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**Immigration - Structural  
Reforms [5]**

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Final Report

ORGANIZATION DESIGN

**IMMIGRATION AND  
NATURALIZATION SERVICE**

McLean, VA  
February 23, 1998

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

**BOOZ·ALLEN & HAMILTON**

Immigration - structural reform

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## **I. INTRODUCTION**

Introduction ...

**BOOZ-ALLEN & HAMILTON (BA&H) WAS ENGAGED BY THE DEPARTMENT OF JUSTICE TO DEVELOP RECOMMENDATIONS ON A NEW ORGANIZATION STRUCTURE FOR THE INS**

- Assist the agency in responding to a requirement in its FY98 appropriations bill to submit a restructuring plan by April 1, 1998
- Detail alternative structures designed to address perceived performance problems
- Benchmark other agencies with similar dual mission issues
- Outline high-level next steps for moving forward

Introduction ...

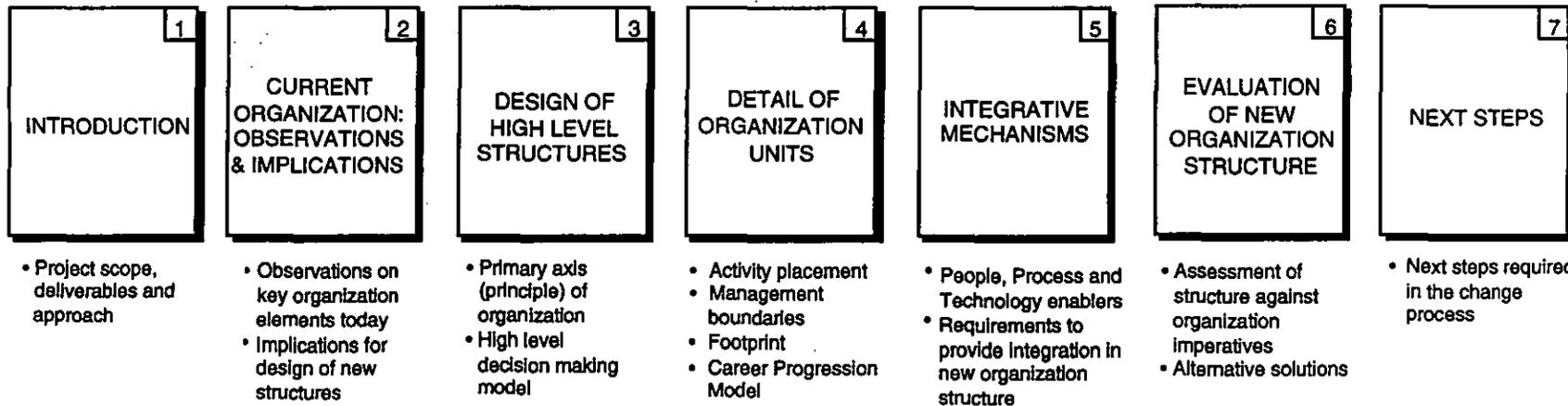
**WE RELIED HEAVILY UPON PREVIOUS EXTERNAL ASSESSMENTS OF INS PERFORMANCE AND INTERVIEWS WITH KEY INTERNAL INS STAFF TO COMPLETE THIS ANALYSIS**

- Interviewed more than 80 INS leaders and staff members at headquarters, regional and district offices including site visits to the field
- Performed a thorough review of findings and recommendations from the Commission on Immigration Reform (CIR)
- Reviewed other re-organization proposals on the table for the INS—internally generated and those created by other external stakeholders (OMB, Congressman Reyes' Bill)
- Coordinated efforts and leveraged findings of other consulting and planning teams
  - Interfaced with the Logistics Management institute (LMI) team on development of an integrated interior enforcement strategy and Coopers & Lybrand on reengineering the naturalization process
  - Consulted with internal INS project leaders working on related initiatives (e.g. career path and compensation effort, administrative center restructuring)
- Leveraged our experience in organization redesign work with 1) commercial clients with best in class service operations capabilities and 2) professional law enforcement agencies
- Benchmarked three federal agencies to gain insight into organization alternatives—Social Security Administration, Customs and the FBI

Introduction...

**THIS DOCUMENT CONTAINS 7 SECTIONS AND PROVIDES SUPPORTING DOCUMENTATION AND ANALYSIS USED TO ARRIVE AT FINAL RECOMMENDATIONS**

**OUTLINE OF REPORT:  
ORGANIZATION RESTRUCTURING AT THE INS**

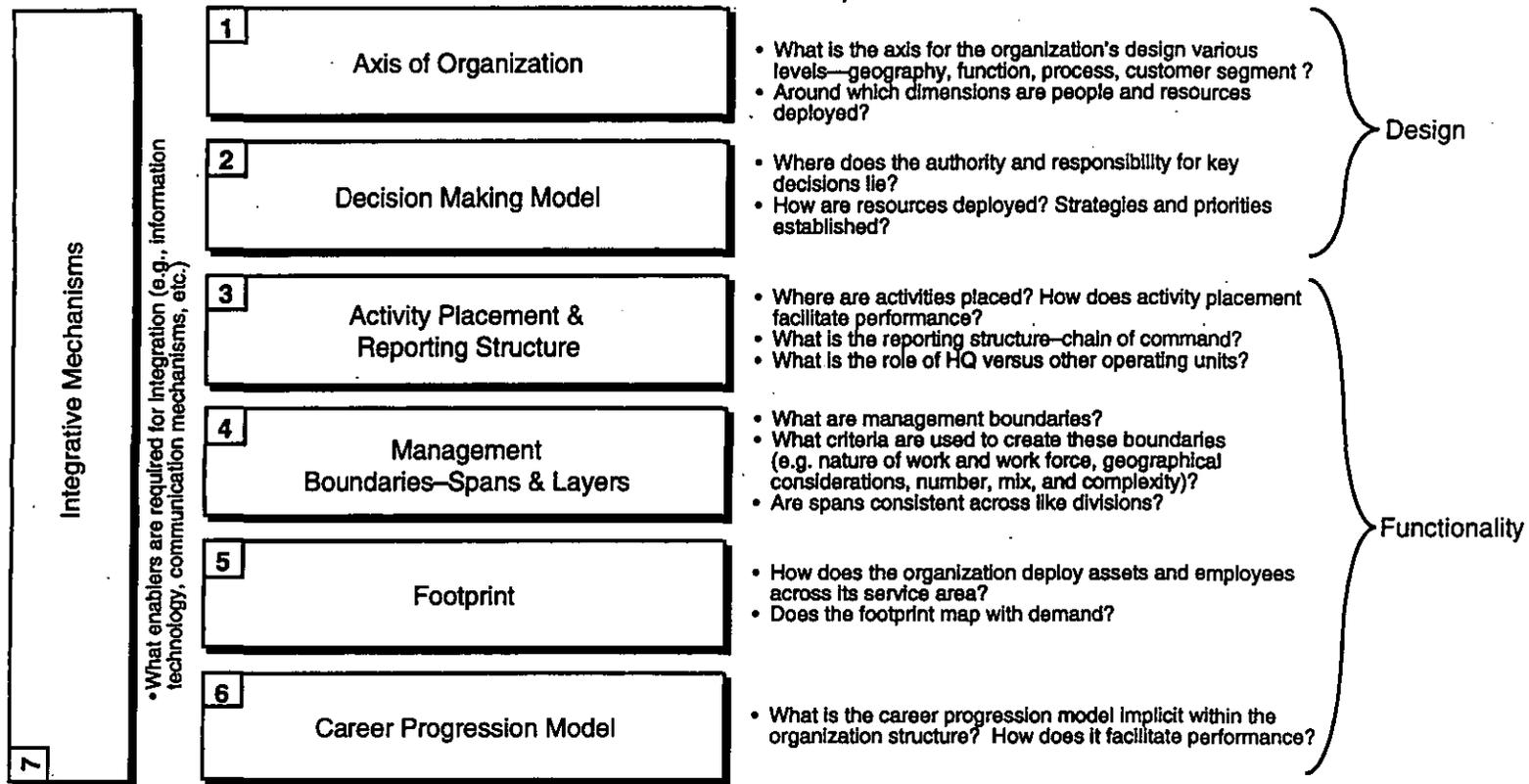


**A CONCISE EXECUTIVE SUMMARY CAN BE FOUND UNDER SEPARATE COVER**

**II. CURRENT ORGANIZATION STRUCTURE—  
OBSERVATIONS AND IMPLICATIONS**

**OUR EXTENSIVE EXPERIENCE IN ASSISTING ORGANIZATIONS TO CHANGE HAS LED TO THE DEVELOPMENT OF AN ANALYTICAL FRAMEWORK, WHICH WE APPLIED TO INS**

**KEY ELEMENTS OF ORGANIZATION DESIGN**



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Current Structure...Design Elements...

**OUR ANALYTICAL FRAMEWORK, ALONG WITH BEST PRACTICES INSIGHTS, SERVES BOTH TO ASSESS INS' CURRENT ORGANIZATION AND TO DEVELOP ALTERNATIVE DESIGNS**

**BEST PRACTICES IN ORGANIZATION DESIGN—CUSTOMIZED FOR THE INS**

<b>ORGANIZATION DESIGN ELEMENT</b>
1. Axis of Organization
2. Decision Making Model
3. Activity Placement & Reporting Structure
4. Management Boundaries—Spans and Layers
5. Footprint
6. Career Progression Model
7. Integrated Mechanisms



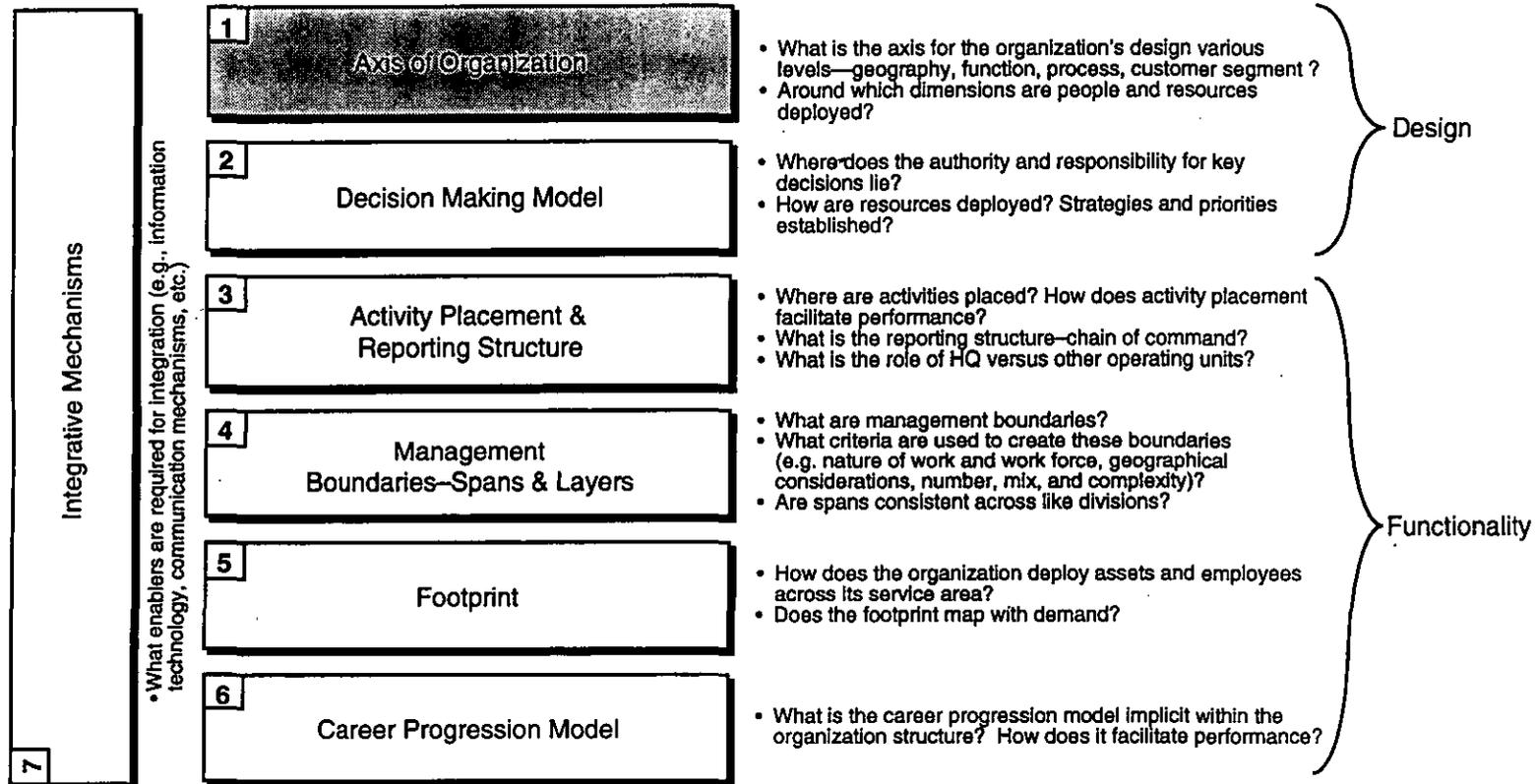
<b>DESIGN CRITERIA (DESIRABLE FOR GOOD SOLUTIONS)</b>
<ul style="list-style-type: none"> <li>• Direct link between agency mission/ strategy and organization</li> <li>• Ability to effectively perform a single mission with dual responsibilities</li> </ul>
<ul style="list-style-type: none"> <li>• Budget authority/ responsibility commensurate with accountability</li> <li>• Flexibility at the appropriate levels to meet external demands and performance expectations</li> </ul>
<ul style="list-style-type: none"> <li>• Scale advantages achieved where possible</li> <li>• Clear lines of authority and responsibility—single chain of command</li> <li>• Ease of access to INS services for external constituents (minimize complexity, single point of contact where desirable)</li> <li>• Minimal duplication of efforts, unnecessary hand-offs</li> </ul>
<ul style="list-style-type: none"> <li>• Reasonable and consistent spans of control for similar positions across the agency</li> <li>• Value-added management levels—unnecessary layers eliminated</li> </ul>
<ul style="list-style-type: none"> <li>• Organization structure supports local service and enforcement delivery where needed</li> </ul>
<ul style="list-style-type: none"> <li>• Clear career models and progression for INS employees</li> <li>• Knowledge, skills and abilities of individuals optimized</li> </ul>
<ul style="list-style-type: none"> <li>• Key points of integration and rationale identified and accounted for</li> </ul>

Current Structure...Design Elements...

