

REPORT TO CONGRESS ON THE BASIC PILOT PROGRAM JUNE 2004

PURPOSE OF THE REPORT

The desirability of automating the employment verification process established in the 1986 Immigration Reform and Control Act (IRCA) has been the subject of considerable debate. Proponents have argued that automating the process would make employment verification more effective in preventing unauthorized employment and, consequently, would act as a deterrent to illegal immigration to the United States. Opponents have raised concerns about potential negative impacts of automated employment verification on discrimination and privacy. Because of the uncertainty about the impacts of electronic employment verification, Congress and the former Immigration and Naturalization Service (INS)¹ approached implementing automated employment verification cautiously by establishing and evaluating voluntary pilot programs to explore the effects of such programs.

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA) mandated that the former INS and the Social Security Administration (SSA) implement and evaluate three employment verification pilot programs over a 4-year period. In response to this legislation, INS implemented the Basic Pilot, the Citizen Attestation Verification Pilot (CAVP), and the Machine-Readable Document Pilot (MRDP) and arranged for their evaluation by independent contractors. Congress extended authorization for the pilots for an additional 2 years in 2001 and for another 5 years through the Basic Pilot Program Extension and Expansion Act of 2003, enacted on December 5, 2003. The CAVP and the MRDP programs were terminated on their initial expiration dates in 2003.

The Basic Pilot Program Extension and Expansion Act of 2003 also mandated the Secretary of Homeland Security to expand the Basic Pilot to all 50 States not later than December 1, 2004, and required that the Secretary submit a report to House and Senate Judiciary Committees by June 1, 2004. The June 1 report is required to address whether the problems identified in the pilot evaluation reports have been substantially resolved and describe the actions the Secretary of Homeland Security will take to resolve any outstanding problems raised in the pilot evaluation report before expanding the Basic Pilot to all 50 States.

This U.S. Citizenship and Immigration Services (CIS) report fulfills this legislative mandate. It discusses measures that DHS and SSA have already taken to address the major problems noted

¹ The evaluations were conducted under the auspices of the Immigration and Naturalization Service (INS) within the Department of Justice. Following establishment of the Department of Homeland Security on March 1, 2003, the relevant INS functions discussed in this report were incorporated into U.S. Citizenship and Immigration Services (CIS), part of DHS. However, some relevant databases were retained by other DHS agencies. In this report, reference will be made to INS when discussing events that occurred prior to March 1, 2003. Reference to DHS and CIS will be made when talking about the present and the future.

in the evaluation report and, where feasible, provides information on how successful the Federal government has been in these efforts. It also includes additional measures planned for implementation prior to the December 2004 program expansion to employers who volunteer to participate anywhere in the United States.

HOW THE BASIC PILOT VERIFICATION SYSTEM WORKS

The Basic Pilot program builds upon the employment verification procedures specified by the Immigration Reform and Control Act (IRCA) of 1986. Implementation of this legislation requires that all newly hired employees and their employers complete I-9 forms and that employers review specified documents establishing the identity and work-authorization status of new employees. In the Basic Pilot program, participating employers enter the I-9 form information about their newly hired employees into a computer and electronically transmit this information to the Federal government.

Information submitted by employers is automatically compared with information on SSA's primary database, the Numerical Identification File (NUMIDENT). This database contains information on name, date of birth, and citizenship status of persons issued Social Security cards, which enables SSA to confirm work authorization for U.S. citizens and some noncitizens who are permanently work authorized. If the information submitted by the employer matches SSA data, and SSA records confirm work-authorization status, the employer is immediately notified that the employee is verified. If the employer-submitted information is inconsistent with SSA information, the employer is immediately notified that the employee has received a tentative nonconfirmation finding. An SSA tentative nonconfirmation is also issued when the person attests to being a U.S. citizen but SSA records indicate that the person is a noncitizen with unknown work-authorization status.

If employer-submitted information and SSA data are consistent for employees attesting to being noncitizens but the SSA database does not permit confirmation of work-authorization, the employer-submitted information is next automatically matched against CIS's Customer Processing System (CPS). If the CIS automated match is adequate to establish work-authorization, the employee is verified immediately. If information on the CPS is inconclusive, Immigration Status Verifiers, who are field office records experts assigned to verify status, check other DHS² information to determine work-authorization status. If the Immigration Status Verifier is able to verify work-authorization, the employer is typically notified within 1 day of case submission that the employee has been verified. If the Immigration Status Verifier cannot verify work-authorization without additional information, CIS issues a tentative nonconfirmation.

