

## Why GAO Did This Study

Each year, the Department of Homeland Security's (DHS) U.S. Citizenship and Immigration Services (USCIS) processes millions of applications for immigration benefits using a paper-based process. In 2005, USCIS embarked on a major, multiyear program to transform its process to a system that is to incorporate electronic application filing, adjudication, and case management. In 2007, GAO reported that USCIS was in the early stages of the Transformation Program and that USCIS's plans partially or fully met key practices. In 2008, USCIS contracted with a solutions architect to help develop the new system. As requested, GAO evaluated the extent to which USCIS has followed DHS acquisition policy in developing and managing the Transformation Program. GAO reviewed DHS acquisition management policies and guidance; analyzed transformation program planning and implementation documents such as operational requirements; compared schedule and cost information with GAO best practice guidance; and interviewed USCIS officials.

## What GAO Recommends

GAO recommends that USCIS ensure its program schedules and life-cycle cost estimates are developed in accordance with best practices guidance. DHS concurred with GAO's recommendations and outlined the actions that USCIS is taking or has taken to address each recommendation.

## IMMIGRATION BENEFITS

### Consistent Adherence to DHS's Acquisition Policy Could Help Improve Transformation Program Outcomes

## What GAO Found

USCIS has not consistently followed the acquisition management approach that DHS outlined in its management directives in developing and managing the Transformation Program. USCIS awarded a solutions architect contract in November 2008, in effect selecting an acquisition approach before completing documents required by DHS management directives. Specifically, DHS's acquisition policy requires that prior to selecting an acquisition approach, programs establish operational requirements, develop a program baseline against which to measure progress, and complete a plan that outlines the program's acquisition strategy. However, USCIS did not complete an Operational Requirements Document until October 2009, which was to inform the Acquisition Program Baseline and the Acquisition Plan. Consequently, USCIS awarded a solutions architect contract to begin capability development activities prior to having a full understanding of the program's operational requirements and the resources needed to execute the program. GAO has previously reported that firm requirements must be established and sufficient resources must be allocated at the beginning of an acquisition program, or the program's execution will be subpar. The lack of defined requirements, acquisition strategy, and associated cost parameters contributed to program deployment delays of over 2 years. In addition, through fiscal year 2011, USCIS estimates it will have spent about \$703 million, about \$292 million more than the original program baseline estimate.

USCIS expects to begin deployment of the first release of the Transformation Program in December 2011. However, USCIS is continuing to manage the program without specific acquisition management controls, such as reliable schedules, which detail work to be performed by both the government and its contractor over the expected life of the program. As a result, USCIS does not have reasonable assurance that it can meet its future milestones. USCIS has established schedules for the first release of the Transformation Program, but GAO's analysis shows that these schedules are not reliable as they do not meet best practices for schedule estimating. For example, program schedules did not identify all activities to be performed by the government and solutions architect. Moreover, as outlined by DHS acquisition management guidance, a life-cycle cost estimate is a required and critical element in the acquisition process. USCIS has developed and updated the \$1.7 billion life-cycle cost estimate for the Transformation Program, but USCIS's individual schedules for the Transformation Program did not meet best practices for schedule estimating, raising questions about the credibility of the program's life-cycle cost estimates. Because some program costs such as labor, supervision, and facilities cost more if the program takes longer, reliable schedules can contribute to an understanding of the cost impact if the program does not finish on time. Collectively, and moving forward, not meeting best practices increases the risk of schedule slippages and related cost overruns, making meaningful measurement and oversight of program status and progress, and accountability for results, difficult to achieve.