff.
Strengthen the customer service orientation. Establish a separate career track for benefit and service operation employees.	This restructure establishes separate career paths for enforcement and service personnel.	Lack of a clear career paths for enforcement and service personnel means INS often loses its best employees. By creating a separate career path for enforcement and service operations, this restructuring will increase retention and, therefore improve overall morale.
Use fees for immigration services more effectively. Fees should reflect true costs, cover the costs of services provided, result in timely and courteous service, and provide flexibility in their use to meet changing service requirements and demands.	This restructuring, combined with the naturalization redesign, should address this concern. INS completed an activity-based-costing (ABC) review of its benefit fee structure which has resulted in a proposed fee increase that accurately estimates the cost of providing benefits. INS will begin to conduct a "base" funding examination of its fee structure in FY 1998 to ensure benefit and service fee receipts support service-related operations. The establishment of a Chief Financial Officer within INS, combining budget and financial operations, will also strengthen its ability to manage appropriated and fee-receipt funds.	Fees should reflect true costs, cover the costs of services provided, result in timely and courteous service, and provide flexibility in their use to meet changing service requirements and demands. The base funding review of its fee structure and the ABC review should help assure all interested parties that fees reflect true costs and that they support fee services.

THE WHITE HOUSE

WASHINGTON

March 30, 1998

The Honorable Harold Rogers
Chairman
Subcommittee on Commerce, Justice, State,
and the Judiciary
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

For the last several years, the Administration and Congress have shared the goal of significantly strengthening the Nation's immigration system. While the Immigration and Naturalization Service (INS) has made important progress, the Administration recognizes that the recent changes in the breadth and scope of the agency's mission require a rethinking of its structure.

In its report accompanying P.L. 105-119, the House Appropriations Committee directed the Attorney General to review the recommendations of the Commission on Immigration Reform (CIR) and develop a plan that would result in greater effectiveness and efficiency in the performance of the core functions of the Federal immigration system. The President, also responding to the CIR report, asked the Domestic Policy Council (DPC) to "evaluate carefully the [CIR] proposal and other reform options designed to improve the executive branch's administration of the Nation's immigration laws." In conducting this review, the DPC, working closely with the Office of Management and Budget, consulted with the Departments of Justice, Labor, and State, the INS, staff of the CIR, immigration experts and advocacy groups, and other White House offices, including the National Security Council.

The Administration review concluded that the CIR report correctly diagnosed many of INS' longstanding problems -- insufficient accountability between field offices and headquarters, competing priorities within field offices, lack of consistency, a need for greater professionalism, overlapping organizational relationships, and significant management weaknesses. These problems have hampered the ability of the INS to more effectively pursue the principal tasks that Congress and the Administration expect the INS to perform: effective enforcement of our immigration laws both at our borders and in the interior and the efficient provision of immigration and citizenship services. Improving the ability of the INS to pursue these critical priorities must be the guiding principle of any reform plan.

After careful consideration and study, we have concluded that the most effective way to adhere to this guiding principle is to implement dramatic and fundamental reforms *within* the INS. The Administration's reform plan will untangle the INS' overlapping and confusing organizational structure and replace it with two clear organizational chains of command — one to accomplish its enforcement mission and the other to provide immigration-related services. By retaining both of these functions within a single agency, the Administration's reform plan will ensure that both the enforcement and service operations are appropriately coordinated and supported by headquarters. The Administration's reform plan will strengthen accountability and improve efficiency and effectiveness by allowing each of the two chains of command to focus on its unique requirements.

The key features of the Administration's plan are to:

- Effect an operational split between enforcement and services, resulting in two distinct, clear lines of authority from the field to headquarters, with an INS Commissioner continuing to be responsible for overall agency operations.
- Eliminate the current field structure in which district offices serve both enforcement and service functions, and replace it with separate enforcement and service offices that bring the right mix of staff and skills to local service caseloads and enforcement needs.
- Improve the quality of the workforce by creating separate enforcement and service career paths for INS employees, so that the best employees can move up the ladder and be rewarded for high performance.
- Restructure management operations to ensure an effective "shared support" operation (e.g., records and data management, technological support, employee relations, and administrative support) that will serve both the enforcement and the service sides of the agency.
- Establish a Chief Financial Officer to improve financial, accounting, and budget execution systems.

In addition to implementing the restructuring plan noted above, the Administration will continue its efforts to identify and take appropriate remedial action to eliminate any remaining areas of duplication or inadequate coordination between the INS and the Departments of Labor and State.

During its review, the Administration carefully evaluated the CIR recommendations. The CIR concluded that the INS' dual responsibility of welcoming legal immigrants and deterring illegal immigration has resulted in "mission overload." To address this issue, the CIR recommended disbanding the INS and reallocating its primary responsibilities to the Departments of Justice, State and Labor. We believe those recommendations would only compound the current problems with the Nation's immigration system.

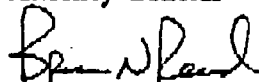
First and most important, this reallocation would hinder the coordination and communication necessary to maintain the integrity and efficiency of both immigration enforcement and immigration service operations. To be most effective, all immigration policy and management should remain within one agency at the Justice Department. Second, such a substantial reallocation of authority could require a lengthy transition, exacerbating existing concerns about long delays in immigration activities.

The Administration's plan is a fundamental change in the way the INS conducts business. The restructuring -- from top to bottom -- will address long-standing concerns about lines of authority and responsibility, consistency of policies and procedures, and performance within the INS. It will result in improved enforcement coordination, career paths that support greater professionalism, and measurable changes in the way INS provides services to the immigration community. Most important, it will greatly improve the ability of the INS to effectively and efficiently perform its duties. We look forward to working with you and other members of Congress to implement this restructuring plan and to ensure successful, long-term improvements in the Nation's immigration system.

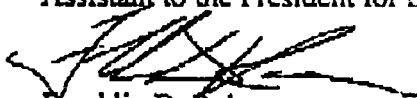
Sincerely,



Janet Reno
Attorney General



Bruce N. Reed
Assistant to the President for Domestic Policy



Franklin D. Raines
Director
Office of Management and Budget

Enclosures

Identical Letters Sent To:

**The Honorable Spencer Abraham
The Honorable Judd Gregg
The Honorable Ernest Hollings
The Honorable Edward Kennedy
The Honorable Alan Mollohan
The Honorable Lamar Smith
The Honorable Melvin Watt**

A FRAMEWORK FOR CHANGE: The Immigration and Naturalization Service

Background

America has always been a nation of immigrants, and this Administration is proud of the significant progress we have made toward improving this Nation's immigration system. Over the last five years, the INS has worked hard to curtail illegal immigration through tougher border control, reform of a badly abused asylum system, and removing record numbers of criminal and other illegal aliens. The agency has also worked to redesign and strengthen the naturalization process. While the INS has made important progress, the Administration recognizes that the recent changes in the breadth and scope of the agency's mission require a rethinking of its structure.

In its final report to Congress last fall, the Commission on Immigration Reform (CIR) called for significant reform to our Nation's immigration system. The major thrust of the CIR's proposed reform would move many immigration functions to the Department of State and Labor and would consolidate all immigration enforcement into a new Federal law enforcement agency within the Department of Justice.