When tentative nonconfirmations are issued, employers are required to notify their employees of the finding. The employees have the right to contest tentative nonconfirmation findings by contacting SSA or CIS, as appropriate, to resolve any inaccuracies in their records. This contesting process is normally limited to 10 Federal workdays. During this time, employers are

² DHS rather than CIS is used in the text when the information or databases referred to include those administered by other DHS agencies.

not permitted to take any adverse actions against employees, based on the finding. When employees contest their tentative nonconfirmation findings, CIS informs their employers of the employees' work-authorization status. When employees do not contest their findings within the allotted time, they receive final nonconfirmation findings. Employers are supposed to terminate the employment of employees in three circumstances: when employees indicate that they do not wish to contest the finding, when employees are found not to be work-authorized, or when employees receive final nonconfirmation findings.

PROBLEMS IDENTIFIED IN THE EVALUATION AND ACTIONS TO CORRECT THEM

The pilot program evaluations, conducted by external evaluators, concluded that the pilot reduced unauthorized employment among participating employers by permitting employers to determine whether the information provided by employees on I-9 forms is consistent with information on SSA and DHS databases. However, the evaluations also found a number of program deficiencies and recommended that the Federal government address them prior to expansion of the program.

Three primary problems were noted.³ First, the tentative nonconfirmation rate⁴ was unacceptably high for foreign-born *work-authorized* employees and was higher than desirable for U.S.-born employees. This created burdens for employees and employers, increased verification costs for the government, and led to unintentional discrimination against foreign-born persons. Second, lack of full employer compliance with pilot requirements reduced its effectiveness in deterring unauthorized employment and contributed to discrimination against foreign-born employees. Third, most employers did not consider the pilot programs to be attractive, limiting the extent to which a volunteer program could reduce unauthorized employment on a national basis.

ERRONEOUS TENTATIVE NONCONFIRMATION RATES

The most serious pilot deficiency noted by the evaluation of the electronic employment verification programs was that they too frequently resulted in work-authorized employees receiving tentative nonconfirmations. Employers, employees, and the Federal government incurred costs in the process of resolving these erroneous findings. Since foreign-born employees were more likely to receive erroneous tentative nonconfirmations than were U.S.-born employees, these accuracy problems were also a source of unintentional discrimination against foreign-born employees. The evaluations recommended against expansion of automated employment verification prior to addressing this problem.

The evaluations discussed three factors contributing to erroneous tentative nonconfirmations. First, some erroneous tentative nonconfirmations resulted from inaccuracies in the Federal

³ The list of problems reflects results from the Basic Pilot evaluation as well as subsequent evaluation efforts on the pilot programs.

⁴ Tentative nonconfirmation of work authorization is the initial electronic response returned by the pilot system when an employee's work authorization status cannot be immediately confirmed.

databases used to verify work-authorization due, in large part, to delays in entering data on newly arriving aliens with work authorization and updating the databases to reflect changes in relevant employee information, such as name changes or changes in work-authorization status. Second, reliance on Immigration Status Verifiers to re-input employer-submitted information when checking multiple INS databases other than the primary verification database created the potential for additional data entry errors. Third, employers sometimes made errors inputting data into the automated system. Although some data input errors are inevitable, the use of commonly available editing software could prevent some of these errors.

MEASURES TO ADDRESS ERRONEOUS TENTATIVE NONCONFIRMATION RATES

Improving Federal Database Accuracy

Since the completion of the Basic Pilot evaluation data collection in 1999, both SSA and DHS have taken steps to improve the accuracy of the Federal databases used in the Basic Pilot program to verify employer-entered data. This section describes these improvements.

SSA Improvements

Over time, SSA has increased the amount of information it collects that is relevant to verifying work-authorization status. In November 1980, SSA started collecting citizenship status of applicants for Social Security Numbers (SSN) and, in 1990, started collecting information on whether noncitizens were lawful permanent residents.⁵ Due to these changes, increased information about the work-authorization status of foreign-born employees is continually becoming available in the SSA database.