**THIS SECTION PRESENTS OBSERVATIONS ON THE EFFECTIVENESS OF THE CURRENT ORGANIZATION AND HIGHLIGHTS IMPLICATIONS TO BE ADDRESSED IN REDESIGN**

- Presents each organization element along with an assessment of how the current structure fares against best practices (highlighted on the previous page)
- Links problems with the current organization to overall agency performance

## KEY ELEMENTS OF ORGANIZATION DESIGN

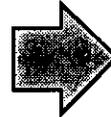


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**INS LACKS CLARITY IN ITS FUNDAMENTAL AXIS, OR PRINCIPLE, OF ORGANIZATION—  
DIFFERENT AXES RESULT IN CONFUSION OVER RESPONSIBILITY**

**SUMMARY: AXIS OF ORGANIZATION**

<b>OBSERVATIONS</b>
<ul style="list-style-type: none"><li>• Current INS organization does not have a primary axis of organization—multiple axes of organization exist<ul style="list-style-type: none"><li>– Geographic (e.g., Field Operations)</li><li>– Functional (e.g., Office of Management)</li><li>– Occupational (e.g., Programs)</li><li>– Process (e.g., Office of Naturalization Operations)</li></ul></li></ul>

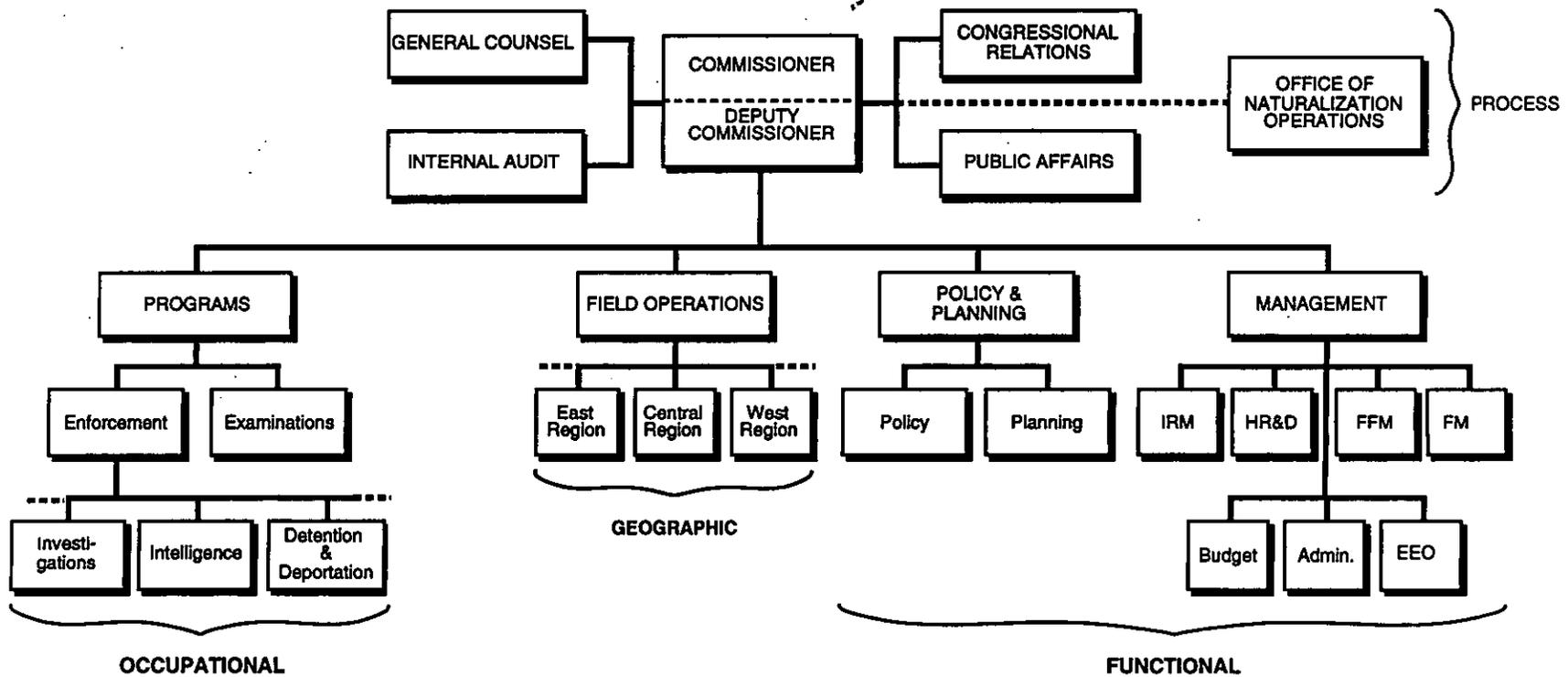


<b>IMPLICATIONS</b>
<ul style="list-style-type: none"><li>• No clear lines of responsibility for mission execution—serving legal immigrants and controlling illegal immigration</li><li>• Promotes confusion and, therefore, lack of accountability at the senior management level</li><li>• Promotes confusion and, therefore, ineffective follow-through at the grass roots<ul style="list-style-type: none"><li>– Inconsistent performance</li><li>– Delays action and processing</li></ul></li></ul>

Current Structure...Observations...

# THE CURRENT INS ORGANIZATION HAS MULTIPLE AXES OF ORGANIZATION WHICH BLUR LINES OF ACCOUNTABILITY

INS ORGANIZATION STRUCTURE 1/98

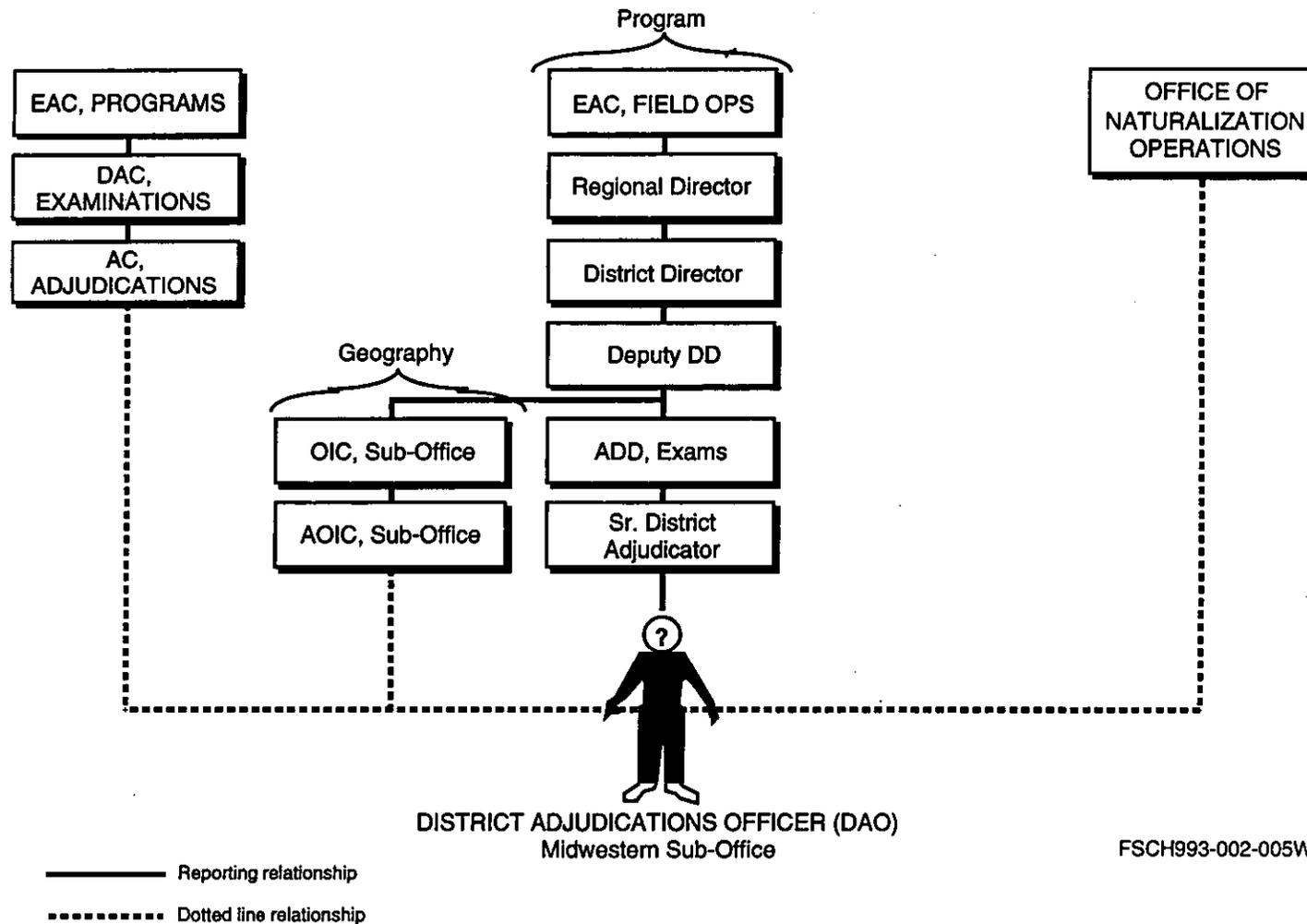


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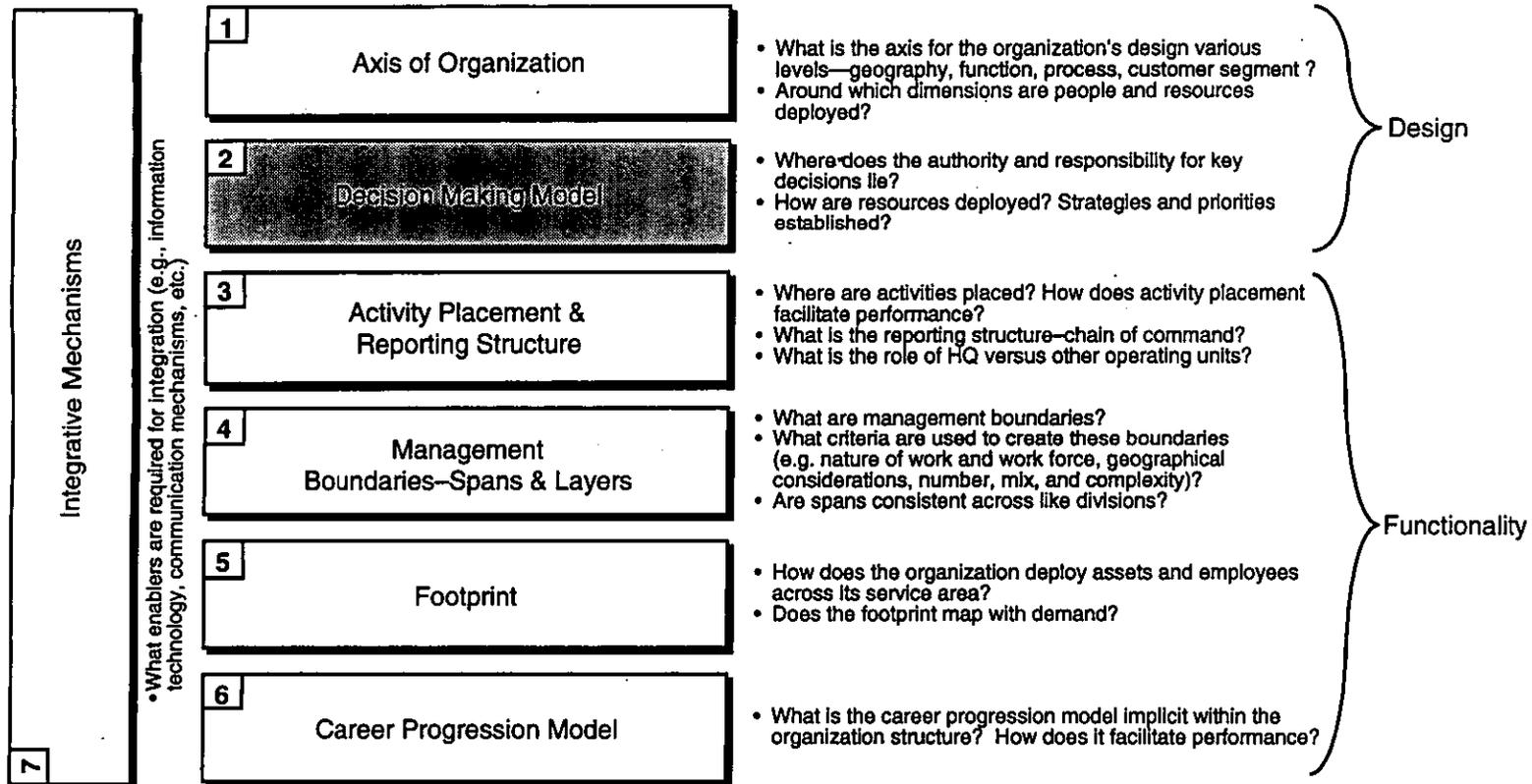
Current Structure...Observations...

**THIS STRUCTURE PROMOTES CONFUSION IN THE FIELD WITH OPERATIONS STAFF POTENTIALLY RECEIVING DIRECTION FROM A NUMBER OF DIFFERENT AREAS**

**POTENTIAL SOURCES OF DIRECTION: MIDWEST SUB-OFFICE**



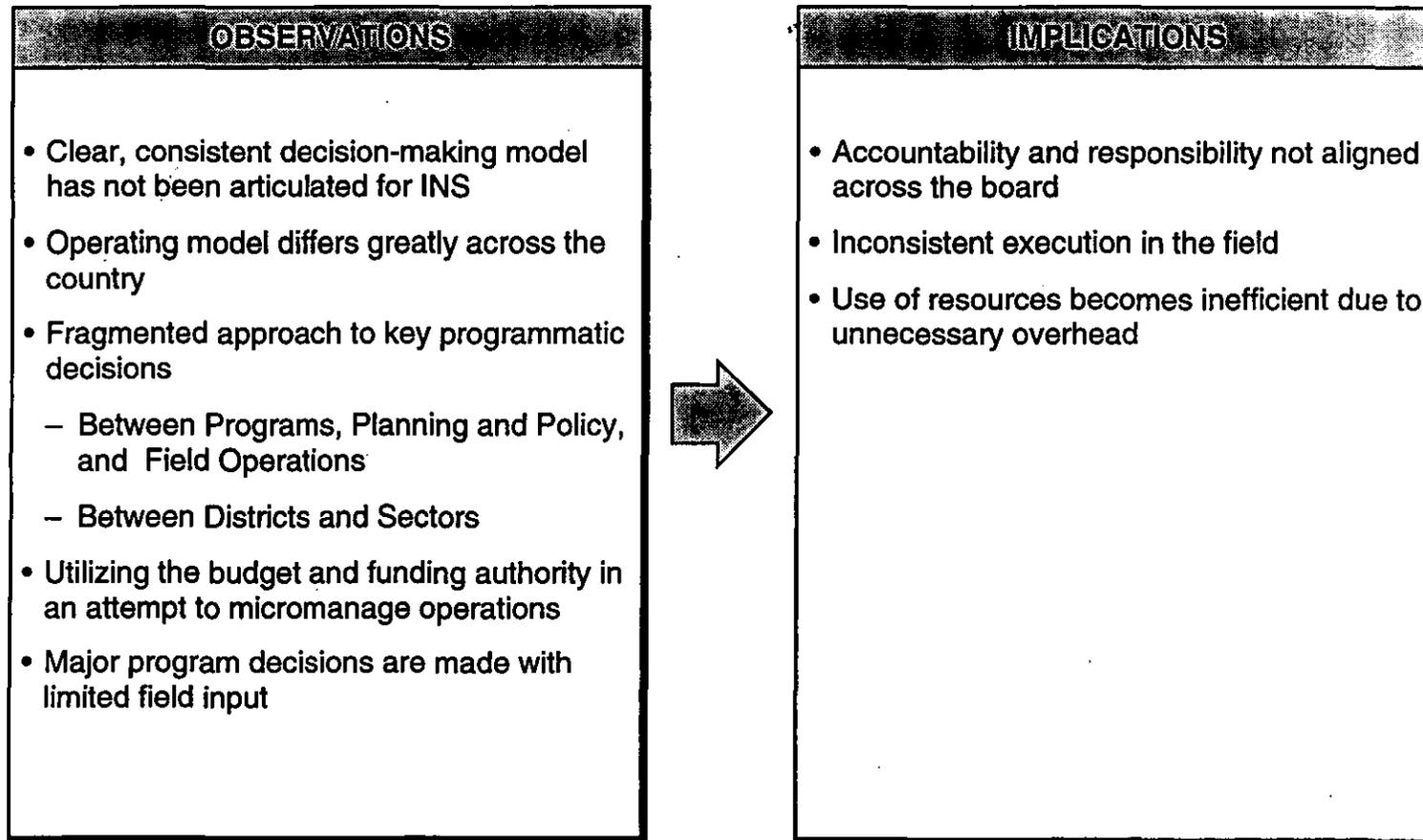
## KEY ELEMENTS OF ORGANIZATION DESIGN



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**THE DECISION MAKING MODEL—WHERE AND BY WHOM KEY DECISIONS ARE MADE—VARIES WITHIN THE INS, CONFUSING ACCOUNTABILITY AND PRODUCING INCONSISTENT EXECUTION IN THE FIELD**