In response to the CIR's recommendations, the President asked the Domestic Policy Council (DPC) to "evaluate carefully the [CIR] proposal and other reform options designed to improve the executive branch's administration of the Nation's immigration laws." In conducting this review, the DPC, working closely with the Office of Management and Budget, consulted with the Departments of Justice, Labor, and State, CIR staff, immigration experts and advocacy groups, and other White House offices, including the National Security Council. This review examined organizational and restructuring options including those formulated by the CIR and members of Congress. From this effort, the Administration established a new framework for reform, and the Justice Department contracted with a management consulting firm to provide an independent assessment of structural options and assist in making the Administration's framework "operational."

The Administration's Framework for Change

The DPC review process concluded that the CIR report correctly diagnosed many of INS' longstanding problems -- insufficient accountability between field offices and headquarters, lack of consistency, need for greater professionalism, overlapping organizational relationships, and significant management weaknesses. These problems have hampered the INS' ability to effectively enforce our immigration laws both at our borders and in the interior, and efficiently provide immigration and citizenship services. Improving the ability of the INS to pursue these critical priorities must be the goal of any reform plan.

After careful consideration and study, the Administration concluded that the most effective way to achieve this goal is to implement dramatic and fundamental reforms *within* the INS. The Administration's reform plan untangles INS' overlapping and frequently confusing organizational structure and replaces it with two clear organizational chains of command -- one for accomplishing its enforcement mission and one for providing services. Each operation would be headed by an Executive Associate Commissioner (EAC) who would report directly to the Commissioner through the Deputy Commissioner.

The plan will eliminate the current field structure in which regional district offices serve both enforcement and service functions and will replace it with separate enforcement and service offices that bring the right mix of staff and skills to local service caseload and enforcement needs. The result will be an INS organization with strengthened accountability and improved efficiency and effectiveness. The plan will allow each operation to focus its unique knowledge, skills, and abilities, while also retaining the essential integration functions needed to coordinate these operations.

Improved Customer-Oriented Services

- **Creates new local service offices.** The new immigration services operation would locate new service offices in immigrant communities around the country. These offices would focus on providing efficient and effective service, while maintaining the integrity of application processing. The offices would provide a range of services including: providing information to applicants, taking fingerprints and photographs, testing, and interviewing. Depending on community needs, some offices would be configured as full-service centers and others could serve as satellite locations to perform specific functions. These new service facilities would have a standard "look and feel" with clear signs, comfortable waiting rooms, evening and weekend hours, and other customer-friendly features.
- **Establishes accountability and clear lines of authority.** The heads of the local service offices would report to an Area Service Director. The Area Service Director would report directly to the Executive Associate Commissioner for Immigration Services. Area Service Directors would have the flexibility to move case processing responsibilities among offices within their area to maximize efficiency.
- **Establishes clear standards for customer service.** The Area Service Directors would be held accountable for meeting a nationally-established standard for timely processing and courteous service at all locations throughout the area.

- **Offers high-tech answers.** This new framework provides high-tech ways for people to receive better service through remote service centers. As part of this restructuring effort, INS will re-examine the capabilities of the four service centers that handle the automated, bulk processing workload of the current district offices. These centers currently take applications, create electronic records of them, and conduct the pre-processing necessary before an examination is administered. Under the new structure, more work would be shifted to the service centers, thus allowing local offices to focus on core activities which require interaction with customers. In addition, the capabilities of the centralized phone centers which will provide information to applicants and the public will also be examined.

A Strengthened and Integrated Enforcement Operation

- **Establishing a single, coordinated enforcement function.** The plan creates an operational chain of command dedicated solely to immigration enforcement, focuses comprehensively on illegal immigration problems at the border, and establishes better linkages with interior enforcement through a single point of accountability for performance. This approach would strengthen professionalism and improve results. This structure also would ensure priorities are shared and allow close coordination of day-to-day operations among each enforcement discipline.
- **Integrating enforcement and strengthening accountability.** The new enforcement operations areas would combine all functions related to the enforcement of immigration laws. Each enforcement area would be organized according to four functions, and led by a single director. The Area Enforcement Director would report directly to the Executive Associate Commissioner for Enforcement.
- **Organizing enforcement areas by function.** The enforcement areas would be organized around four functional goals: managing the border; inspections and management at ports of entry; investigations and removals; and detention.
 - 1) **Border Patrol.** The Border Patrol would perform its current border management functions of deterring illegal immigration, apprehending illegal aliens, and working to dismantle smuggling rings.
 - 2) **Inspectors.** By putting inspectors in the enforcement chain of command, the plan recognizes the critical role that ports of entry play in INS' border management strategy. This would give the ports a stronger role in the enforcement side of the agency and inspectors a direct reporting relationship to the Area Enforcement Director.

3) Investigations and Removals. This plan would also bring investigators, intelligence officers, and deportation officers into one multi-disciplinary component to focus on removals and the pursuit of fraud, smuggling, and illegal employment at the workplace. Offices in the field would be located in areas with the greatest demand for those functions -- similar to the traditional Special or Resident Agent-in-Charge (SAC/RAC) law enforcement model used by the FBI.

4) Detention and Enforcement Support. This framework would improve the logistical coordination of transporting criminal and illegal aliens and detaining them in long-term facilities by centralizing the current district office detention and transportation operations. Under the new framework, this component would be better able to manage open bed space at INS and contract facilities and improve and monitor conditions at these facilities.

Shared Support

- **Providing the right tools.** The “shared support” operation (e.g., records and data management, technological support, employee relations, and administrative support) would serve as the administrative and technological backbone upon which both enforcement and service operations depend under the new framework. Under this new structural framework each side of the agency has the appropriate administrative and technological tools to do its jobs in the most efficient and cost-effective way. These would range from new computer software systems that are “user-friendly” for enforcement agents and service officers, to appropriate training to strengthen professionalism.
- **Improving accountability.** Under this restructuring plan the shared support function will be held accountable for meeting the needs of the enforcement and service operations in a timely and effective manner.
- **Managing essential records.** An important cohesive function of the shared support operation is the management of all of INS’ files and electronic databases. INS’ records are the foundation of its work -- whether in law enforcement or the provision of services to its customers. For example, the information contained in those records tells an INS deportation officer that an individual has overstayed his visa and the last address at which he might be found. It also tells an adjudicator whether a person has ever entered without inspection, therefore jeopardizing the alien's eligibility to become a legal permanent resident.

New "Strategy" Office

- **Setting priorities and assessing results.** The Administration's proposed structure includes the creation of a small, new "strategy" unit that would focus on setting priorities, long-range strategic planning, and policy development, as well as analyzing the effectiveness of their implementation. The unit would draw heavily on staff from headquarters and the field, as well as create subject area task forces to draw on the expertise of individuals accountable for each program.

New Chief Financial Officer Role

- **Enhancing accountability and efficiency.** The new structure establishes a Chief Financial Officer to ensure effective allocation, control, and monitoring of the agency's finances. This would enhance accountability for managing the agency's resources and ensure that immigrant services and enforcement have clearly separated and defined resource streams.

Other Management Improvements

INS recognizes that a fundamental restructuring is only one aspect of improving its ability to build a more effective organization. As part of its reform efforts, the agency also is planning management initiatives such as fundamentally redesigning outdated business processes and the creation of new training opportunities for employees.

Conclusion

Preserving our country's tradition as a Nation of laws and a Nation of immigrants requires one agency with clearly defined operational lines of authority and accountability. This new structure will allow our Nation to better control its borders and provide improved service and benefits to the immigrant community. The Administration's plan is a bold initiative to strengthen the INS' capacity to accomplish this critical mission.