In early FY 2002, SSA focused improvement on processing Social Security numbers in two areas: encouraging their field offices to make better use of systems screening capabilities by processing enumeration applications online, and conducting a variety of training initiatives which focused on preventing the most frequent errors made by SSA employees in the enumeration process. SSA quality control data indicates that their efforts have resulted in increased data accuracy. In 1998, of the 12.5 million SSN applications processed, 91 percent were found to be free from error. In 2001, over 93 percent of the 14.6 million SSN applications processed were found to be free from error.⁶

Recent analyses of the Basic Pilot transaction database confirmed that SSA efforts have resulted in increased accuracy of the SSA automated database check. Among cases that were authorized at any point by the Basic Pilot, the percent of cases authorized by SSA during the SSA automated matching process increased from 83.7 percent in 1999 to 88.4 percent in 2003.⁷ The improvement was most dramatic for foreign-born noncitizen employees. Among foreign-born

⁵ In 1995, SSA began notating its systems for refugees and in 2001, asylees. Both of these classifications, like lawful permanent residents, are work-authorized incident to status.

⁶ SSA changed the method by which their quality reports were done in FY2002, so that comparable data for FY02 and FY03 do not exist.

⁷ This report examines Basic Pilot results for cases ever authorized rather than all cases in order that database accuracy trends are not confounded by any trends in the percentage of non-authorized workers verified.

noncitizens authorized at some point by the Basic Pilot, the percentage electronically authorized by SSA increased from 37.2 percent to 48.8 percent, while the corresponding percentages for foreign-born citizens increased from 83.6 percent to 88.6 percent and the percentages for U.S.-born employees increased from 99.5 to 99.8 percent.

SSA is currently piloting a method of verifying SSNs for employers called Social Security Number Verification Service (SSNVS) that may prove useful in further improving data accuracy. While SSA has provided verification services for employers by phone, diskette, and paper for over a decade, SSNVS is Internet-based and stems in part from the employers' request for an online service available 7 days a week. If evaluation of the SSNVS pilot indicates it is successful, expansion of this program will provide SSA with more updated employee information.

DHS Improvements

DHS systems were designed before status verification was an operational need, and substantial efforts have been required to adapt these systems for verification purposes. The former INS instituted a number of efforts to ensure that the data about noncitizens is current, complete, and input into relevant agency systems quickly. These efforts were intensified following the terrorist attacks of September 11, 2001, and DHS continues this work. Many of these efforts have focused on improving the quality of the data available in the DHS databases that provide the information used in the verification process, by increasing the accuracy of existing DHS records, expediting data entry for new lawful permanent residents and arriving nonimmigrants, and expediting data entry about changes in work-authorization status. In addition, CIS has made improvements in how information from operational databases is incorporated into the CPS, which is used for the automated Basic Pilot verification check.⁸

Increasing the accuracy of existing CIS records

CIS has taken major steps to increase the completeness of its paper and electronic records system. In FYs 2000 and 2001, the former INS consolidated its current paper A-file records at a new National Records Center. CIS is presently augmenting this effort by transferring all nonclassified retired A-files to the National Records Center. As part of these consolidation efforts, files are reviewed and missing or inaccurate information is added or corrected in the core CIS database used for verification. Additionally, special efforts have been made to interfile loose documents that belong in these files and update the automated records accordingly. Since the inception of these consolidation efforts, more than 5 million records have been updated.

DHS has also taken steps to increase the accuracy of its electronic records. The accuracy of NIIS has been improved by developing a capability to correct errors in the database, which previously had not been possible. Initiatives have also been taken to ensure that status codes used in DHS databases translate into current work-authorization status in the CPS. These changes facilitate immediate electronic verification.

⁸ The CPS replaces the ASVI database referred to in the evaluation report. As was true for ASVI, data in the CPS are extracted from core DHS databases to ensure the security and confidentiality of information not needed for verification purposes.

Expediting data entry for persons entering the United States

DHS has mounted efforts to expedite submission of data on immigrants and nonimmigrants from ports of entry and field offices for data entry into its automated systems. At the time the pilot evaluations were conducted, there was typically a 6 to 9 month lag between an immigrant's arrival in the United States or adjustment to permanent resident status and availability of data for verification purposes. Post 9/11 instructions to field offices require that immigrant visas or adjustment documentation be sent immediately to the appropriate CIS service center for data entry. Once the case is received at the service center, the contractor responsible for data entry is required to input the data within 3 days. Data on new immigrants are now typically available for verification within 10 to 12 days of an immigrant's arrival in the United States. This summer CIS is testing changes to expedite the adjustment of status process for many family-based immigrants. The changes being tested are expected to make data for those cases available for verification purposes almost immediately.