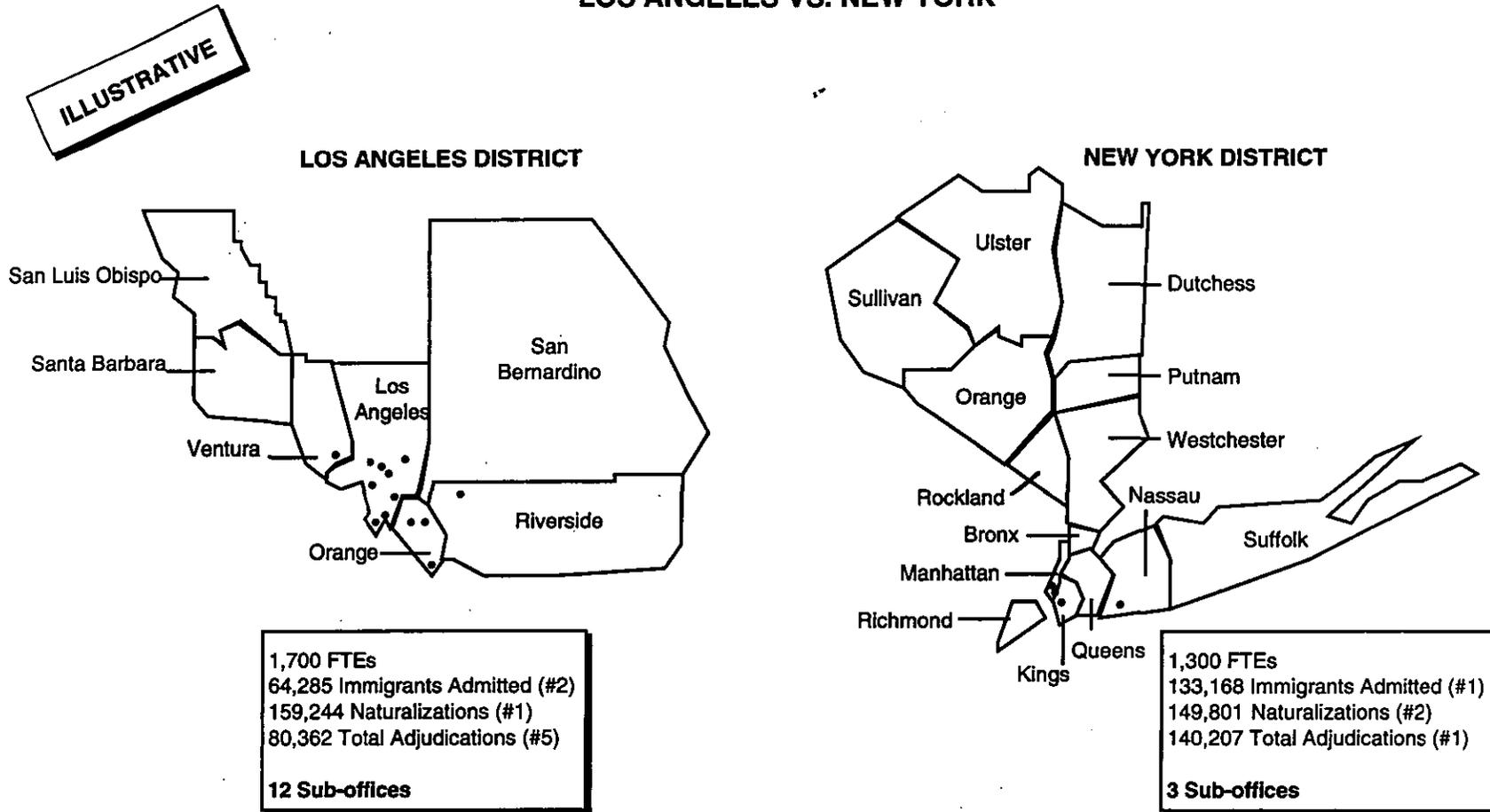
**SUMMARY: DECISION MAKING MODEL**



Current Structure...Observations...

# DISTRICTS HAVE BEEN ALLOWED TO DEVELOP THEIR OWN OPERATING MODELS, CREATING A DIFFERENT LOOK AND FEEL TO INS SERVICE OPERATIONS ACROSS GEOGRAPHIES

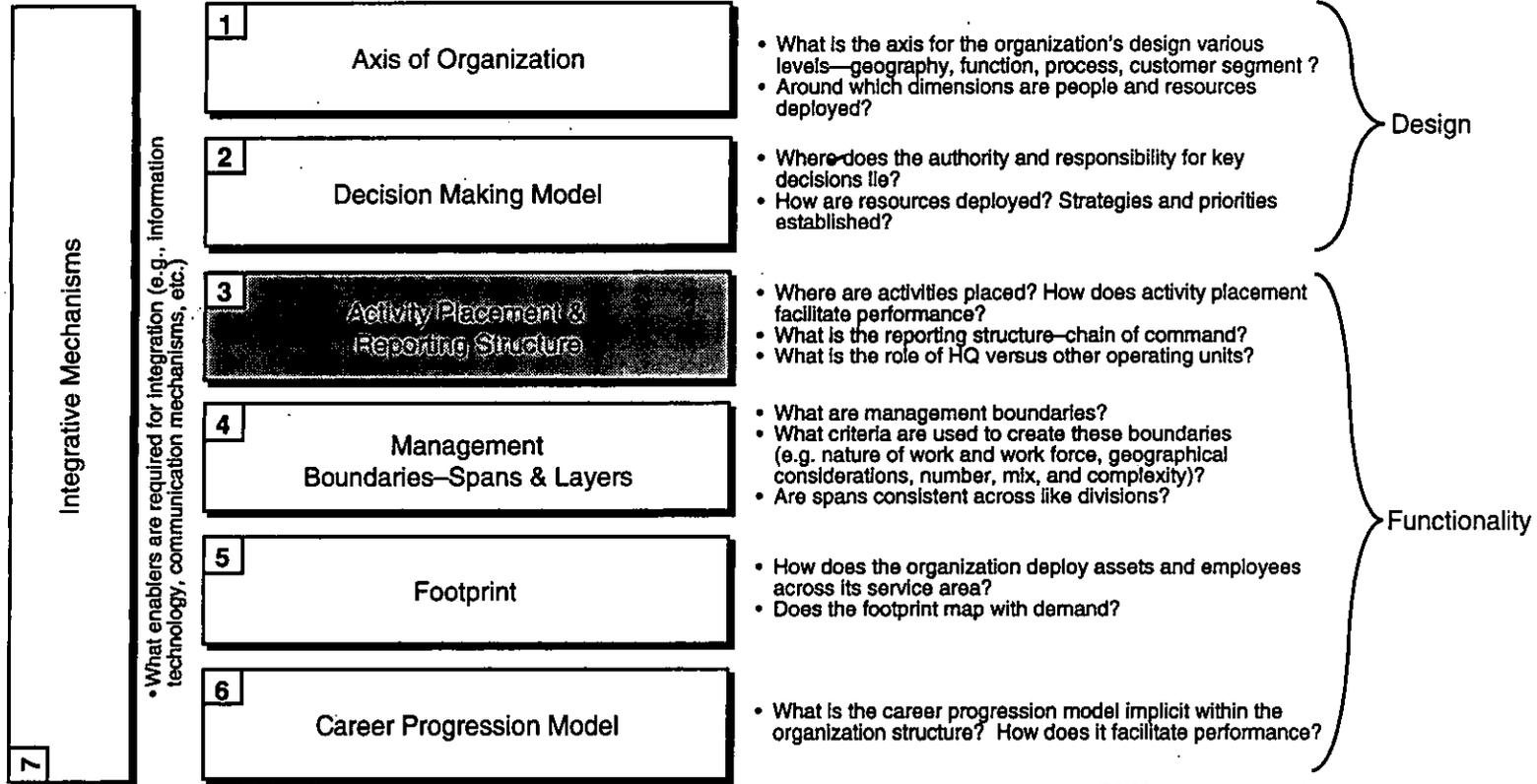
## INCONSISTENT OPERATING MODELS: LOS ANGELES VS. NEW YORK



*Note: Statistics and rankings for Immigrants Admitted and Naturalizations based on MSA; Total Adjudications based on INS Districts*  
*Source: INS statistics, 1996*

FSCH993-002-020Map

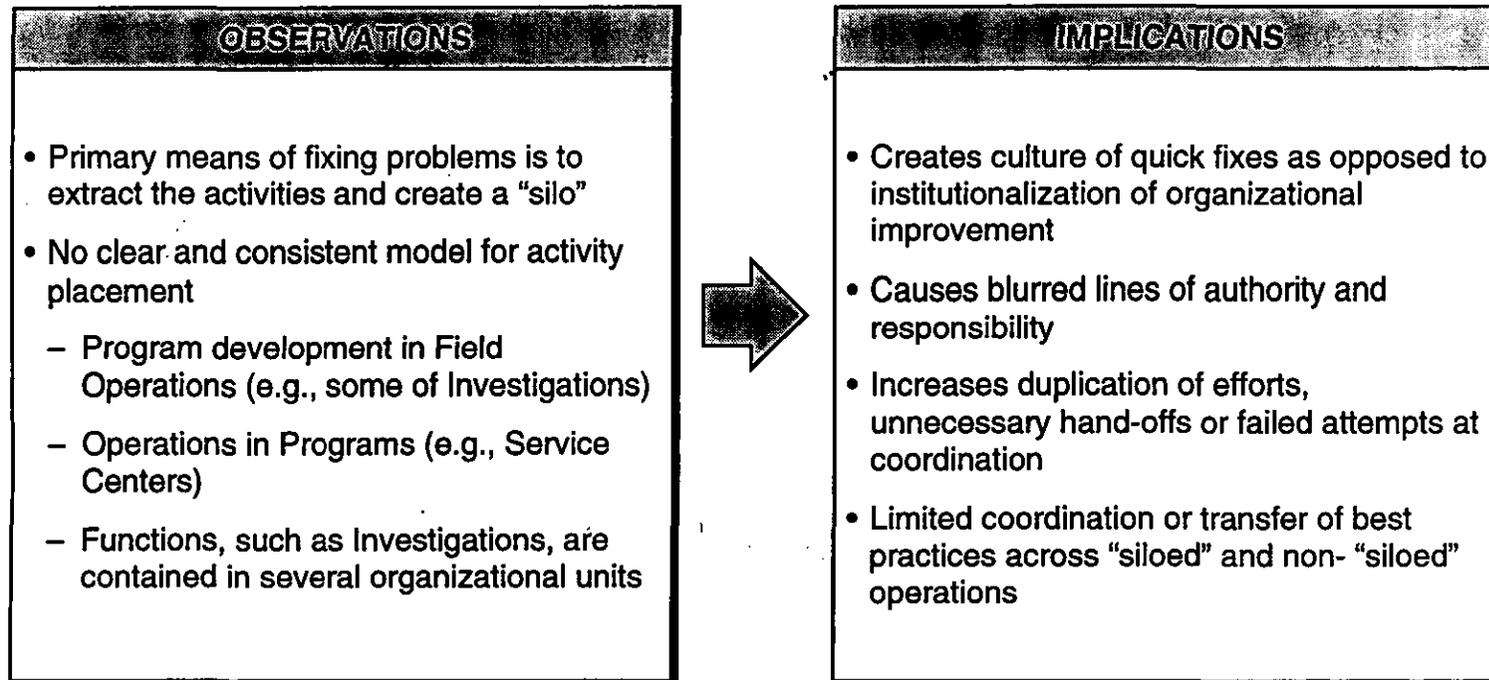
## KEY ELEMENTS OF ORGANIZATION DESIGN



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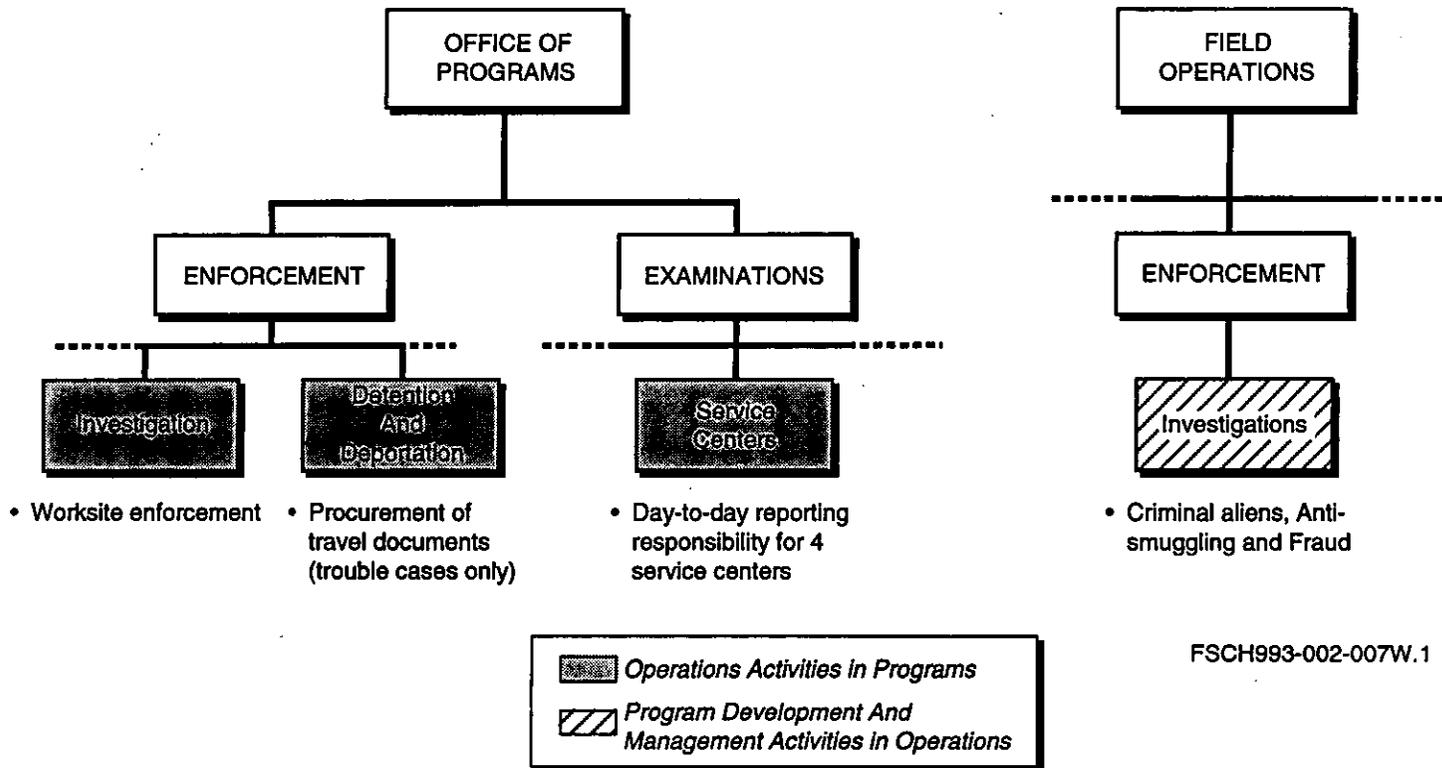
## **CURRENT ACTIVITY PLACEMENT IS NOT DRIVEN BY CLEAR, CONSISTENT LOGIC CREATING ADDITIONAL CONFUSION AND INTEGRATION REQUIREMENTS**