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Bureau Director appointed for a set term (5-years).	INS Commissioner remains a Presidential appointee with no set term.	Ensures agency-head has the confidence of the Attorney General and President.
Bureau personnel should be upgraded to receive law enforcement pay and benefits commensurate with those of other DOJ law enforcement components.	The INS is reviewing pay options to ensure law enforcement officers, with similar duties, receive comparable pay and benefits.	The study will provide a clear assessment of pay disparities between enforcement agents performing similar tasks and provide guidance to promote increased professionalism and positive morale.
Establish a Uniformed Service Enforcement Branch that merges INS Inspectors, Border Patrol and detention offices into one uniformed service. Investigations/intelligence would constitute a "white-collar" division within this new bureau.	Consolidates all enforcement functions under area enforcement directors, but maintains distinct functions of Border Patrol agents, inspectors, investigators, and detention officers.	Union representatives and affected employees will be involved in the development of any pay reform proposal, which will require legislation and a phased implementation process. The Administration is also studying options for common entry level training and career paths for enforcement officers.
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Establish a "Removal Officer" position that integrates the functions of investigations and deportation.	Investigations and deportation officers will be merged into an investigation and removal unit under an area enforcement director. The merits of merging the two occupational series are still under consideration.	Close coordination, oversight, and management will ensure the best use of this staff to expedite the removal of illegal aliens.

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Regional offices would be retained for administrative and management oversight of field office operations.	Regional offices will be restructured to be operational rather than administrative. Instead of three regional offices, the plan creates geographic enforcement areas. Each area enforcement director will report directly to the EAC for Enforcement Operations.	Provides direct operational oversight of enforcement activities to better achieve coordination and execution of enforcement priorities.
<i>Immigration Services:</i> Adjudication of eligibility for immigration-related applications (immigrant, limited duration admissions, asylum, refugee, and naturalization) in the Department of State under the jurisdiction of a new Undersecretary for Citizenship, Immigration, and Refugee Admissions.	Within the INS an Executive Associate Commissioner (EAC) for Immigrant Services will be established consisting of all immigrant benefit and service functions reporting directly to the INS Deputy Commissioner/Commissioner. This functional split between immigrant service and enforcement operations extends from the field to headquarters.	Establishes a single immigration service organization but preserves integration/synergy between enforcement and service functions by keeping them within the INS. Establishes clear lines of authority and divisions of responsibility between these two operations. Maintains a single immigration focal point within the DOJ.
Establish a Bureau of Immigration Affairs at the Department of State to manage the immigration process including domestic adjudication/examination (work authorization/adjustment of status) and employment verification.	Naturalization functions included within a restructured EAC for Immigration Services.	Immigration enforcement responsibilities are integral to the benefit review and adjudication process. Neither mission can be conducted effectively if placed in separate agencies. Both enforcement and service operations enforce the same law (Immigration and Nationality Act) and consistent outcomes, require common processes, data collection, and employee cross-training.

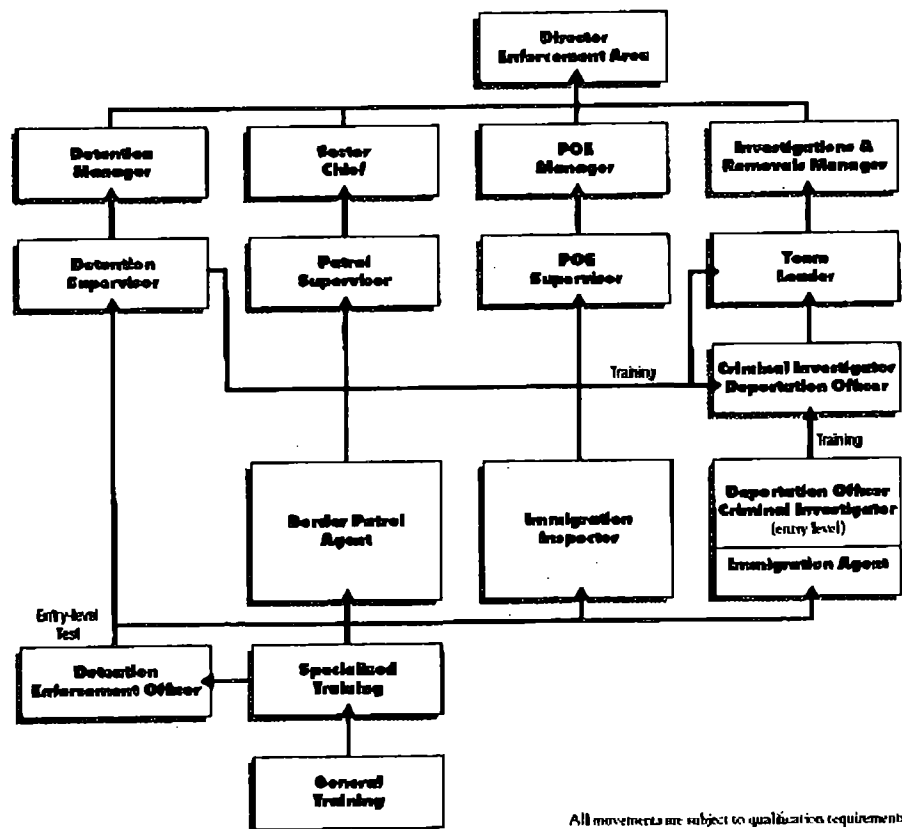
<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Establish a Bureau of Refugee Admissions and Asylum Affairs at the Department of State responsible for overseas refugee admissions and refugee and asylum functions conducted by the INS.	Functions included within a restructured EAC for Immigration Services.	Same as above. INS and State will initiate an operational review to minimize overlap and duplication within INS and State-run visa, refugee, and asylum programs.
Establish a Bureau of Citizenship and Passport Affairs at the Department of State responsible for naturalization and determinations of citizenship and passport issuance.	Functions included within a restructured EAC for Immigration Services.	The State Department is not equipped to conduct the service and enforcement processes required in the naturalization program. Moreover, this reallocation of functions to State may conflict with its foreign policy mission. The naturalization redesign addressed the concerns raised by the CIR while retaining this responsibility within the INS.
Establish Quality Assurance Officers to oversee records management, procedure monitoring, fraud investigations, and internal review.	INS has expanded its INSpect program to assist in internal review and audits. The EAC for Immigration Services will establish an office to monitor and ensure quality service, benefit processes, products, and operations.	The naturalization redesign has established quality assurance checks throughout the process. The redesign incorporates sweeping changes in processes, records management, data flow and retention, and customer service as measures of integrity.
Establish a field structure that uses existing INS Regional Service Centers and State's National Visa Center and create a local office structure that is separate from immigration enforcement offices.	Local service offices will move from the current district office configuration to a community-based operation modeled on immigrant population density data. Service offices will not necessarily be located in the same location as enforcement operations. The EAC for Immigration Services will also rely heavily on direct mail to existing INS service centers.	The naturalization redesign study has recommended direct-mail to service centers for benefit processing and INS is implementing these recommendations. Beginning April 15 all naturalization processing will be direct-mail and phased implementation of direct mail processing for all other benefit applications is planned for completion over the next two years.
<i>Immigration-related Functions:</i> Consolidate enforcement of immigration-related employment standards in the Department of Labor.	Enforcement of immigration-related labor and employment standards will be shared between the Department of Labor (DOL) and INS. DOL and INS will develop an MOU to improve coordination and promote more effective worksite enforcement and worker protection.	Will provide a mechanism for more effective enforcement of immigration-related labor laws.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
All worksite investigations to ascertain employers' compliance with employment eligibility verification requirements should be conducted by the Department of Labor.	The authority to verify compliance for violations of employment eligibility will be shared between INS and DOL. The Administration is studying options for more effective DOL involvement in worksite enforcement of immigration-related labor standards.	Will provide a mechanism for the more effective enforcement of employment verification requirements.
Upon the adoption of an expedited process for the admission of both immigrant and temporary workers, DOL should be given responsibility and resources for enhanced monitoring of employers' fulfillment of the attestation terms they filed to bring in workers.	DOJ and DOL will work together to develop reforms to the current immigration-related employment programs to streamline the certification process and strengthen employer monitoring.	DOL is evaluating its immigration structure in order to streamline the current processes while ensuring labor protections. With sufficient delegation of authority from DOJ, DOL will further streamline the certification process and increase its enforcement of employer obligations.
<i>Administrative Review:</i> Administrative review of all immigration-related decisions should be consolidated and considered by a newly-created independent agency, the Agency for Immigration Review.	Maintains the current review and appeals mechanism.	The Administration is studying options to consolidate some review and appeals functions currently in the INS and DOL into the Executive Office of Immigration Review under the Attorney General.
Organization headed by a Presidentially appointed Director with no say in the substantive decisions reached on cases considered by any division or component of the agency.	Maintains the existing Department-head appeal process/final decision.	Placement of the adjudication process within a Department ensures executive oversight of administrative appeals and uniform and consistent national immigration policy.
<i>Agency-wide Reforms:</i> The Commission urges the Federal Government to make needed reforms to improve management of the immigration system.	Significant management improvements have been accomplished at INS over the past five years. This restructuring plan addresses a number of management and process weaknesses that remain within INS.	INS has accomplished major management, system, and process improvements in the face of a highly visible and growing mandate, large increases in resources and staffing, and unceasing historic demands for immigrant services.