Similarly, efforts have been made to accelerate data entry on nonimmigrant arrivals. When the Basic Pilot evaluation was conducted, nonimmigrant data were taking in excess of a month to be input into the nonimmigrant (NIIS) database. New timeliness and quality standards put into place in a November 2001 contract has resulted in these data being available for verification within 11 to 14 days of arrival. Work is underway to reduce this time to a week or less. For many cases this standard has already been met by use of scanning technology and secure electronic transmission of nonimmigrant records deployed at contract facilities located near the largest volume airports in Miami, Los Angeles, New York, San Francisco, and Honolulu which account for over half of nonimmigrant admissions.

Expediting data entry for changed work-authorization status

CIS has also worked to increase the timeliness and availability of temporary work-authorization information in its systems, which was one of the most problematic areas identified by the evaluations. Timeliness of data entry is quickest for work-authorization documents processed at service centers, since these centers enter information into the database as part of the work-authorization case processing. While in 1999 less than half of all employment authorization documents were issued by service centers, over three-quarters of these cards are now issued through this centralized process, and this proportion is continuing to rise.

CIS has also increased the timeliness and completeness of data entry for the smaller portion of work-authorization cards processed in local field offices. Information on these work-authorization approvals is now sent electronically for data entry rather than being sent through the mail on computer disks. Beginning this summer, further improvements will expedite processing of many field office work authorizations and make employment authorization information available for verification purposes within 1 to 2 days of action on the case.

Improving how data are incorporated into the Customer Processing System

Recently, CIS has made changes to the CPS to increase the proportion of verifications that will clear electronically. Data corrections made to NIIS are now downloaded to the CPS on a daily basis. Additionally, logic errors recently found in the old verification software have been

corrected, which will substantially increase the proportion of automatic verifications of persons with employment authorization documents.

Effects of changes addressing data accuracy

Analysis of the Basic Pilot database confirms that the accuracy of the automated CIS database check has improved. Among the cases that went to CIS for authorization and were authorized at some point in the process⁹, the percent of cases authorized by the database match increased from 58.0 percent in 1999 to 82.6 percent in 2003. Combining the improved SSA and CIS accuracy checks indicates that among cases found to be work-authorized at some point in the process, the percent found work-authorized through an automated match increased from 92.6 percent in 1999 to 97.4 percent in 2003.

Reducing Immigration Status Verifier Data Entry Errors

The evaluation recommendation to provide Immigration Status Verifiers with a means to electronically check databases without manually reentering Form I-9 data each time is in the process of being implemented. In 2002, CIS provided Integrated Common Interface browsers to Immigration Status Verifiers conducting pilot verifications. This permits them to query multiple databases with a single entry screen. CIS is currently working to ensure that browsers will be uniformly available to all Immigration Status Verifiers by this summer.

Reducing Employer Data Entry Errors

CIS has incorporated measures expected to substantially reduce employer input errors into a new approach to the Basic Pilot using the Internet, the Web-Basic Pilot program, currently scheduled for implementation this summer. These features include real-time edit checks that will alert employers to obvious or probable mistakes as they are being made. For example, the Web-Basic Pilot program creates an error message if the employer does not input the correct number of digits into the SSN and alien number fields. Other useful features of the Web-Basic Pilot program include clearer instructions, links to instructions for data entry, and links to on-line resources such as the employer handbook.

REDUCING ERRONEOUS TENTATIVE NONCONFIRMATION RATES

As expected, the increase in the percent of cases authorized automatically resulted in a decrease in the estimated percent of work-authorized employees who received tentative nonconfirmations. This percent declined from 2.0 percent in 1999 to 1.4 percent in 2003. Among U.S.-born employees authorized by the Basic Pilot, there was an improvement in the percent of cases authorized without a tentative nonconfirmation between 1999 and 2003 from 99.5 percent to 99.8 percent. The corresponding rates for foreign-born citizens and noncitizens were also both higher in 2003 than in 1999.

⁹ Matched either automatically, through a manual search by an Immigration Status Verifier, or verified during the process of resolving a tentative nonconfirmation.

EMPLOYER NONCOMPLIANCE

A second deficiency identified in the IIRIRA pilot program evaluations was that employers did not consistently comply with pilot requirements. Noncompliance can decrease the effectiveness of the pilot programs in preventing unauthorized employment, result in violations of employee privacy and due process rights, and contribute to discrimination against foreign-born employees. The evaluations identified two sources of employer noncompliance – employer confusion about pilot procedures and employers’ willful noncompliance with burdensome requirements. The evaluations recommended addressing employer confusion by improving the training materials provided to employer staff and by providing Management Information System (MIS) reports that permit employers to monitor themselves. To address willful noncompliance, the evaluations recommended consideration of Federal compliance measures, such as monitoring employers using MIS reports and on-site auditing of employers.