### **SUMMARY: ACTIVITY PLACEMENT**



# ACTIVITY PLACEMENT EXACERBATES THE ACCOUNTABILITY ISSUE WITH OPERATIONAL ACTIVITIES RESIDENT IN PROGRAM AREAS AND VICE VERSA

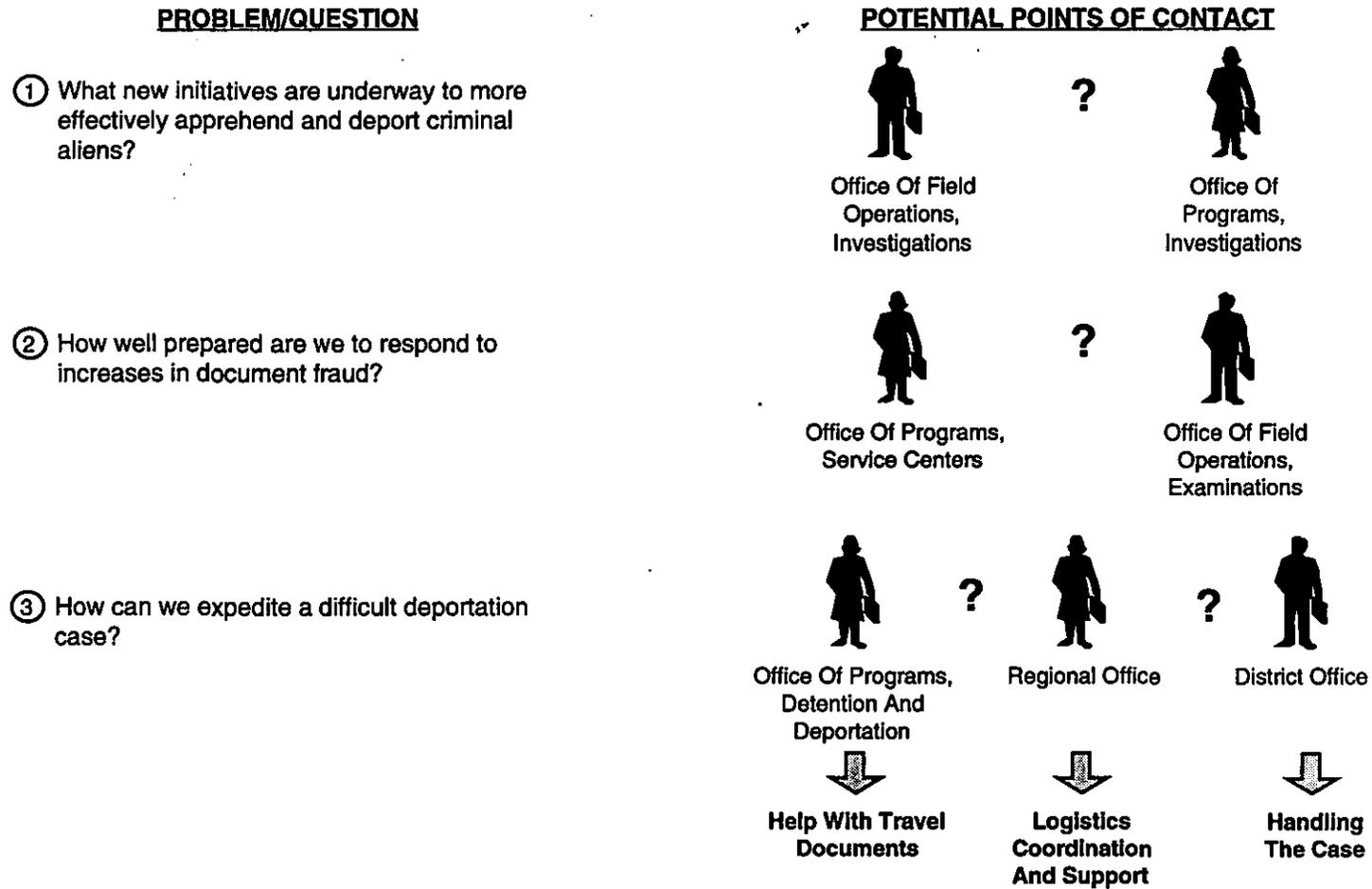
## PROBLEMS WITH ACTIVITY PLACEMENT



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# THIS PLACEMENT RESULTS IN A LACK OF CLARITY ON WHO IS RESPONSIBLE FOR ANY GIVEN ISSUE

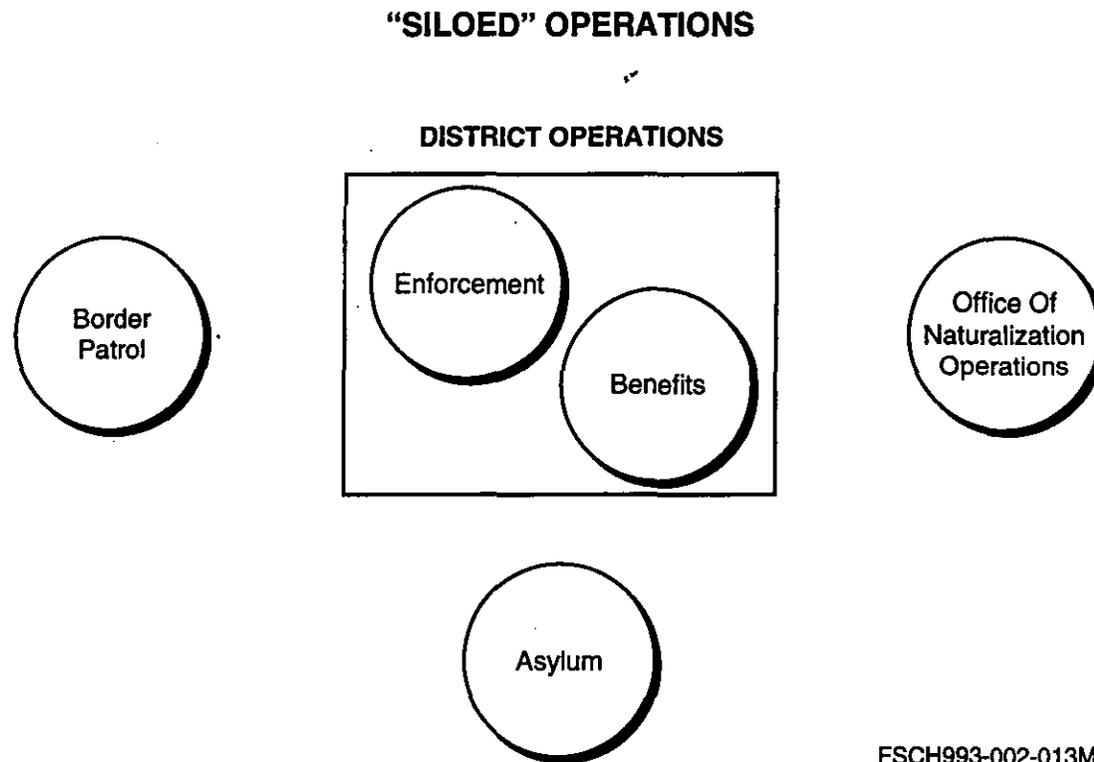
## WHO AM I GOING TO CALL?



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Current Structure...Observations...

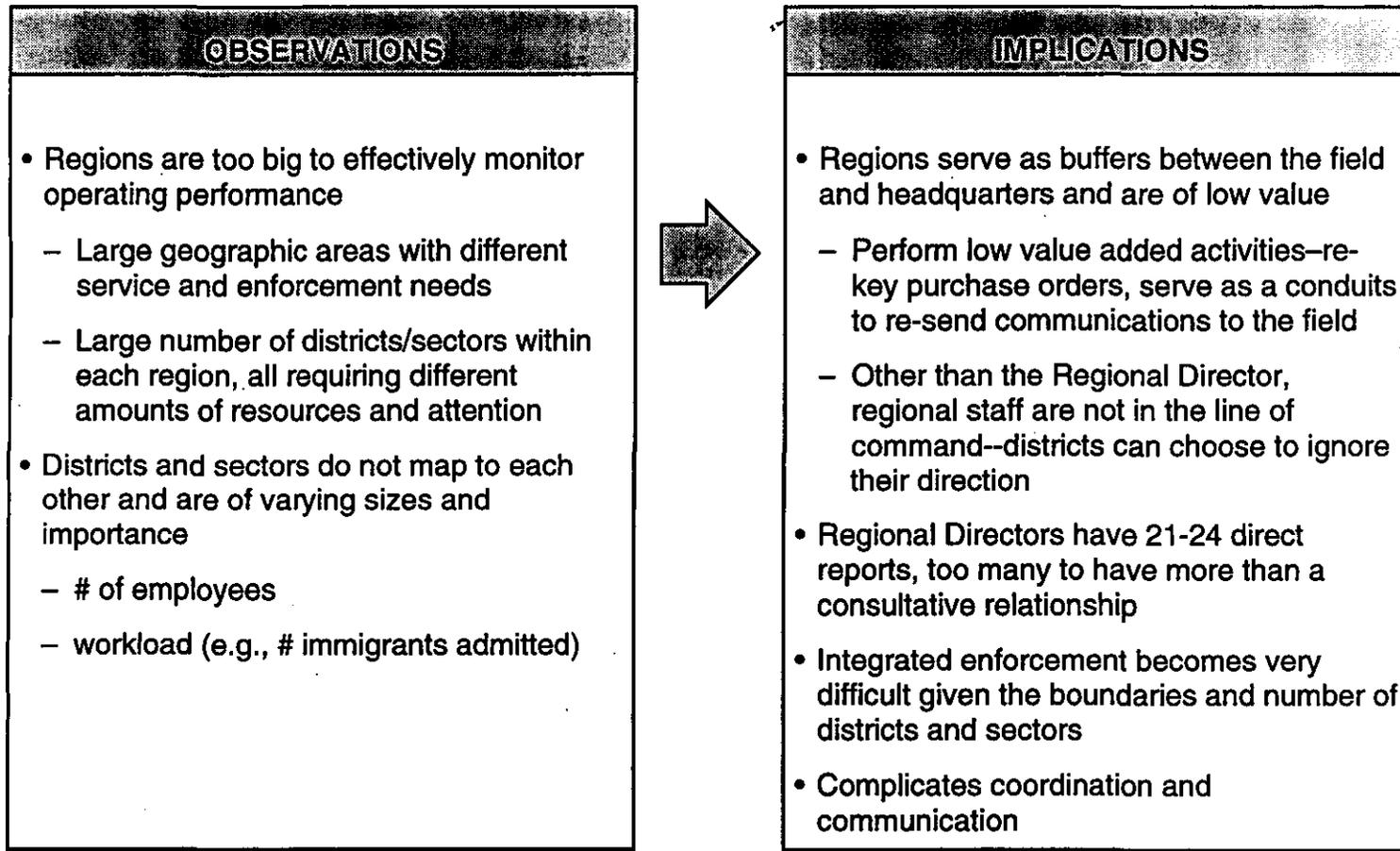
**IN ADDITION, THE CURRENT STRUCTURE HAS CREATED OPERATIONS SILOS TO EFFECTIVELY MANAGE DIFFICULT POPULATIONS OR ACTIVITIES**



**THIS APPROACH LEADS TO DUPLICATION OF EFFORTS AND PROMOTES A CULTURE THAT REWARDS "QUICK FIXES"**

**MANAGEMENT BOUNDARIES TODAY ARE SIMULTANEOUSLY TOO BIG AND TOO SMALL—  
REGIONS ARE TOO BIG TO BE EFFECTIVE, SOME DISTRICTS ARE TOO SMALL TO PERMIT  
COORDINATED EFFORTS**

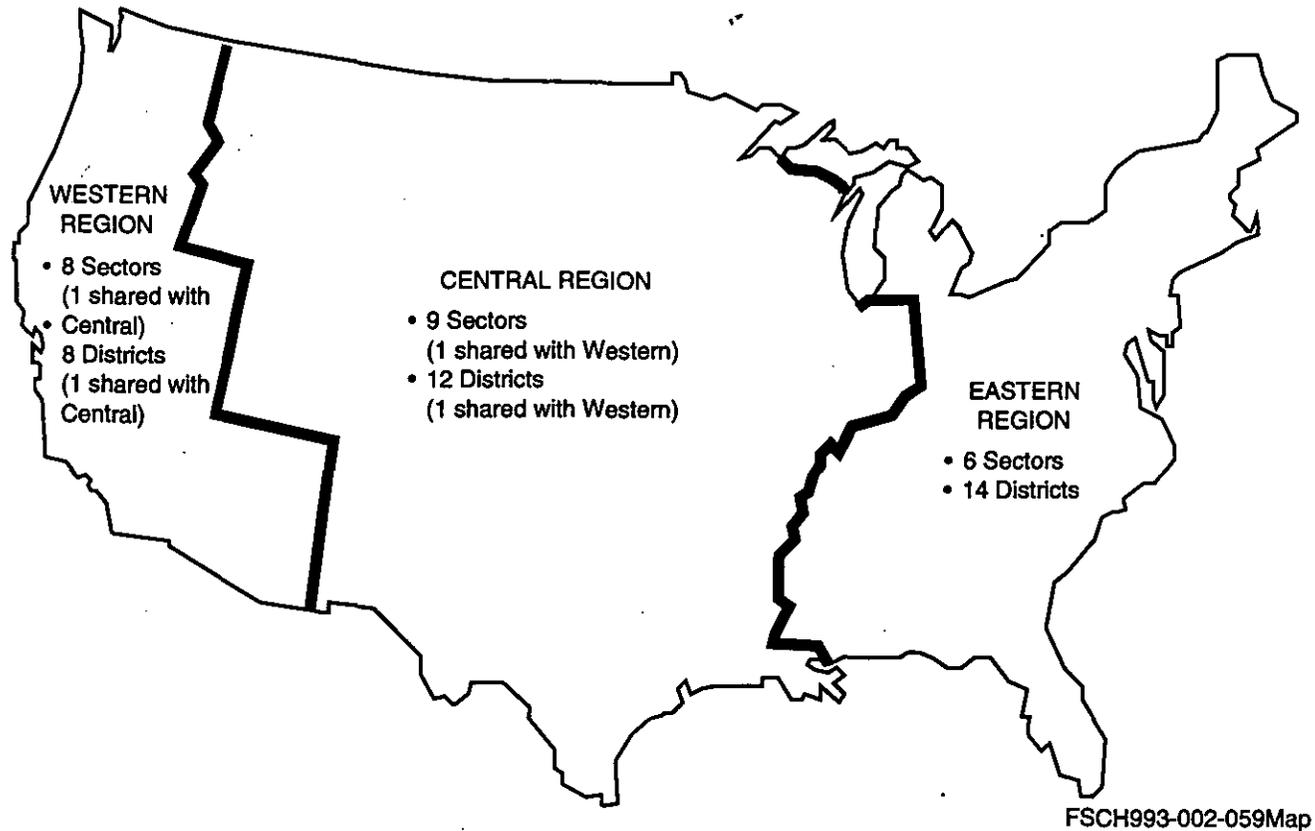
**SUMMARY: MANAGEMENT BOUNDARIES**



Current Structure...Observations...