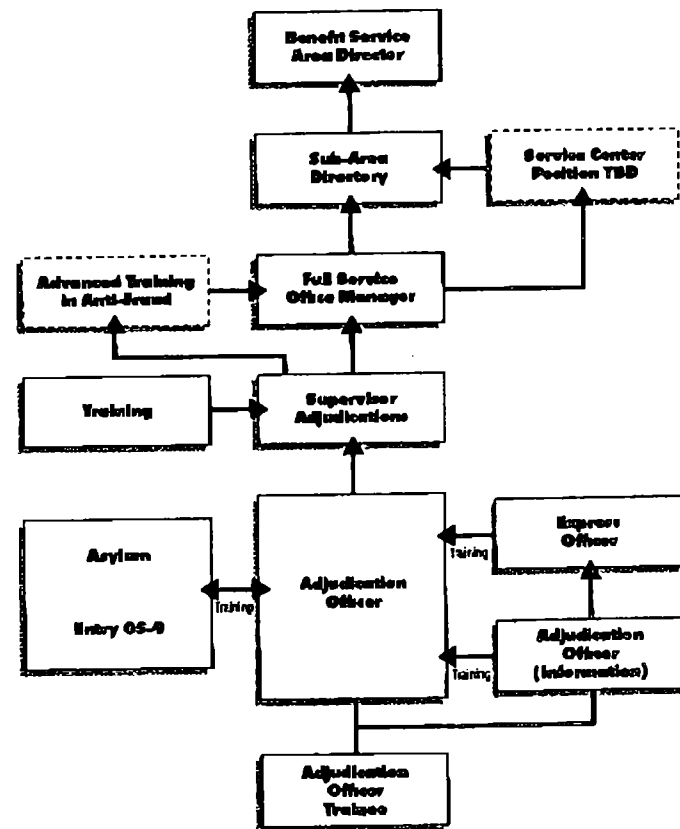
<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Set more manageable and fully-funded priorities (realistically-achievable short and long-term goals and greater numerical specificity on expected annual outcomes to which agencies should be accountable).	The INS has developed strategic performance plans and measures in both enforcement and service operations. We believe that these plans and measures are manageable and will accurately capture agency performance. As measures are refined, annual outcomes can help judge performance and highlight strengths and weaknesses that require management attention.	INS' FY 1999 Budget justification provides measurable performance goals in enforcement and service operations. The goal is result-oriented performance measures that allow management to judge performance in the aggregate and provide line-managers with the data necessary to do their job effectively.
More fully develop the capacity for policy development, planning, monitoring, and evaluation. Domestic Policy Council (DPC) responsible for overseeing Federal immigration policy development.	The Administration plan will consolidate long-term immigration planning within its strategic planning office reporting to the Commissioner. This group will coordinate agency-wide policy development. The DPC has established a policy-level group that includes immigration-related agencies and Executive Office of the President staff. This group looks at short and long-term immigration policy issues and concerns and coordinates the development of the Administration's position on immigration matters.	Will improve Government-wide immigration policy development and oversight.
Improve systems of accountability and measures of performance.	The key feature of this restructuring plan is to build clear lines of responsibility and accountability within the INS. The restructuring will ensure that line managers have the necessary tools to do the job effectively and performance can be measured. Current confusing and overlapping organizational relationships will be eliminated and replaced with clear lines of command in enforcement, services, and within the administrative support functions -- vital to INS' operational effectiveness.	Much of the work INS performs requires close coordination between enforcement and services. Under this restructuring coordination is maintained while reporting relationships remain clear so that policy can be developed, coordinated, and applied consistently.

<i>CIR Recommendation</i>	<i>Administration Restructuring Proposal</i>	<i>Rationale</i>
Improve the recruiting and training of managers. Expand the ranks of skilled and properly trained supervisors and managers.	INS has consolidated its recruitment effort to ensure consistency and quality and has emphasized the importance of basic, advanced, and management training. Training is a core element of the Commissioner's professionalism initiative. Performance in meeting training goals is measured by INS and DOJ. INS has sought to infuse new skills and thinking by hiring from both public and private sectors.	Consolidated and consistent recruiting has been achieved by establishing a central operation in Minneapolis, MN for hiring. Similarly, INS has established a management training facility in Dallas, TX, and equipped the Border Patrol training facility in Charleston, S.C. In concert with the establishment of these facilities is the creation of advanced and management training modules for enforcement, service, and professional staff.
Strengthen the customer service orientation. Establish a separate career track for benefit and service operation employees.	This restructure establishes separate career paths for enforcement and service personnel.	Lack of a clear career paths for enforcement and service personnel means INS often loses its best employees. By creating a separate career path for enforcement and service operations, this restructuring will increase retention and, therefore improve overall morale.
Use fees for immigration services more effectively. Fees should reflect true costs, cover the costs of services provided, result in timely and courteous service, and provide flexibility in their use to meet changing service requirements and demands.	This restructuring, combined with the naturalization redesign, should address this concern. INS completed an activity-based-costing (ABC) review of its benefit fee structure which has resulted in a proposed fee increase that accurately estimates the cost of providing benefits. INS will begin to conduct a "base" funding examination of its fee structure in FY 1998 to ensure benefit and service fee receipts support service-related operations. The establishment of a Chief Financial Officer within INS, combining budget and financial operations, will also strengthen its ability to manage appropriated and fee-receipt funds.	Fees should reflect true costs, cover the costs of services provided, result in timely and courteous service, and provide flexibility in their use to meet changing service requirements and demands. The base funding review of its fee structure and the ABC review should help assure all interested parties that fees reflect true costs and that they support fee services.