MEASURES TO ADDRESS EMPLOYER NONCOMPLIANCE

Improving Employer Training

CIS has modified the Web-Basic Pilot employer training materials in ways expected to reduce employer compliance problems attributable to their misunderstanding of the program requirements. These modifications include system-generated reminders to employers of their responsibilities under the pilot program. For example, users are required to confirm that they have notified employees of tentative nonconfirmation findings before they are permitted to input a referral date. These reminders should reinforce the more formal on-line training provided to employers. The Web-Basic Pilot also requires users to complete the on-line training prior to being given access to the system.

Instituting MIS Reports for Employers

The Web-Basic Pilot includes production of MIS reports that participating establishments can use to monitor themselves. This use should reduce inadvertent employer noncompliance. For example, employers can request information on the status of tentative nonconfirmation cases or information on closed cases. These reports should permit staff to identify and fix potential problems, such as multiple transmissions of cases or cases that have not been properly closed.

Starting this fall, headquarters staff of multi-site employers will be able to obtain reports for all of their establishments, permitting them to monitor and spot misunderstandings or misuse of the system. For example, employer headquarters should be able to determine whether the number of verifications made by an establishment is consistent with its screening of all newly hired employees and only newly hired employees. This new capability is expected to reduce employer non-compliance.

Enhancing Federal Monitoring of Establishments

In addition to providing MIS reports for employers, the Web-Basic Pilot provides CIS with MIS reports that permit the agency to monitor establishments. For example, CIS can use the “User Audit Report” to identify employers with unusually low rates of referral to SSA or CIS or unusually high “no show” rates of referred employees. Such employers may not be properly following pilot requirements on treatment of employees receiving tentative nonconfirmation

findings. These monitoring reports will be especially useful if used in conjunction with other compliance measures. Such measures include making the existence of the Federal monitoring reports known to employers, contacting employers that appear to frequently violate procedures to inform them of the problems encountered and to explain the correct procedures, and terminating participation in the program for employers with flagrant procedural violations.

PILOT ATTRACTIVENESS TO EMPLOYERS

The more attractive employers find the Basic Pilot, the more likely they are to participate. The greater the participation, the more effective the program will be at reducing unauthorized employment. The IIRIRA pilot evaluations, however, indicated that among the employers having an opportunity to sign up for the Basic Pilot, only a small percent actually did so. Furthermore, some employers that signed up for the program did not install the software needed for participation, installed the software but never used it, or used the software only sporadically. These observations, combined with reports of similar problems from SSA and former INS staff involved with recruitment for the CAVP and MRDP, led to the conclusion that only a minority of all employers consider electronic employment verification, as implemented in these pilot programs, to be an attractive option.

The pilot evaluations indicated that the pilot programs could be made attractive to more employers by making the software more user-friendly, including incorporating edit checks so that errors could be detected at the time of initial submission, and by providing management information reports. Other measures likely to improve attractiveness of the pilot program include improving database accuracy, thereby reducing the time employers need to devote to verifying employees and other problems engendered by inaccurate findings.

MEASURES TO ADDRESS PILOT ATTRACTIVENESS TO EMPLOYERS

The Web-Basic Pilot program design incorporates many of the specific software and hardware recommendations included in the evaluation reports. By the very nature of its Web-based access, it is more user-friendly and does not require specialized hardware. It will also be available 23 hours a day,¹⁰ 7 days a week to accommodate the needs expressed by some employers. A preliminary indication that these changes make the Basic Pilot program more attractive to employers is seen in the fact that when CIS contacted employers using the Basic Pilot system, 85 percent of them reported that they wanted to switch to the Web-Basic Pilot immediately. Many of the remaining 15 percent were waiting for a response from their corporate Headquarters or were waiting until there was time for CIS to work out any initial implementation problems.

ADDITIONAL CIS PLANNED IMPROVEMENTS

CIS is currently assessing whether it would be cost effective to reduce erroneous tentative nonconfirmations by modifying the pilot verification procedures. Currently, if the system cannot match information for employees attesting to being work-authorized noncitizens against the SSA database, the Basic Pilot system issues a tentative nonconfirmation without checking CIS data.

¹⁰ The system is shut down for 1 hour each day for maintenance.

However, a check of the CIS data for these employees would permit electronic verification of some of them. For example, if the employer made a data input error in entering the SSN but not in entering the alien number, CIS would be able to verify the case. This analysis will be completed this summer.