**REGIONS ARE IMMENSE, BOTH IN TERMS OF GEOGRAPHIC AREA AND THE NUMBER OF DISTRICTS/SECTORS MANAGED**

**CURRENT INS REGIONAL STRUCTURE**



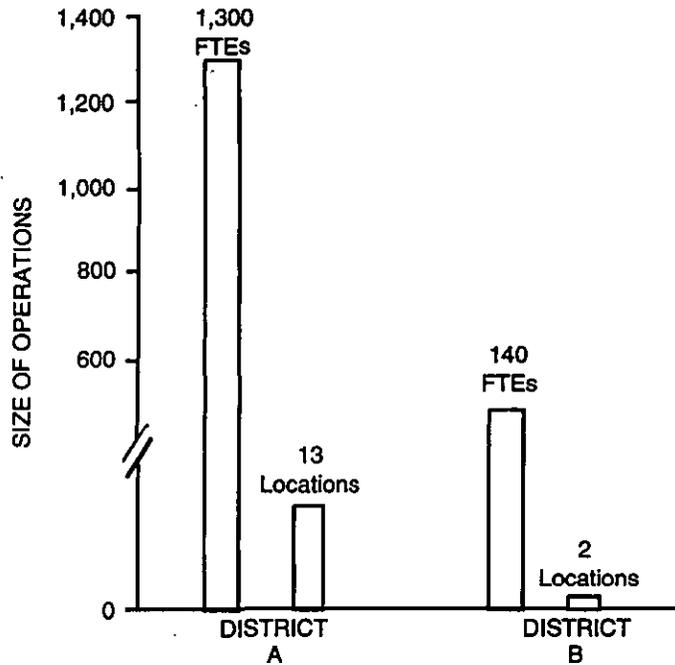
Current Structure...Observations...

**WITHIN THE REGIONS, THE DISTRICT STRUCTURE GIVES THE SAME LEVEL OF AUTHORITY TO DIRECTORS WITH VASTLY DIFFERENT AMOUNTS OF RESPONSIBILITY (E.G., WORKLOAD)**

**DISTRICT COMPARISONS**

**EXAMPLE**

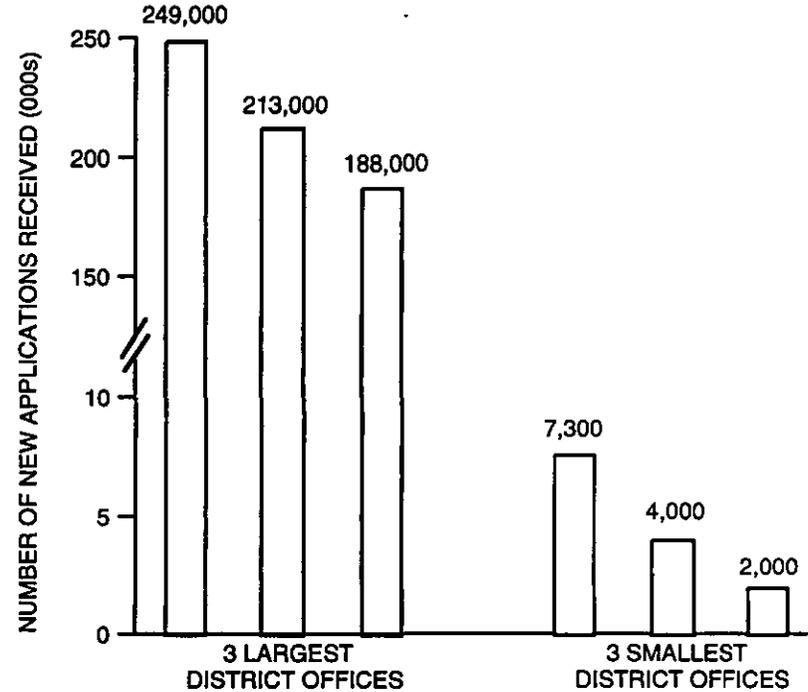
**SIZE OF DISTRICT OPERATIONS\***



\* From BA&H interviews, self-reported



**TOTAL INITIAL RECEIPTS FOR ADJUDICATION ACTIVITIES, FY 1997**



Note: Excludes International Affairs; numbers are rounded  
Source: INS Statistics Division, Operations Statistics Branch

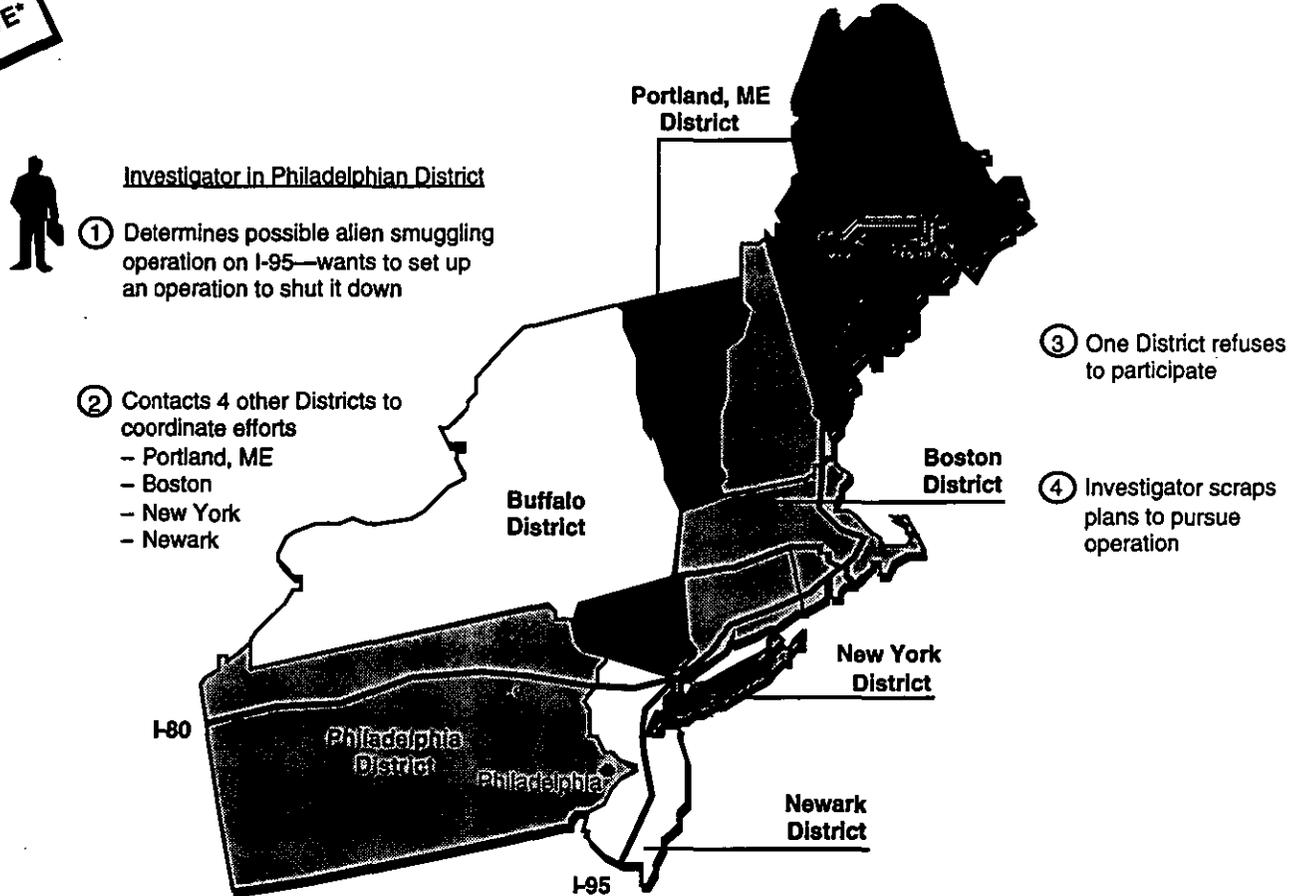
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Current Structure...Observations...

## FURTHERMORE, FRAGMENTED ENFORCEMENT BOUNDARIES MAKE AN INTEGRATED APPROACH FOR KEY INITIATIVES VERY DIFFICULT

ILLUSTRATIVE\*

### CURRENT FOOTPRINT HINDERS ANT-SMUGGLING ENFORCEMENT: EXAMPLE

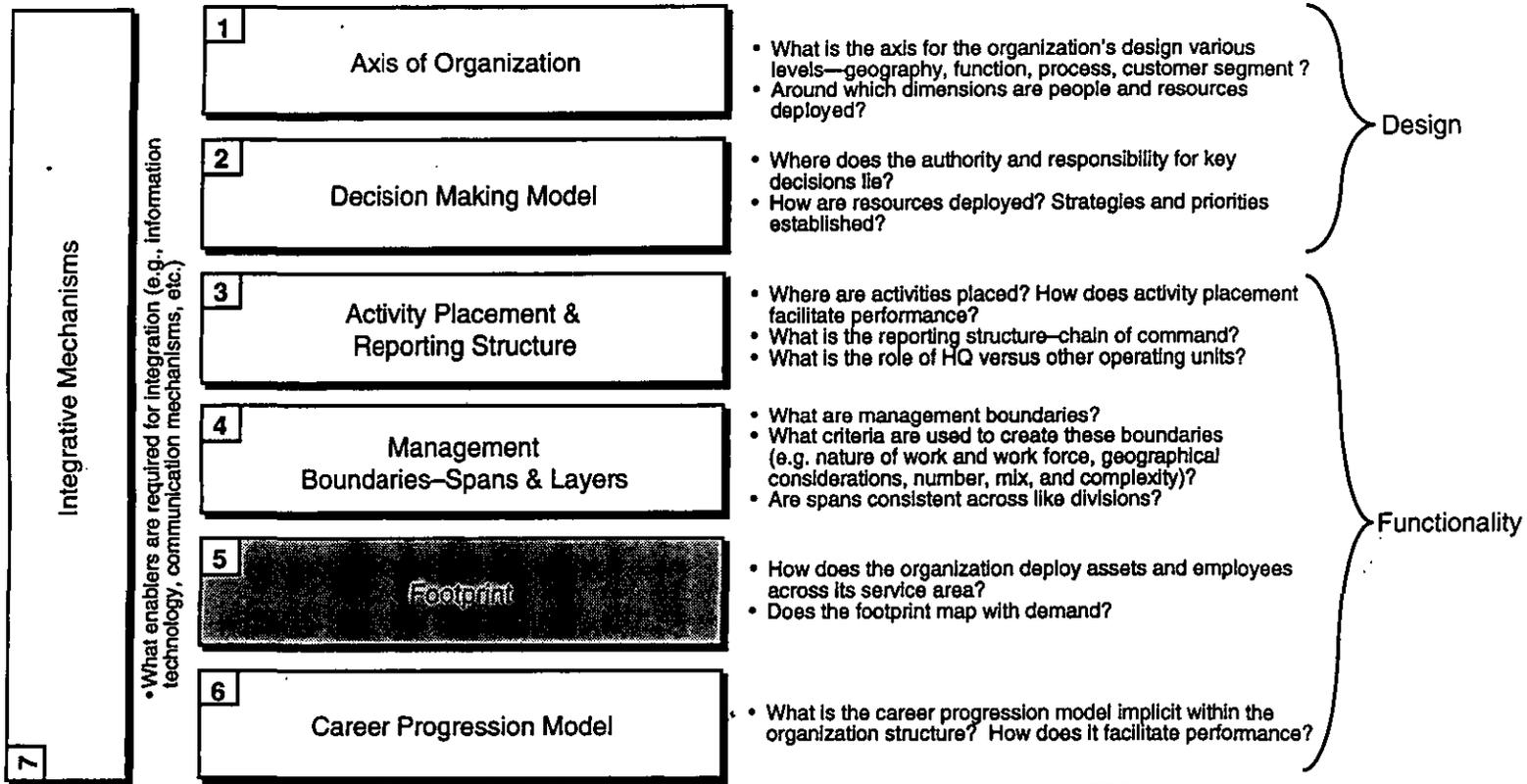


\*Based on actual events—names and details modified slightly  
Source: BA&H interviews

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## THIS ALSO EXACERBATES COORDINATION WITH EXTERNAL LAW ENFORCEMENT AGENCIES

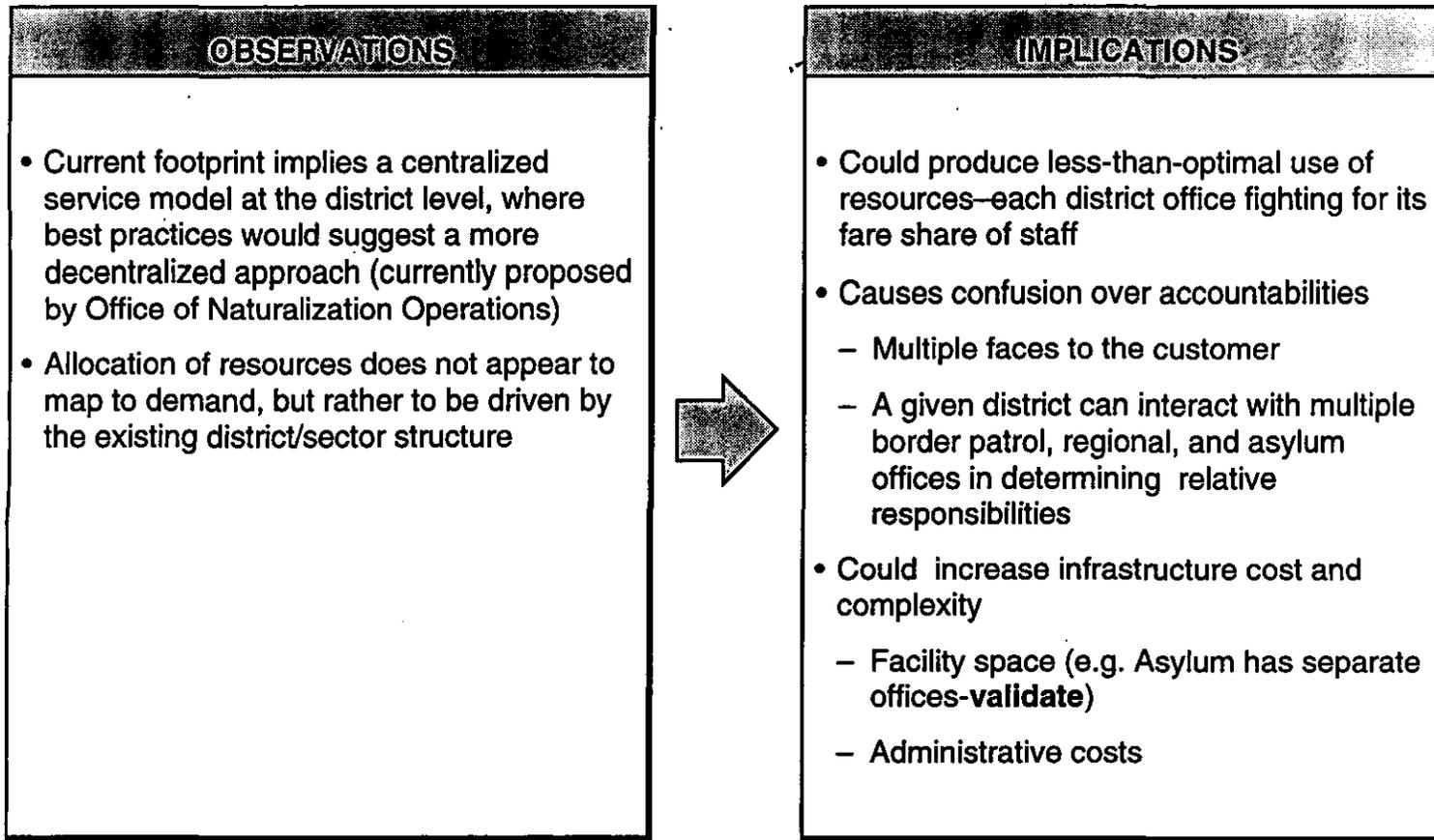
## KEY ELEMENTS OF ORGANIZATION DESIGN



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**THE CURRENT FOOTPRINT APPEARS TO BE TIED TO THE DISTRICT/SECTOR STRUCTURE, CAUSING CONFUSION AND POTENTIALLY SUB-OPTIMAL RESOURCE UTILIZATION**