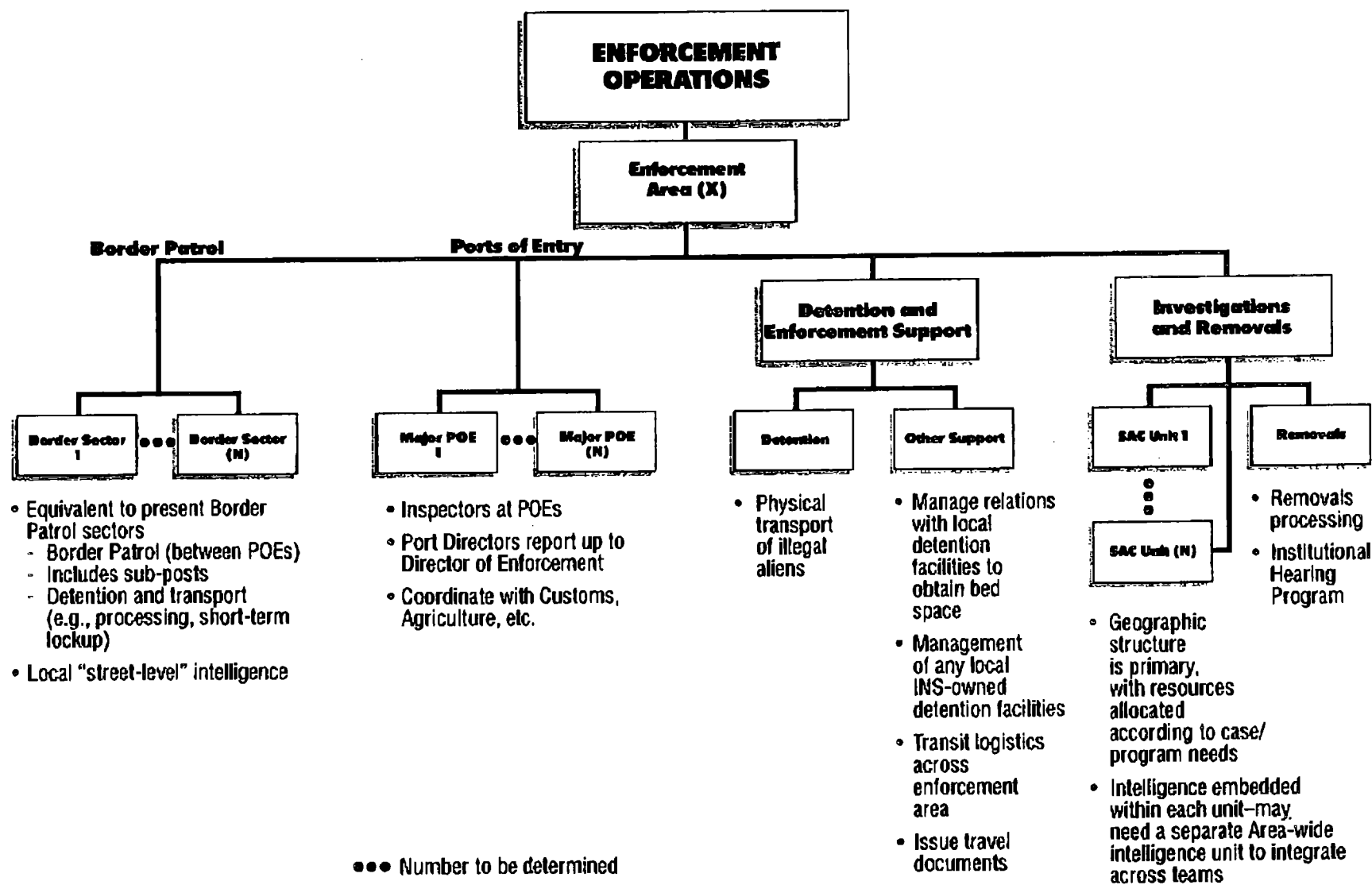
Proposed Enforcement Operations Career Path



