March 10, 2021

Tracy Renaud
Senior Official Performing the Duties of the Director
United States Citizenship & Immigration Service
Department of Homeland Security
20 Massachusetts Avenue, NW
Washington, D.C. 20529

Re: Stakeholder Assistance in Fast-Tracking USCIS Digitization

Dear Ms. Renaud,

We write on behalf of the American Immigration Lawyers Association (AILA), the world's largest immigration bar organization. You may already know that over 25% of cases filed with USCIS are prepared by our 15,000+ members, most of whom use case management systems (CMS) to prepare their cases electronically. Though attorneys have digitized the data and documents, USCIS offers them no way to upload most matters, giving the agency manual data entry burdens and processing delays. We are reaching out now to share with you efforts we have undertaken to help you solve this and other issues readily addressed by technology.

By way of background, in 2019, the USCIS Ombudsman made a suggestion at AILA's first Immigration Technology Summit in 2019. He gathered the leaders of the largest commercial immigration CMS companies, asking if they would unite in a common Extendible Markup Language (XML) to support USCIS's efforts to intake electronic data. This would vastly speed up your agency's efforts to codify the intake rules for data and documents submitted, making up time for backlogs caused by paper-based processes during the pandemic (https://www.uscis.gov/news/alerts/uscis-lockbox-updates).

We are happy to report that we have formed the Technology Advisory Group (TAG), which enables us to fulfill this request. This group includes all of the top case filing systems, including proprietary and commercial technologies. Each of them confidentially submitted their numbers to AILA so that we could **confirm to you that, together, these systems opened over two million cases in 2020.** For perspective, this is approximately 25% of all applications, petitions, and requests for benefits received by USCIS in FY2020, according to the 2020 USCIS Statistical Annual Report.

In committing to common data standards, we aim to expedite USCIS's digital intake capabilities, as this is your assurance of wide adoption and minimal bugs or misfires in development. Please see our suggestions below. AILA and its technology partners share your interest in electronic processes that are transparent, efficient, and user-friendly. As an example of our experience in collaborating with DHS, some of us helped create requirements

years ago for web services agents to properly develop, integrate, and maintain their interface with the E-Verify system. We also facilitated USCIS engagement with stakeholders on the new H-1B electronic registration process starting in mid-2019. USCIS developers would have saved significant re-engineering time if they'd looped in the major AILA technology partners earlier in the feedback process. To its credit, USCIS has relied on AILA's ability to raise technical issues to timely resolve broad problematic trends, helping to keep the H-1B registration and filing process on track. For instance, we flagged issues such as:

1. The PDF version of Form G-28 (Notice of Entry of Appearance as Attorney or Accredited Representative) was misidentifying attorneys as not eligible to practice law; and
2. H-1B Receipt Notices were erroneously listing the authorized signatory as the petitioner instead of the U.S. employer.

We have continued to provide suggestions for improvements to the registration system, most recently in correspondence with Joseph Edlow, Director for Policy.

Developing Secure API Data Standards – Initial Suggestions

With many hours volunteered by seasoned immigration technologists (attorneys and engineers) serving on our TAG, AILA offers the following initial suggestions to USCIS as areas of mutual interest to enhance the transition of paper-based applications to a digital, if not completely paperless, user platform. If your development team is already planning on many or most of these best practices, forgive us for duplicating, but that would be a positive sign of our alignment:

1. The API should be RESTful
   - A URL identifies a resource.
   - URLs should include nouns, not verbs.
   - Use plural nouns only for consistency (no singular nouns).
   - Use HTTP verbs (GET, POST, PUT, DELETE) to operate on the collections and elements. HTTP verbs, or methods, should be used in compliance with their definitions under the HTTP/1.1 standard
   - You shouldn't need to go deeper than resource/identifier/resource.
   - Put the version number at the base of your URL, for example http://example.com/v1/path/to/resource.
   - URL v. header:
     – If it changes the logic you write to handle the response, put it in the URL.
     – If it doesn't change the logic for each response, like OAuth info, put it in the header.
   - Specify optional fields in a comma separated list.
   - Formats should be in the form of api/v2/resource/{id}.json
2. The API should accept and return JSON or JSONP.
3. Requests should be made via Hypertext Transfer Protocol Secure (HTTPS).
4. An API key should be required for authorization.
5. New versions of the API should be numbered by integers and the API should be maintained at least one version back.

6. Error responses should include a common HTTP status code, message for the developer, message for the end-user (when appropriate), internal error code corresponding to a specific internally determined ID, and links where developers can find more information.

We also have recommendations for security protocols that USCIS can require of any technology providers seeking to interface with your systems. For instance, in the I-9/E-Verify arena, the safest practice is to ensure that any PII taken on a mobile device (like a photo of a driver's license or passport) is saved directly to the system and is not stored on the device. These simple rules go a long way to keep everyone compliant.

Request for Regular Stakeholder Engagement

In light of our mutual interest in ensuring the effective electronic delivery of customer-oriented immigration benefit and information services, we request a meeting to discuss these common objectives and how we can collaborate on your continuing digitization efforts. We believe we can help your agency make its biggest strides ever at modernization. AILA was established in 1946, so we've seen a lot of things, but Covid-19 helped us realize how critical it is that the USCIS modernize. In our 75th year, we aim to partner with you more than ever before to help ensure the success of your digital immigration processing initiatives.

Thank you for your consideration. If you have any questions or thoughts, or want to schedule a meeting, we welcome you to contact at Reid Trautz (202) 507-7647 or by email at rtrautz@aila.org or Sharvari (Shev) Dalal-Dheini at (202) 507-7621 or by email at sdalaldheini@aila.org.

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION

TECHNOLOGY ADVISORY GROUP MEMBERS

Prima	Lawmatics
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Cc: Nathan Stiefel, Deputy Ombudsman, Office of the Citizenship and Immigration Services Ombudsman