**SUMMARY: FOOTPRINT**

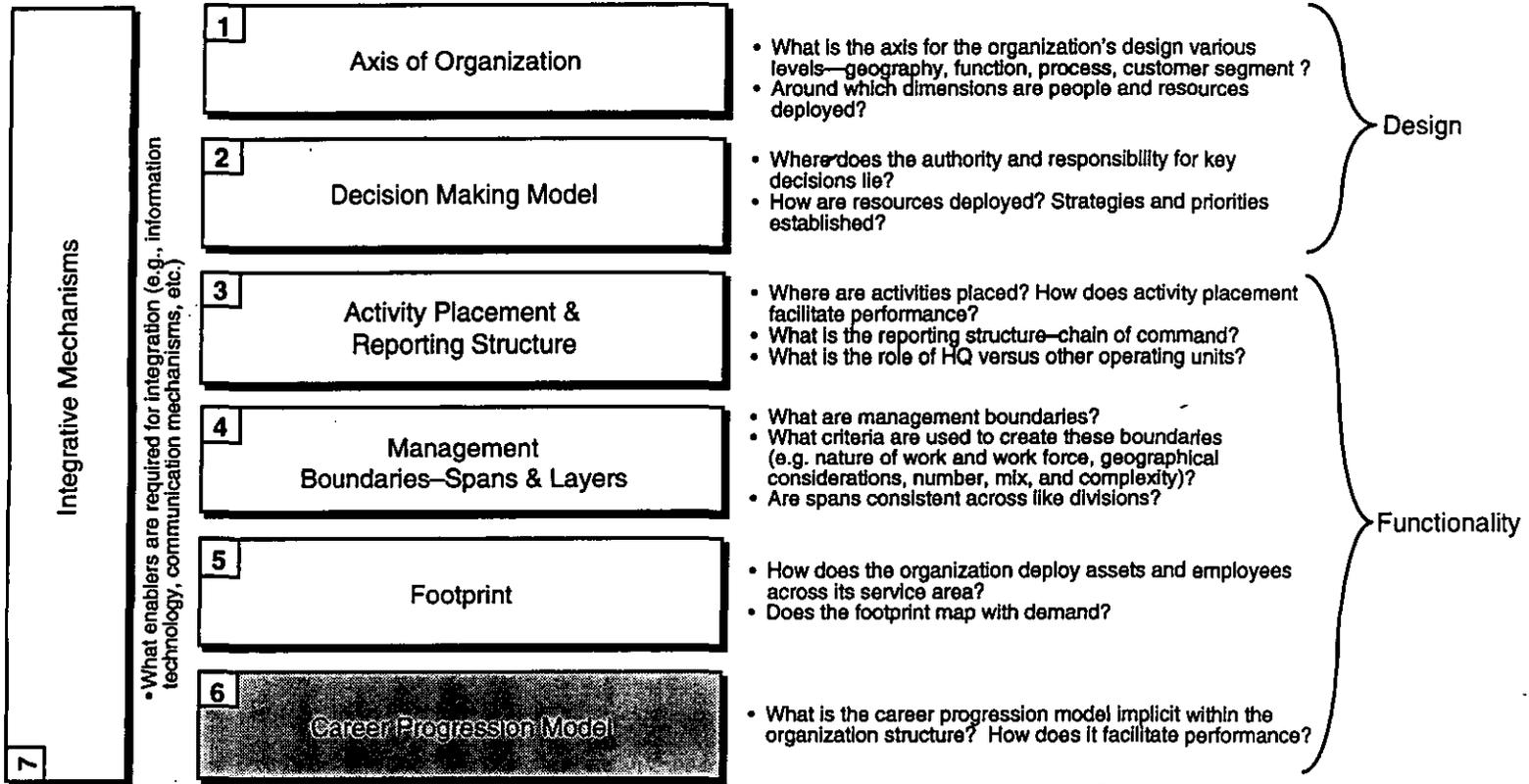


Current Structure...Observations...

**THE CURRENT STRUCTURE APPEARS TO PRODUCE LESS THAN OPTIMAL ALLOCATION OF RESOURCES—EACH DISTRICT AND REGION FIGHTING FOR ITS FAIR SHARE**

- Work in progress--explain how fragmented structure (33 districts, 21 sectors) leads to sub-optimal resource allocation

## KEY ELEMENTS OF ORGANIZATION DESIGN

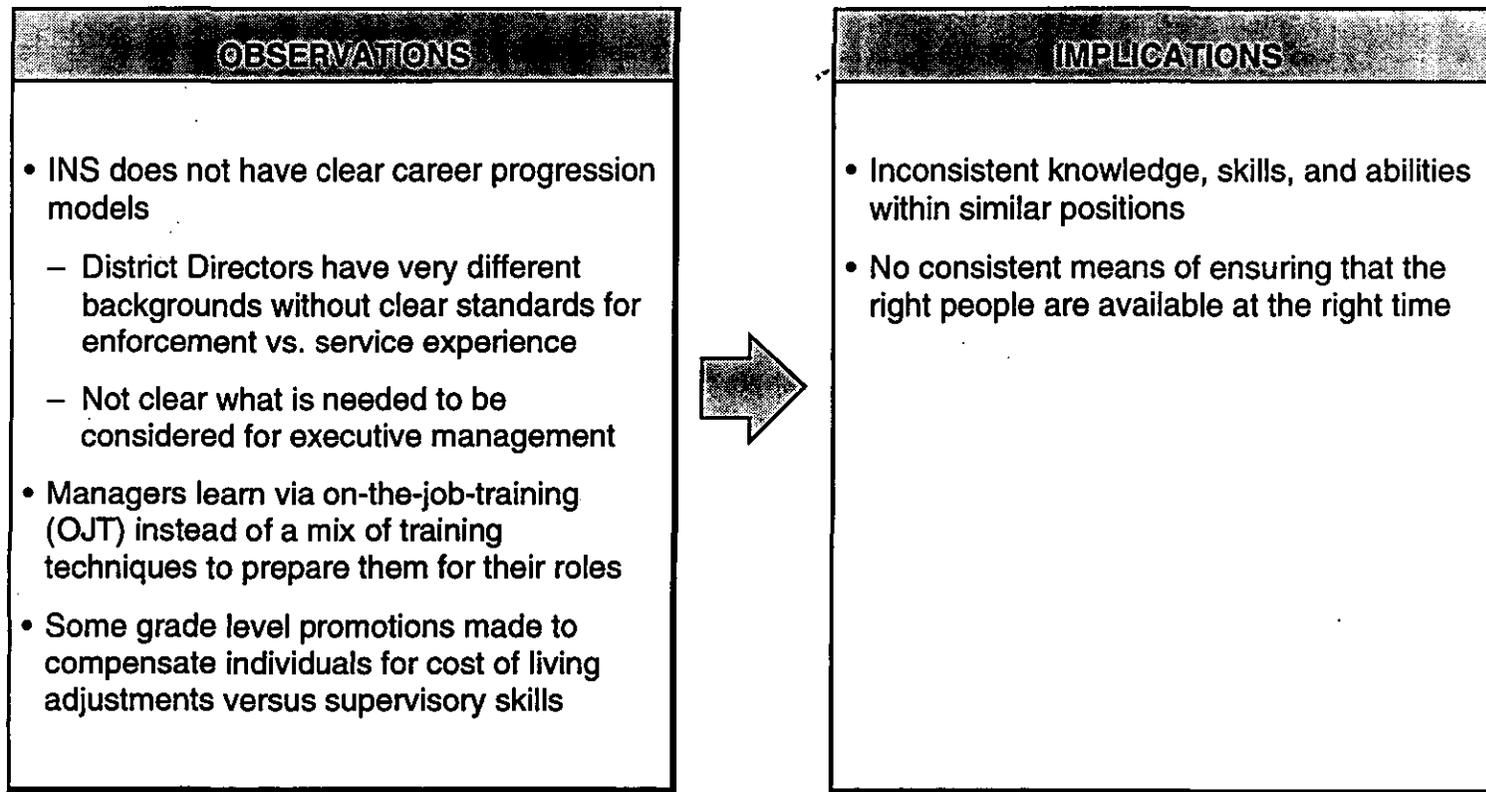


• What enablers are required for integration (e.g., information technology, communication mechanisms, etc.)

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**NO CLEAR CAREER PROGRESSION MODELS EXIST, PRODUCING INCONSISTENT KNOWLEDGE, SKILLS, AND ABILITIES THROUGHOUT THE ORGANIZATION**

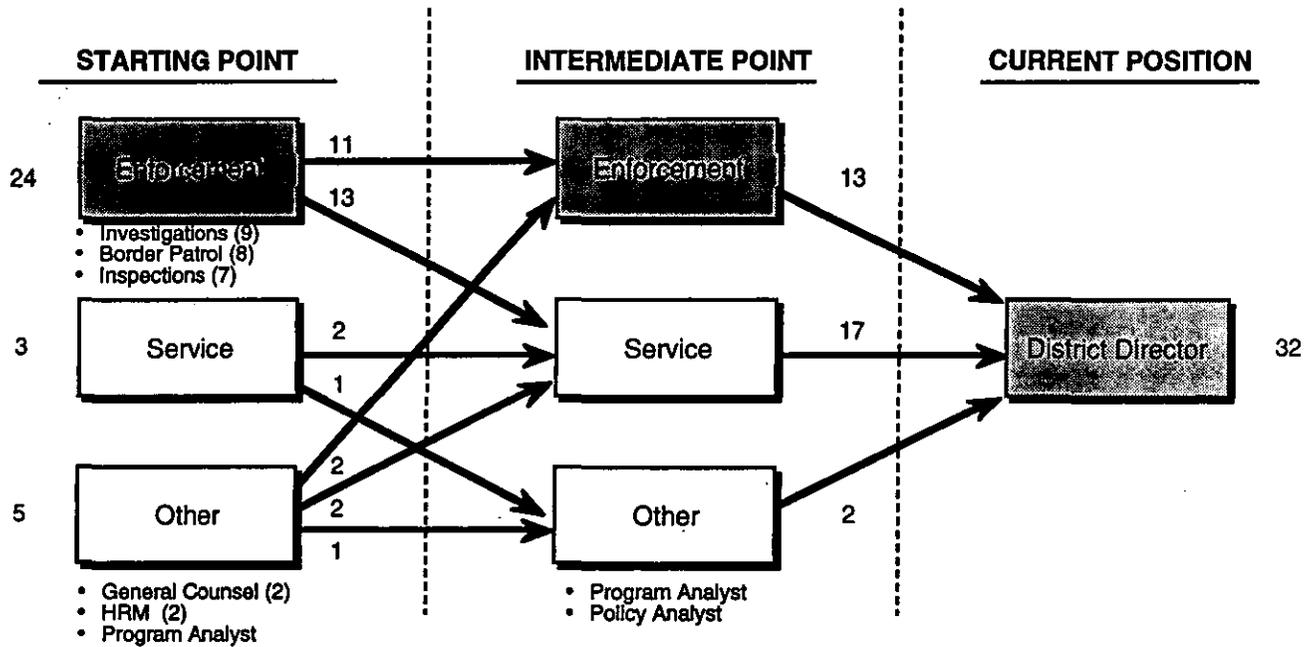
**SUMMARY: CAREER PROGRESSION MODEL**



Current Structure...Observations...