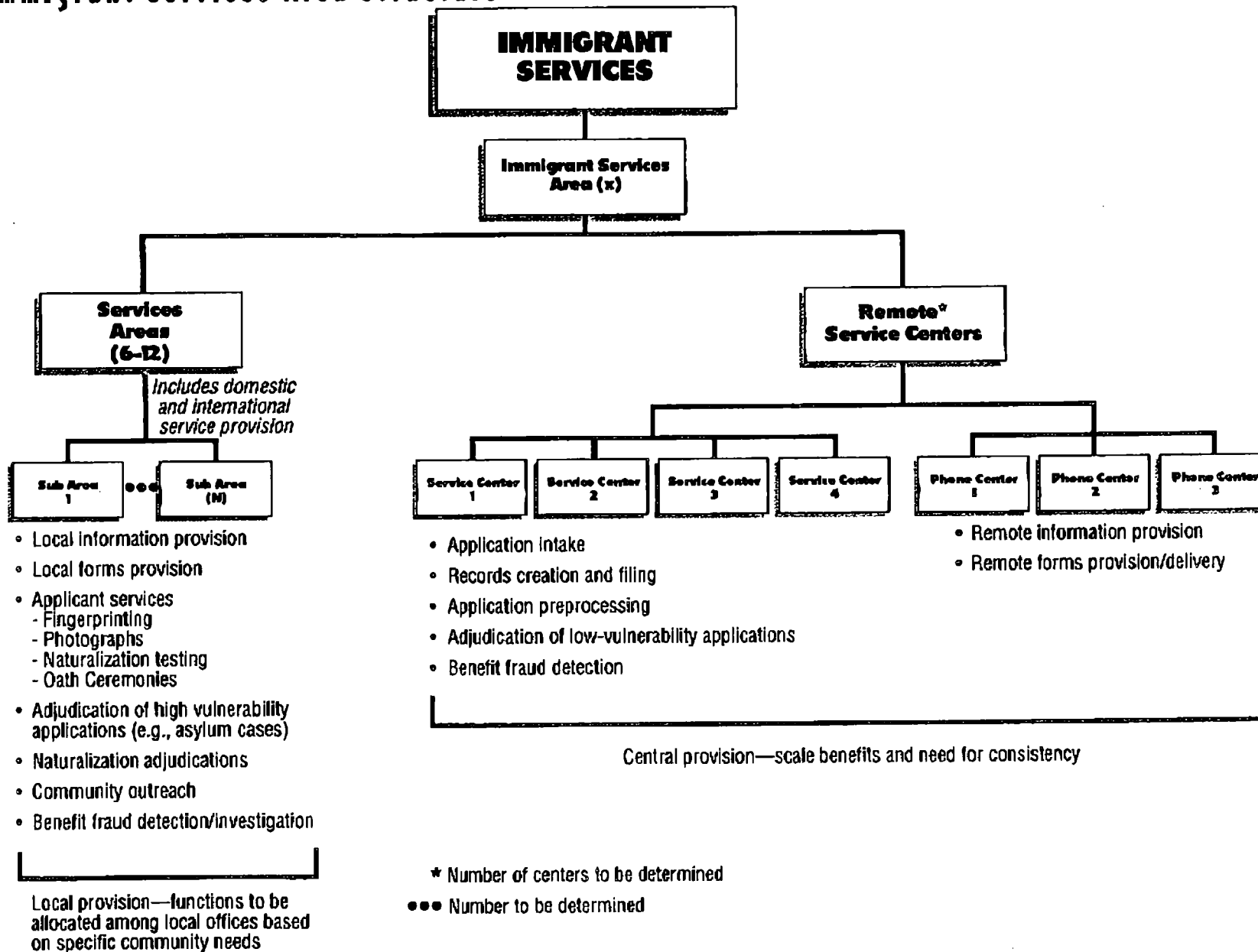
Proposed Immigrant Services Career Path



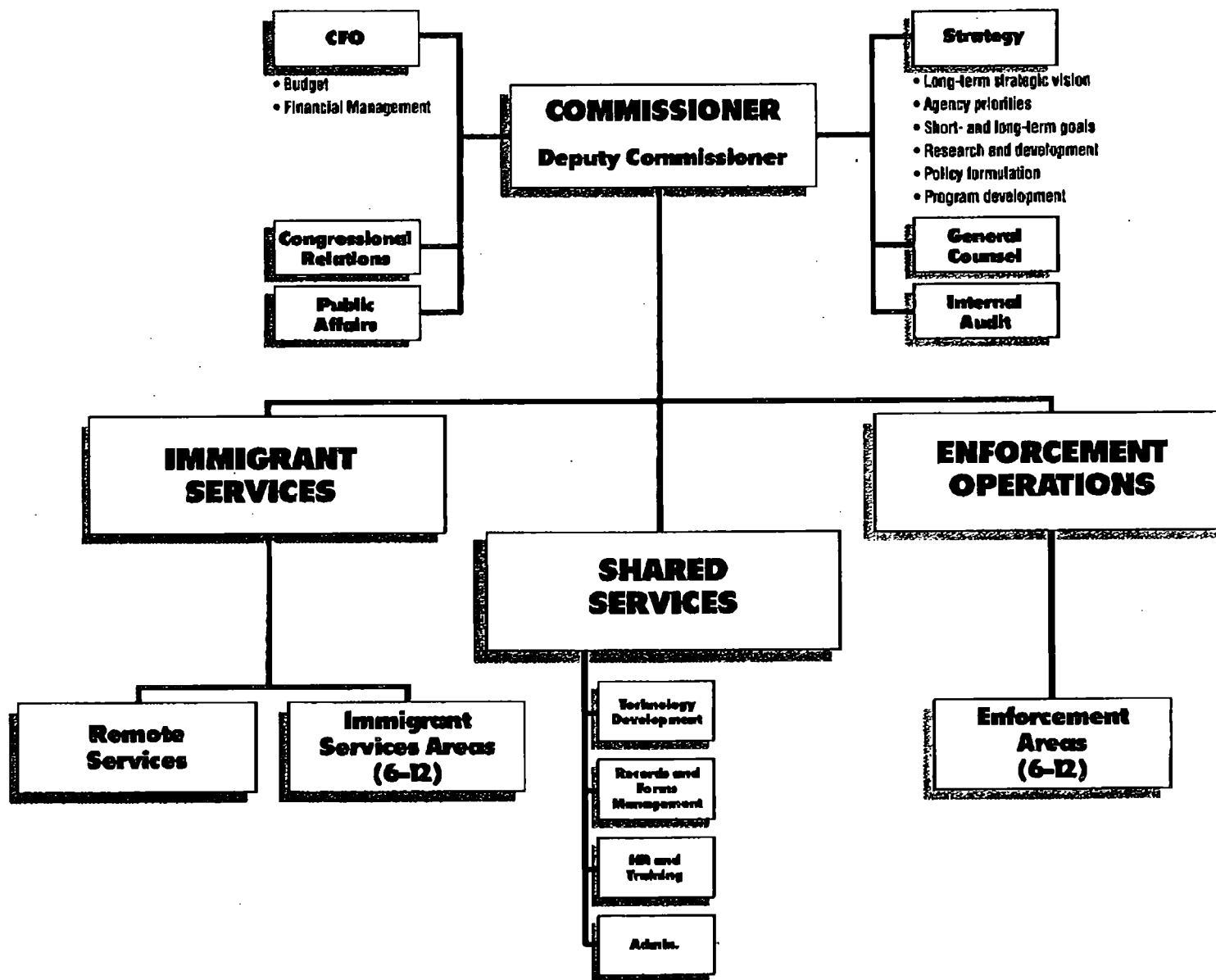
Enforcement Area Structure



Immigrant Services Area Structure



Proposed INS Organization



INS Chief Eyes Radical Change to Shield Agency

By Marcus Stern
COPLEY NEWS SERVICE

WASHINGTON -- Fearful that a critical Congress might carve up the Immigration and Naturalization Service, Commissioner Doris Meissner is set to propose a radical restructuring of the agency to separate enforcement activities from services such as granting citizenship.

Meissner summoned senior INS managers from around the country to Washington this week for a two-day briefing that ended yesterday with some managers heading home saying they were confused and anxious about the far-reaching plan.

Under the plan, the INS district in San Diego would no longer exist as it does today, but would be subsumed by a larger area or region that would have its headquarters in Los Angeles or San Francisco.

Such decisions haven't been made, however, and it remained unclear yesterday how many local jobs were at stake, if any.

How Congress will react also is unclear. Meissner is scheduled to present the plan publicly at a hearing before a congressional subcommittee next week. She can expect a skeptical reception from Rep. Hal Rogers, R-Ky., chairman of the House subcommittee that oversees the INS budget.

Yesterday, Rogers repeated his call to break up the agency.

"They've reorganized time and again over the last several years," he said in an interview, adding that he still is awaiting a briefing on the plan.

"Nothing ever gets better. It gets worse. I'm very skeptical that anything (INS officials) recommend can be achieved or will be enough."

Meissner's plan calls for a complete separation of the agency's dual missions of both enforcing immigration laws and handing out benefits. But it would keep the two activities under the same agency roof in Washington.

"You need a wall, but the wall has to have windows," said an official familiar with the plan. "This new structure sends a clear message internally and externally that when you come to the INS for a benefit, you will be treated as a valued customer."

Others within the INS described it as a pre-emptive attempt to "inoculate" the agency from any efforts by Congress to break it up.

The U.S. Commission on Immigration Reform last year issued a final report calling for dismantling the INS, giving its benefit activities to the State Department, its duty to keep undocumented immigrants from getting jobs to the Labor Department, and leaving all of its border enforcement activities within the Justice Department, the parent agency of the INS.

Congress agreed with the commission that the INS was suffering mission overload and ordered the Clinton administration to review the recommendations and report to Congress by April 1 this year.

A White House review concluded that the INS should be kept intact. The administration hired the management consulting firm of Booz-Allen & Hamilton to help rearrange the agency's functions.

That study is now all but complete and serves as a basis for the latest reorganization initiative, Meissner's third since becoming commissioner in 1993.

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"I don't expect members of the commission to find this to be an adequate response, but we'll listen," said ex-Rep. Bruce Morrison, who served as a member of the commission and once served as chairman of the House immigration subcommittee.