In addition, CIS is working to increase the number of databases feeding into the CPS in order to increase the number of cases that can be verified immediately and eliminate the need for Immigration Status Verifiers to conduct independent checks of these systems to determine whether certain employees are work-authorized. CIS will add the Student and Exchange Visitor Information System (SEVIS) and an extract of the Computer-Linked Application Information Management Systems (CLAIMS) to the CPS. These modifications are scheduled for completion this winter

Over the next year, CIS will continue adding technical enhancements to the Web-Basic Pilot making it more attractive and user-friendly for employers. One way to make the pilot more attractive to employers is to reduce the amount of data entry required. Currently, most employers key-in information on their newly hired employees twice, once into their human resources personnel system and then again into the Basic Pilot program. By the spring of 2005, a new CIS enhancement will eliminate the need for duplicate data entry. Following technical guidance issued by CIS, employers can organize their personnel system to arrange multiple employee records in a format that they can then import directly into the Basic Pilot system for verification by SSA and CIS. Also, by the summer of 2005, CIS plans to test electronic signatures to allow CIS, SSA, and employers to electronically sign such documents as the Memorandum of Understanding. This will significantly reduce the amount of paperwork required for participation in the Basic Pilot.

CIS PILOT EXPANSION PLAN

CIS anticipates a relatively modest increase in verification workload when the Basic Pilot becomes available to all U.S. employers in December. IIRIRA pilot programs have already operated in 12 designated States accounting for about half the U.S. population and about three-quarters of the foreign-born and estimated undocumented populations. Additionally, employers are currently participating in the pilot in most States, since companies are permitted to use the pilot in all of their establishments, assuming that at least one of the establishments is in a designated pilot State. CIS has verification capacity to accommodate the anticipated volume of new verifications that will result from expansion of the Basic Pilot to all 50 States.

CIS plans to increase interest for volunteer participation in the Basic Pilot within new areas by announcing its availability in a Federal Register notice well in advance of the December 1 start date. Additionally, CIS will use press releases, Website and Internet announcements, faxes and emails targeted to employer groups and chambers of commerce, and participation in payroll and other employer-related conferences to advertise the expansion of the program. SSA will advertise the program on its Website and in its publications as well.

CIS also plans to arrange for an independent evaluation of the revised Basic Pilot program. This evaluation is expected to include assessments of the Web-based approach to employment verification, the impact of the 50-State expansion, whether the recommended program changes

described in this and prior evaluation reports have had the desired effects, and whether additional programmatic improvements would further strengthen the program.

SUMMARY

Available information shows that CIS and SSA have made considerable progress toward ameliorating the problems identified in the Basic Pilot evaluation. SSA and CIS have made large strides in addressing the data accuracy problems noted by the pilot evaluations. Inaccuracies in existing records have been substantially reduced and data entry for new information has been expedited. Immigration Status Verifiers are being provided with the ability to query multiple databases more efficiently. To reduce data input errors, the Web-Basic Pilot program incorporates edit checks to detect common employer input errors. Between 1999 and 2003, there has been a significant increase in the percentage of work-authorized employees verified during the automated matching process and a decrease in the percent of work-authorized employees receiving tentative nonconfirmations. Further improvements are expected after the implementation of the Web-Basic Pilot program this summer.

Improving employer compliance with pilot requirements is expected from modifications implemented in the Web-Basic Pilot program and from management information reports that will be added to the Web-Basic Pilot in the fall. CIS also anticipates that the new Web-Basic Pilot program will make the program more attractive to employers, since it addresses many of the major complaints voiced by employers in the Basic Pilot evaluation.

Over the next year, CIS plans to add additional technical and process improvements to the Web-Basic Pilot. CIS also plans to increase the number of databases available on the Customer Processing System, thereby increasing the number of cases verified immediately. In addition, CIS and SSA are looking at ways of modifying current pilot verification procedures to reduce the number of erroneous tentative nonconfirmations issued to foreign-born employees.

The program enhancements discussed in this report go a long way towards addressing the problems noted in the Basic Pilot evaluation. No problems are currently anticipated that would prevent CIS from opening the Basic Pilot program to all U.S. employers by December 1. Notwithstanding the program enhancements that have been made or are planned for implementation in the near future, CIS and SSA will continue their efforts to increase data quality and make other operational improvements in the Web-Basic Pilot program. This future work will be guided by an independent evaluation of the progress and performance of the Web-Basic Pilot.