**OUT OF THE 33 INCUMBENT DISTRICT DIRECTORS, 11 HAVE NEVER HAD BENEFITS (ADJUDICATIONS) EXPERIENCE, YET THIS IS A SIGNIFICANT PART OF THEIR RESPONSIBILITIES**

**INCUMBENT DISTRICT DIRECTOR CAREER PATHS**

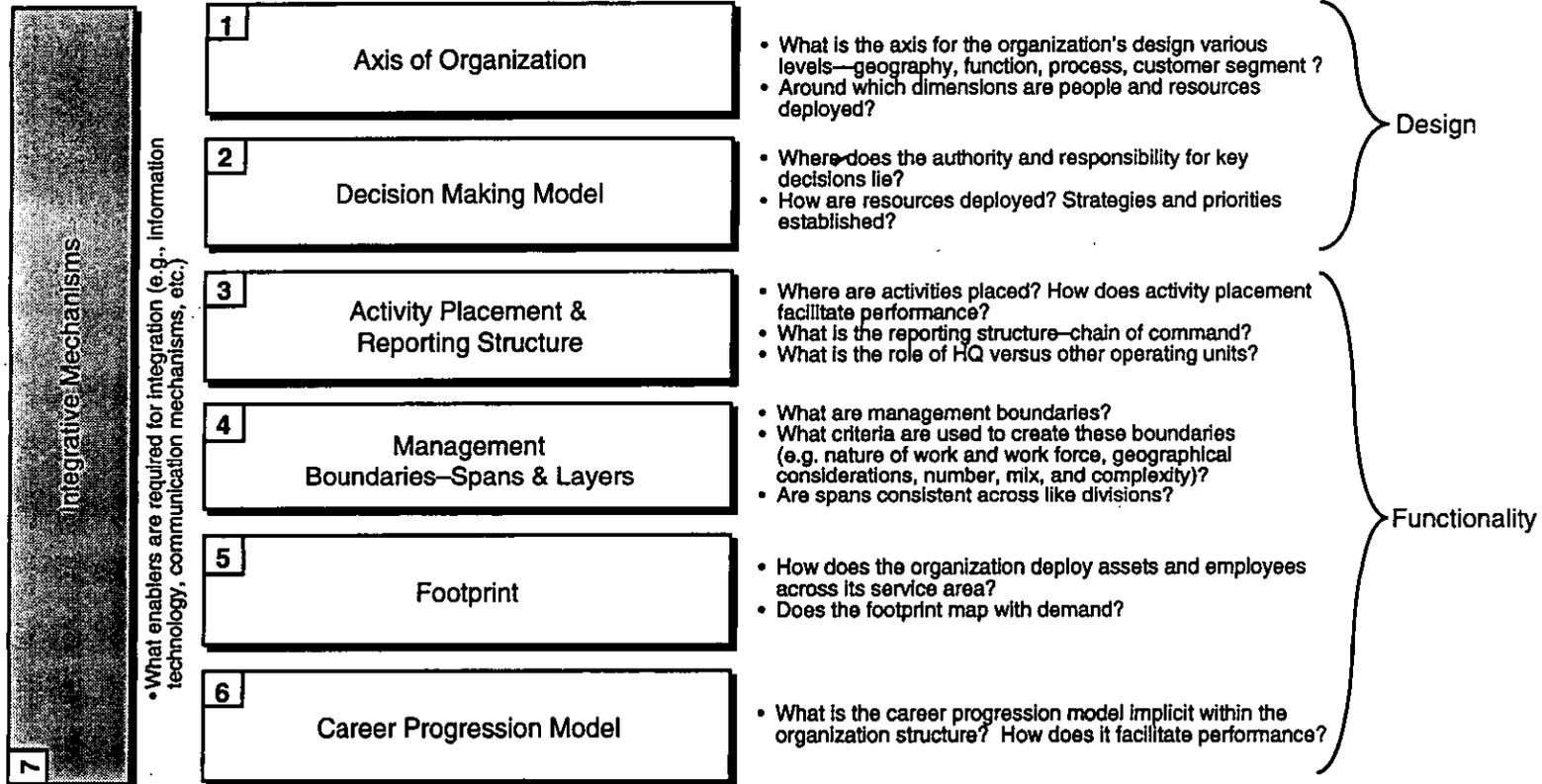


**Shading indicates District Director career path without service experience**

*Note: Data unavailable for one incumbent Inspections included in Enforcement*  
*Source: Human Resources And Development*

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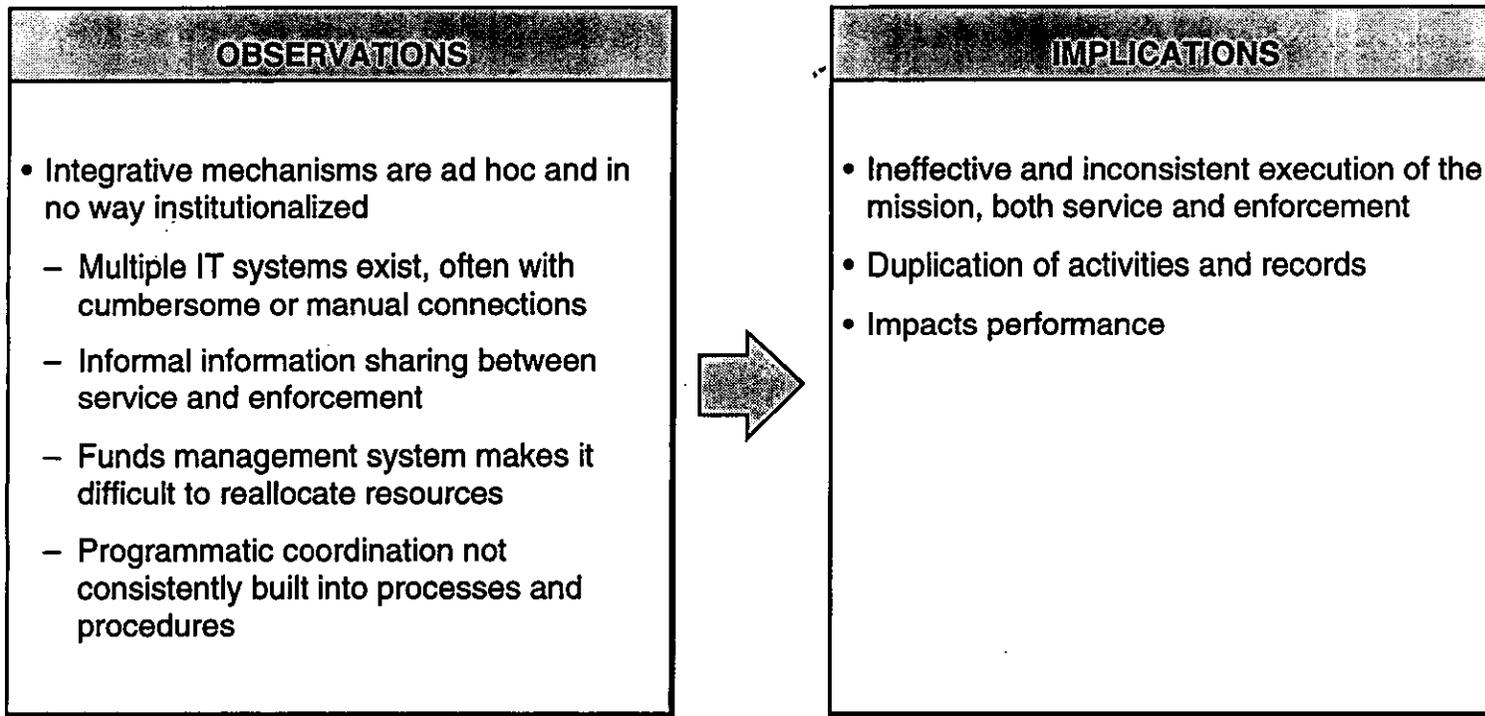
## KEY ELEMENTS OF ORGANIZATION DESIGN



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**INTEGRATIVE MECHANISMS ARE AD HOC AND IN NO WAY INSTITUTIONALIZED, PRODUCING INEFFECTIVE AND INCONSISTENT EXECUTION OF THE MISSION**

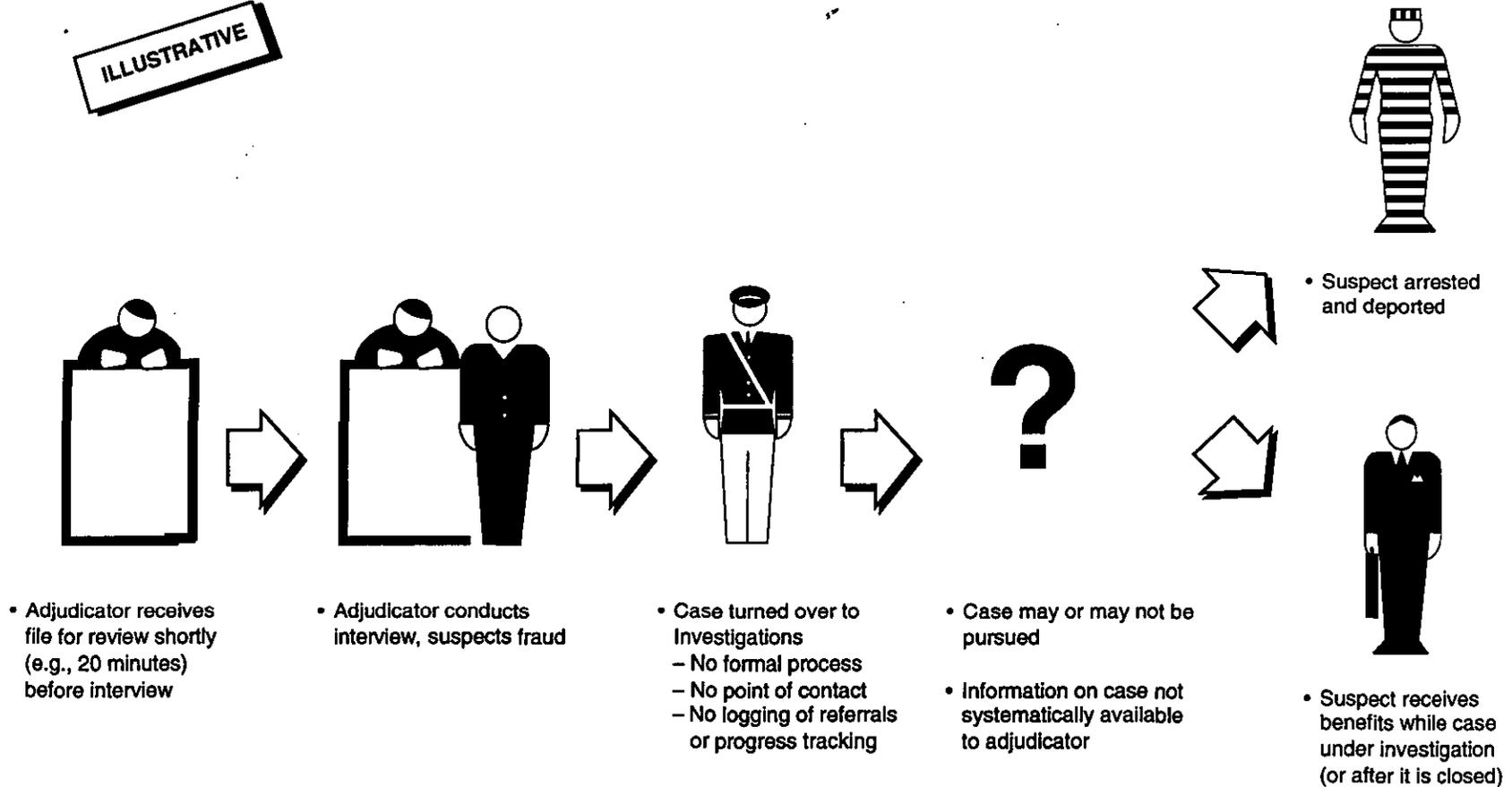
**SUMMARY: INTEGRATIVE MECHANISMS**



**WHILE STRONG LINKAGES BETWEEN SERVICE AND ENFORCEMENT SHOULD EXIST, THESE MECHANISMS ARE NOT INSTITUTIONALIZED TODAY—RESULTING IN LESS EFFECTIVE ENFORCEMENT OF IMMIGRATION LAWS**

**INFORMAL LINKAGE BETWEEN SERVICE AND ENFORCEMENT  
EXAMPLE: DISTRICT ADJUDICATION OF I-485 APPLICATION (“Green Card”)**

**ILLUSTRATIVE**



Current Structure...Observations...

**WHILE THIS SECTION HAS HIGHLIGHTED OPPORTUNITIES FOR IMPROVEMENT IN THE CURRENT ORGANIZATION, STRUCTURE IS ONLY ONE PART OF THE SOLUTION**

- **Work in progress**-- organization is only part of the answer, a complete business transformation required
- Need to reengineer key business processes ( a'la reengineering of naturalization process)
- Agency infrastructure is inadequate, in particular support systems and technology to permit the field to operate effectively
- Additional thoughts here...

**III. DESIGN OF HIGH LEVEL ORGANIZATION  
STRUCTURE**

Design...

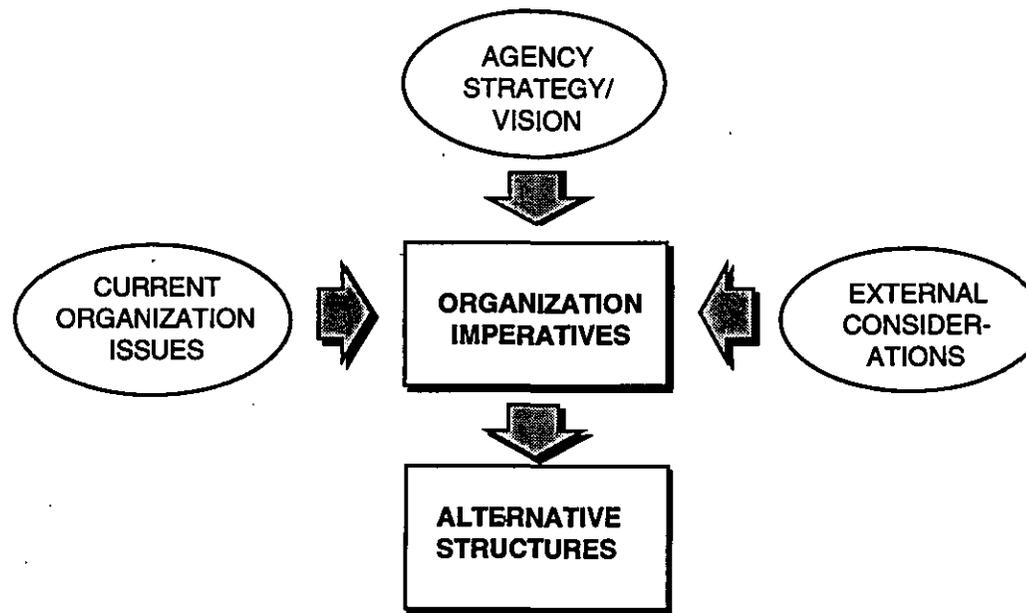
## **THIS SECTION FOCUSES ON DESIGN OF THE HIGH LEVEL ORGANIZATION STRUCTURE**

- Articulates organization imperatives—what objectives must any restructuring achieve?
- Outlines the decision process used and alternatives considered in coming up with a recommended high level structure (primary axis and decision making model)
- Please note: Section IV describes the primary operational units in greater detail using the remaining design elements:
  - Activity Placement
  - Management Boundaries—Spans & Layers
  - Footprint
  - Career Progression Model

Design...