"It frankly is disappointing that the imperative seems to be to preserve the Immigration and Naturalization Service as a unit. That seems to have been very, very high on somebody's agenda," said Morrison, a Democrat from Connecticut.

Past calls for breaking up the agency have failed.

A government study in 1993 found that no broad-scale reorganization has ever been approved "because of opposition from agencies and departments that would lose jurisdiction, from congressional committees that would be similarly affected, and from agency personnel and private-sector organizations whose interests would be adversely affected."

"I'm not working under illusions that this is an easy process," said Rogers of Kentucky. "People have been trying to do this since the '30s because the agency has never worked. We've tripled (its) budget in the last few years and it keeps getting worse and worse. There's scandal after scandal."

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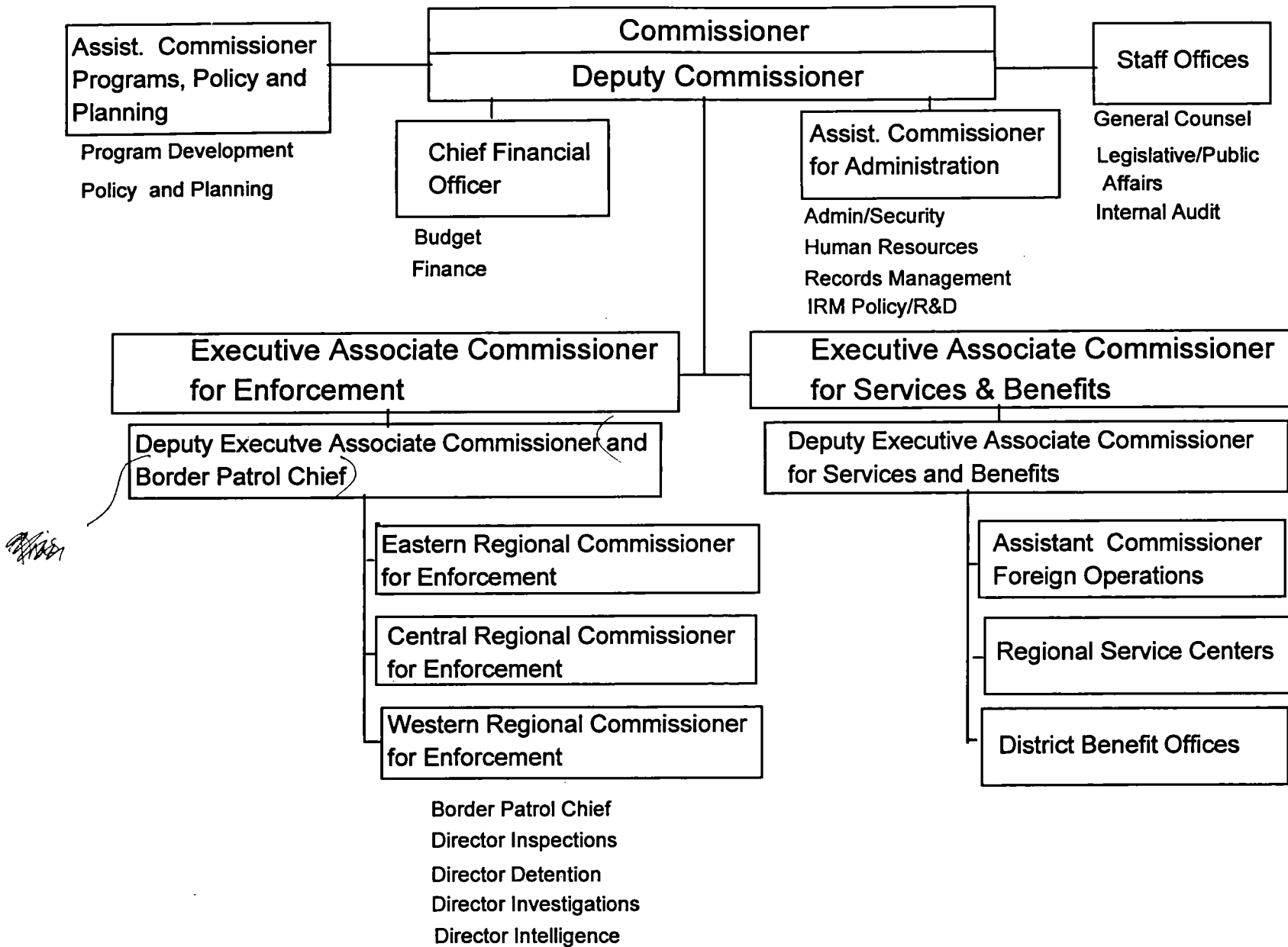
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INS Reorganization

In response to the September 1, 1997, release of the final report of the Commission on Immigration Reform (CIR), the President directed the Domestic Policy Council (DPC) to review the CIR report and recommend ways to improve and streamline Federal immigration policy development and management. The DPC working group will use the President's FY 1999 budget as the vehicle to transmit the President's proposal to the Congress. Towards that end, the following organizational option for the INS has been developed. This reorganization proposal permits INS to meet the fundamental programmatic challenges facing the agency in a way that addresses the concerns identified by the CIR while permitting INS' core functions to remain intact. The Department and INS are requested to address this organizational proposal as part of any appeal.

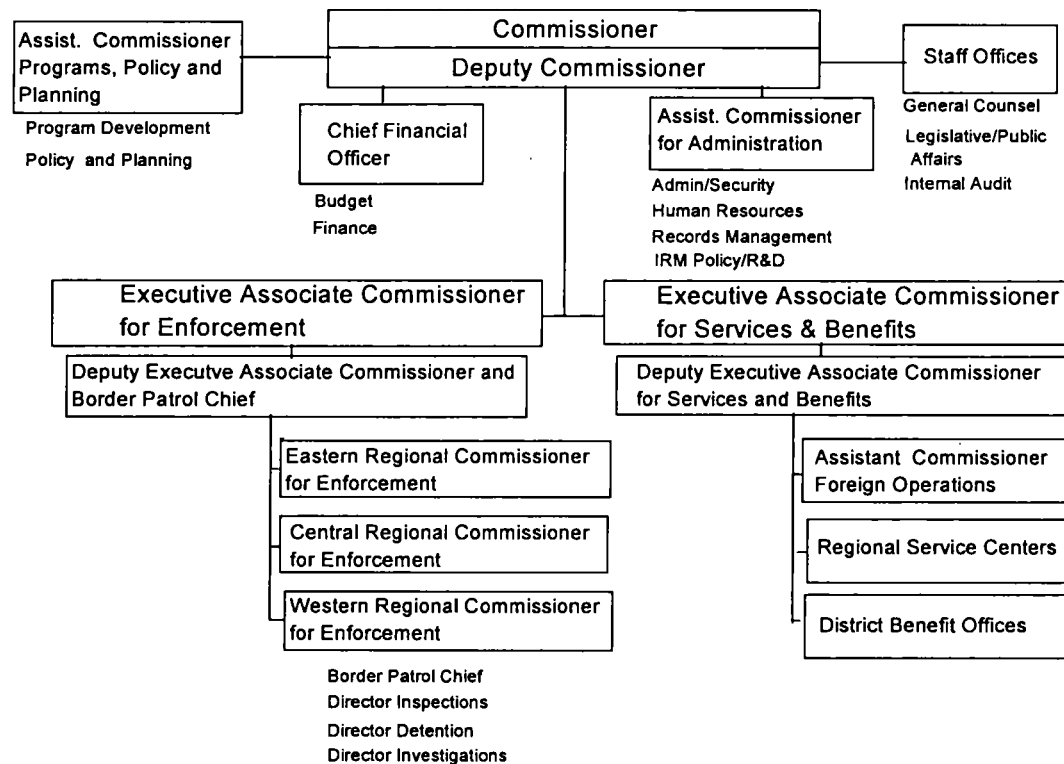
Restructure Headquarters:

Up until 1993, INS operated with insufficient resources, weak or non-existent management systems and processes, and lackluster internal management. Since then INS has made progress implementing major changes to enforcement and benefit systems, improving management practices, and upgrading staff capabilities at a time when resources and responsibilities have grown significantly. Instead of dismantling an improved INS as recommended by the CIR, an effort should be made to build on the accomplishments of the past four years. What INS requires is a streamlined organizational structure based on programmatic priorities and clear lines of authority, responsibility and accountability. Such a structure would focus attention and assign responsibilities to those charged with carrying out INS' dual enforcement and benefit roles. We believe these dual but interrelated responsibilities should remain within one agency and properly within DOJ. A future INS organization should have these features:

INS Headquarters, lead by a Commissioner and Deputy Commissioner, would focus on policy, strategic planning and management support (finance, records, Information Resource Management (IRM) policy and R&D); budget formulation; and compliance with policy and procedures. All line management and operational authority for agency-wide support systems like finance, budget, IRM policy, R&D, and records management would be consolidated in Headquarters.

- Reflecting the importance of INS' fee and fine account receipts (\$1.4+ billion) and the deficient condition of INS' financial operations, a separate Chief Financial Officer (CFO) would be established and report directly to the Commissioner. The CFO organization would include agency-wide budget formulation and execution.
- IRM policy and standards and all R&D initiatives would be consolidated within Headquarters. Operational and support IRM functions would report to the respective program offices.

- A small policy and planning office would develop long-range strategic plans, perform GPRA implementation and monitoring, and improve INS' important statistically policy and measurement responsibilities.
- Headquarters Administration should focus on consolidating records management, improving agency facilities, and managing a streamlined administrative service center operation to effectively meet the needs of field operations.



Programmatic Focus:

While the CIR recommends splitting the agency, a programmatic split that maintains the enforcement/benefit link necessary to function effectively accomplishes the same goal. The reorganization would separate **Enforcement** and **Services** under the leadership of two **Executive Associate Commissioners** (EAC). The creation of these two EACs would ensure that clear lines of authority, responsibility and accountability exist in program operations, help bring a field perspective to Headquarters decision making, and reduce stovepipe operations currently

prevalent in enforcement operations. The CIR recommendation to merge INS' enforcement agents (Border Patrol, inspection and detention) into one uniform service and a white-collar investigative service should be implemented. This reorganization supports this evolutionary initiative by putting the Border Patrol Chief in a direct line of authority for all enforcement activities and operations organized along Border Patrol sector and regional boundaries. The CIR also calls for higher visibility and focused management attention on the provision of services and benefits to immigrants, and to ensure organizational safeguards exist so that fee account receipts support fee-related activities. The division of responsibilities as proposed under this reorganization and improved financial systems will help achieve these goals. Under this proposed organizational structure, the EACs for Enforcement and Services would be responsible for the following:

Executive Associate Commissioner for Enforcement would coordinate all enforcement operations and staff (Border Patrol, investigation, inspections, intelligence and detention).

- A Deputy Executive Commissioner, who is also the Border Patrol Chief, would have line authority for all enforcement activities to ensure coordination between enforcement components.
- Three Regional Enforcement Commissioners would be responsible for coordinating INS enforcement functions within the regions. A Deputy Regional Commissioner would also be the Regional Border Patrol Chief with line authority in that region.
- INS enforcement functions would be organized along the Border Patrol sector model with sector chiefs for each function reporting to the region.

Executive Associate Commissioner for Services and Benefits would be responsible for providing efficient service and effective and accurate delivery of benefits to the immigration community.

- Regional Service Centers, which will play an expanded role as direct mail benefit processing comes on line, will report to this EAC.
- Foreign Operations, which has dual benefits and enforcement responsibilities for refugees, asylees and international anti-terrorism efforts would report to this EAC.
- All existing District Office operations (31 district offices or the expanded 80 suboffices currently under development) would report directly to the Deputy EAC. This direct reporting relationship will ensure that standards are consistent agency-wide and these standards and operating procedures are understood and applied consistently within all of INS' districts.

goal (+) why we are going that way

that includes greater detail than we have in our passbook but not all specifics about role of each person

Def. of structure to include what functionally will happen @ each step (processes). describe functional

What set up to coordinate btm enf / serv.

Resolve distinct issue

Resolve regional questions?

Functionally-based organization

by March 1st

②

~~Recommend~~ Recomm. for implementation (how the implementation would happen)
beyond the skeleton or frame

Processes to drive transformation over time

Want to package functionally-based organization

DM: concerned that specific details are not made from too far away

Org. diagram that has:

①

organizational chart w/ interrelationships / reporting, etc.

But w/out specifics about what each person will type into the computer.

②

~~What else~~ What else would we need to do.
look below division level.

More detail around staff here — domestic split w/ how integrated

Proposed Schedule for INS Review Process:

[Two meetings per week through mid-December]

Wednesday, 11/19: State Department

Friday, 11/21: Immigration groups*

Monday 11/24: Labor Department

Tuesday 11/25: Commission on Immigration Reform

Wednesday 12/3: Meeting with Justice/INS

Friday 12/5: Interagency meeting

12/? : Deputies Meeting

12/? : Principals meeting

Deadline for FY 99 Budget: mid-December

Deadline for submission to House Appropriations: April 1

White House

Elena Kagan- DPC

Maria Echaveste -OPL

Chuck Ruff -WHC

Julie Fernandes - DPC

Leanne Shimabukuro - DPC

Jose' Cerda - DPC

Rob Weiner - WHC

Steve Warnath - PCPC

Jeff Morales - OVP/NPR

Scott Busby - NSC

Steve Mertens - OMB

Department of Justice

John Morton - DAG

Phil Bartz - DAG

John Trasvina - Office of Special Counsel

INS

Robert Bach - Office of Policy
David Martin - General Counsel

Department of Labor

John Fraser - Wage and Hour Division
Marvin Krislov - Solicitor's Office
Seth Harris - Office of Policy
John Beverly - Employment and Training Administration

Department of State

- on travel
out of office
until Friday*
- John Caulfield - Bureau of Consular Affairs/Policy → *Public Affairs 202/647-1488*
 - Donna Hamilton - Bureau of Consular Affairs → *DAS for Visa Services 647-9584*
 - Theresa Rauch - Bureau of Population, Refugees and Migration → *647-7360*
 - Kathleene Charles - Budget and Planning

HHS*

Irene Bueno - Congressional
Office of Refugee Assistance

*663-1047
Terry Roosh
Let msg.*

Commission on Immigration Reform

Susan Martin
Andy Schoenholtz
2 others from management team

Immigration Groups*

National Immigration Forum - Angie Kelly
Mexican American Legal and Education Defense Fund
National Asian Pacific American Legal Consortium - Karen Narasaki
U.S. Catholic Conference - Michael Hill
NCLR - Cecelia Munoz
American Immigration Lawyers Association - Judy Golub
Rick Schwartz