**PRIOR TO BEGINNING DESIGN OF ALTERNATIVE STRUCTURES, ONE MUST ARTICULATE THE OBJECTIVES OR ORGANIZATION IMPERATIVES TO BE ACHIEVED WITH RESTRUCTURING**

**DESIGN OF ALTERNATIVE STRUCTURES:  
ARTICULATION OF ORGANIZATION IMPERATIVES**

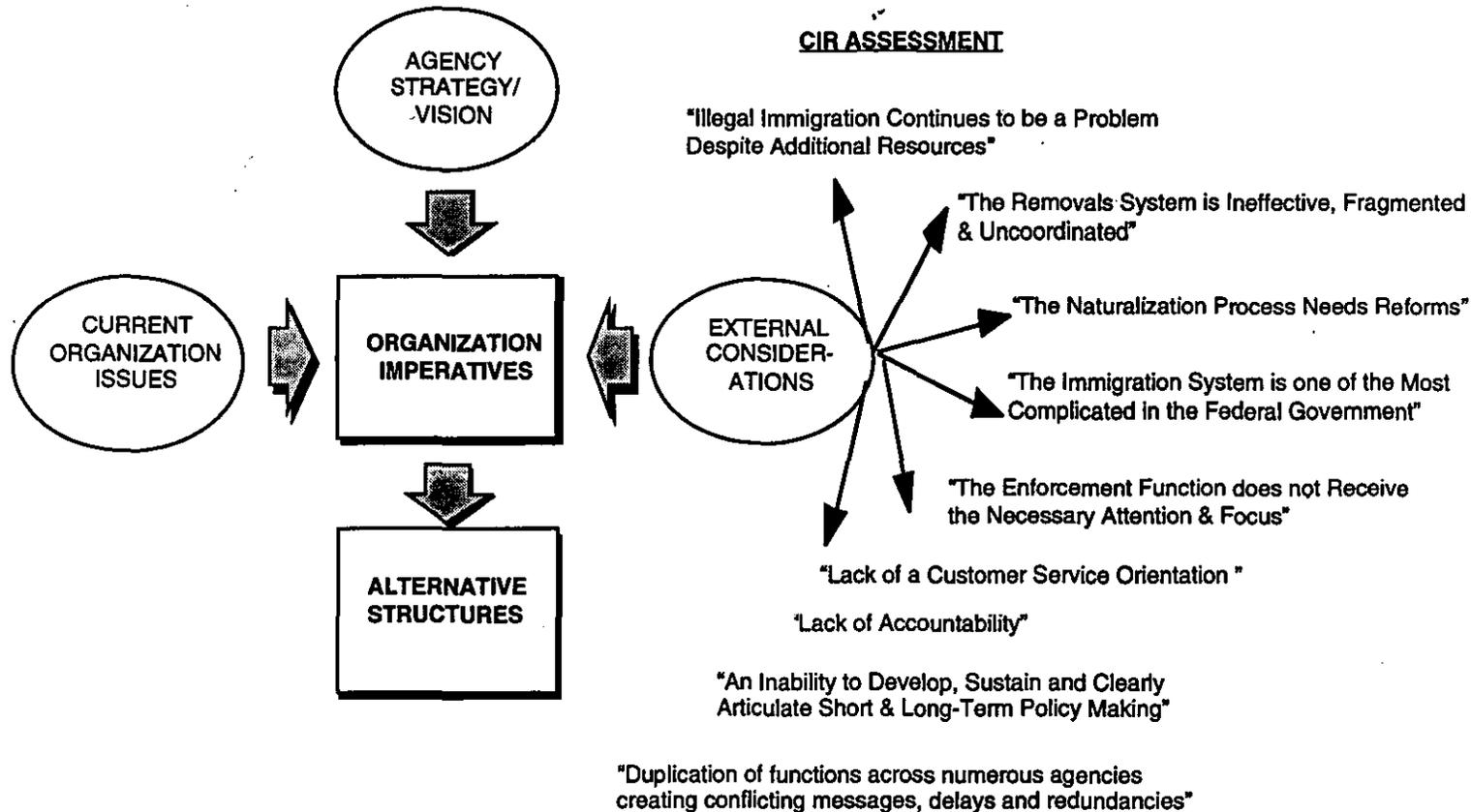


**THE PREVIOUS SECTION OUTLINED OPPORTUNITIES FOR IMPROVEMENT IN THE CURRENT ORGANIZATION STRUCTURE**

Design...

## EXTERNAL CRITICISMS OF INS PERFORMANCE CAN BE SUMMARIZED IN THE ASSESSMENT OF THE AGENCY PERFORMED BY THE COMMITTEE ON IMMIGRATION REFORM (CIR)

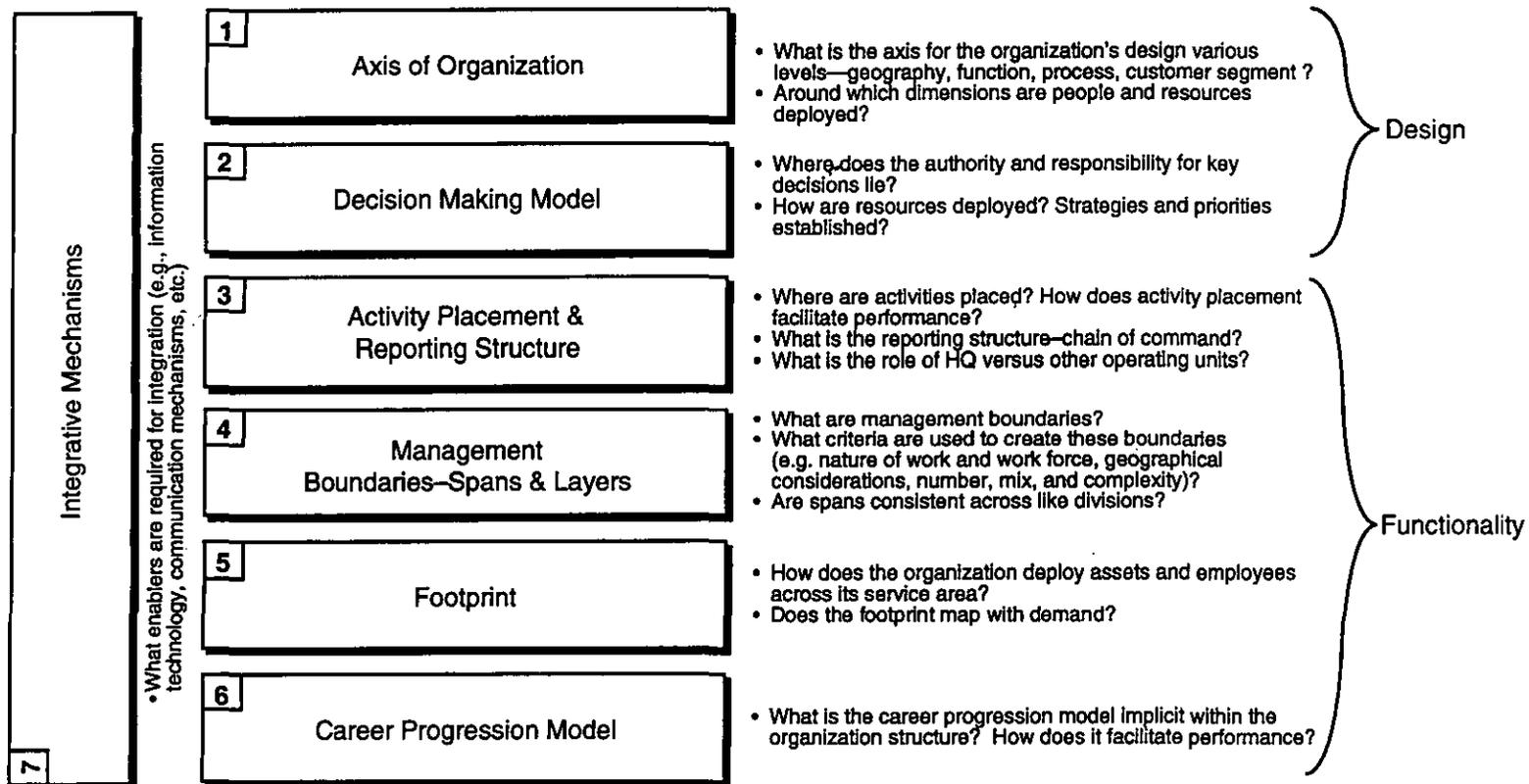
### ORGANIZATION IMPERATIVES: EXTERNAL ASSESSMENT OF PERFORMANCE (CIR)



Note: CIR comments paraphrased for brevity  
Source: Commission on Immigration Reform, Final Report

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## KEY ELEMENTS OF ORGANIZATION DESIGN



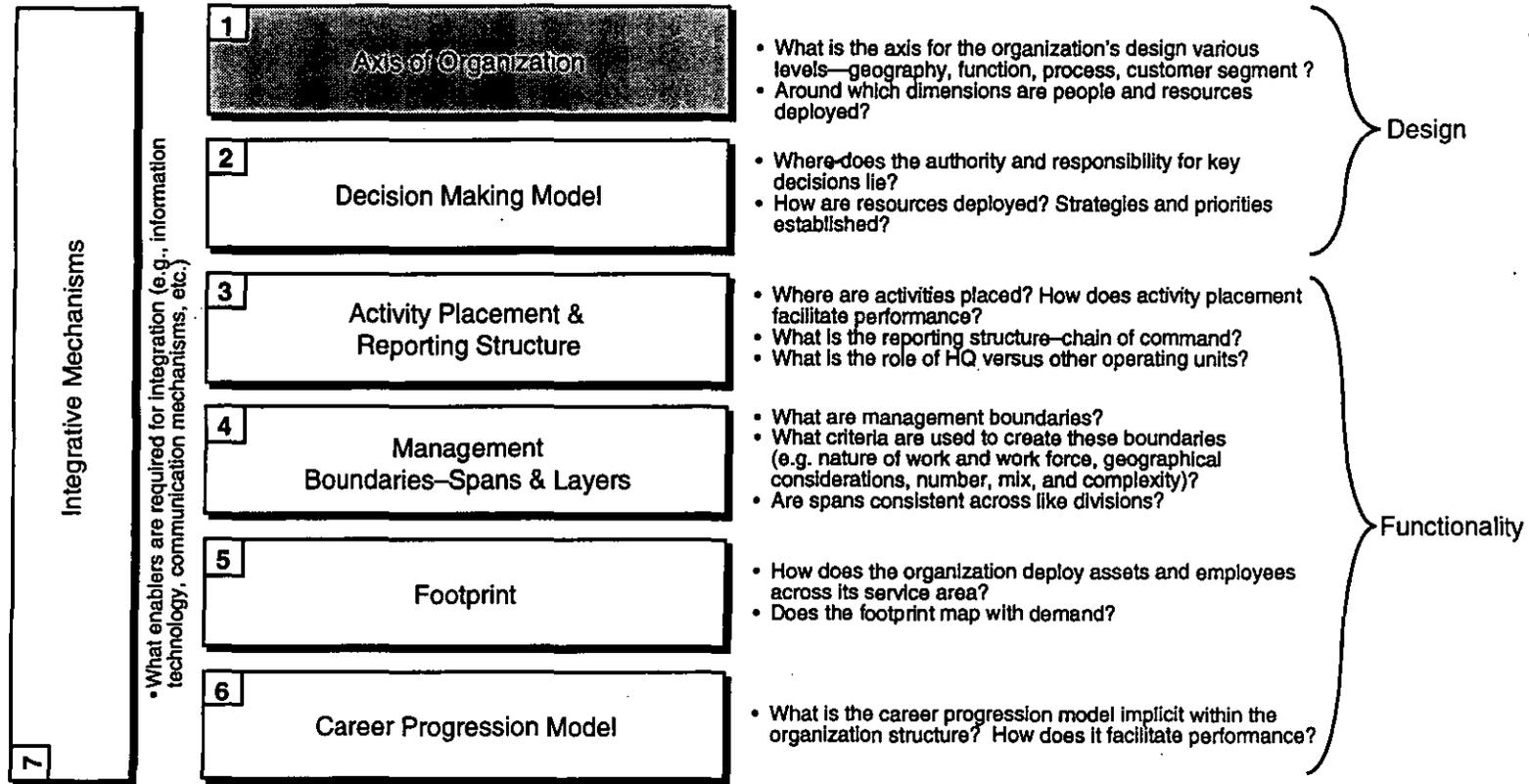
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Design...

**INSIGHT INTO THE AGENCY'S VISION AND STRATEGY MUST ALSO GUIDE ORGANIZATION REDESIGN**

- Work in progress--talk about INS vision/strategy and what reorganization needs to accomplish

## KEY ELEMENTS OF ORGANIZATION DESIGN



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Design...

**BASED UPON AN UNDERSTANDING OF INS STRATEGY, CURRENT INTERNAL AND EXTERNAL SITUATIONS, WE CAN ARTICULATE FOUR IMPERATIVES THAT MUST BE ACHIEVED BY ANY SUCCESSFUL REORGANIZATION EFFORT**

<b>ORGANIZATIONAL IMPERATIVES</b>
1. Develop clear lines of accountability
2. Create customer-oriented service capabilities
3. Build professional capabilities in law enforcement and services
4. Fulfill singular INS mission: to uphold the immigration laws of United States as intended by Congress

Design...Primary Axis...

**SEVERAL PRIMARY AXIS ORGANIZATION ALTERNATIVES CAN BE CONSIDERED FOR THE INS**

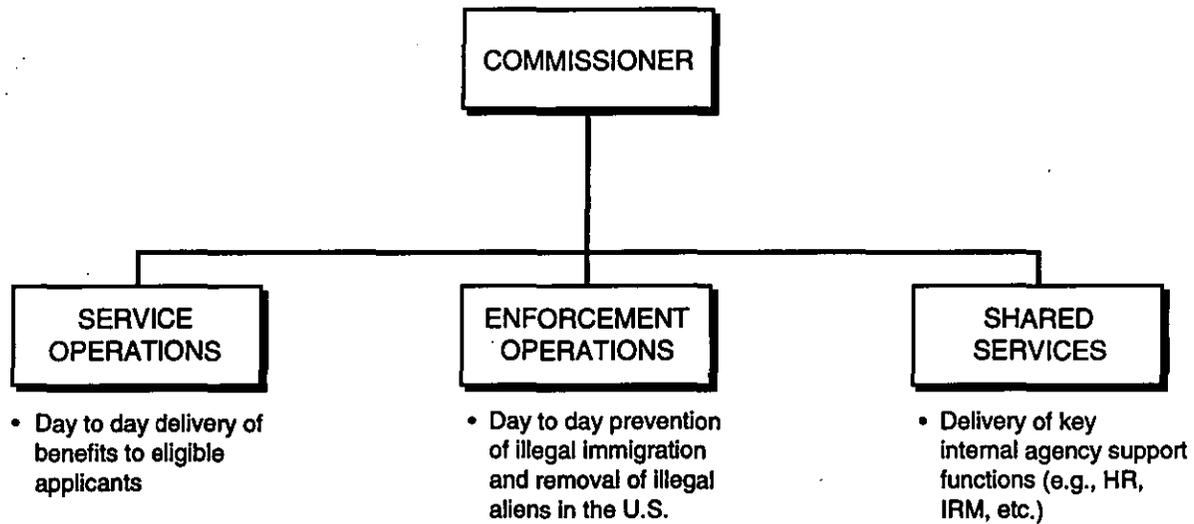
**PRIMARY AXIS ORGANIZATION ALTERNATIVES**

PRIMARY AXIS ALTERNATIVE	CONCEPT DESCRIPTION	HOW CONCEPT COULD BE APPLIED AT INS
CUSTOMER SEGMENT	Organization aligns key functions/ accountability against discrete customer segment business units	<ul style="list-style-type: none"> <li>• INS organized along distinct customer group lines. For example:               <ul style="list-style-type: none"> <li>- Employers</li> <li>- US Citizens (families)</li> </ul> </li> </ul>
FUNCTION	Accountability divided along traditional functional lines—e.g. sales and marketing, finance	<ul style="list-style-type: none"> <li>• Agency accountabilities and functions aligned around three high level activity groupings:               <ul style="list-style-type: none"> <li>- Operations</li> <li>- Support</li> <li>- Strategy</li> </ul> </li> </ul>
GEOGRAPHIC	Organization aligns key functions/ accountability against geographic business units	<ul style="list-style-type: none"> <li>• Agency divided into discrete geographic operating units--a number of options:               <ul style="list-style-type: none"> <li>- Regional structure with local operating units or ...</li> <li>- Local operating units reporting directly to HQ</li> <li>- Service and enforcement activities would come under the same management structure</li> </ul> </li> </ul>
PROCESS	Accountability structured around major processes, e.g. customer satisfaction	<ul style="list-style-type: none"> <li>• Agency aligned along key processes, e.g.:               <ul style="list-style-type: none"> <li>- Naturalization process</li> <li>- Other adjudication processes</li> <li>- Border management process</li> </ul> </li> </ul>

Design...Primary Axis...

**WE RECOMMEND A FUNCTIONAL PRIMARY AXIS WITH A SPLIT BETWEEN SERVICE AND ENFORCEMENT OPERATIONS**

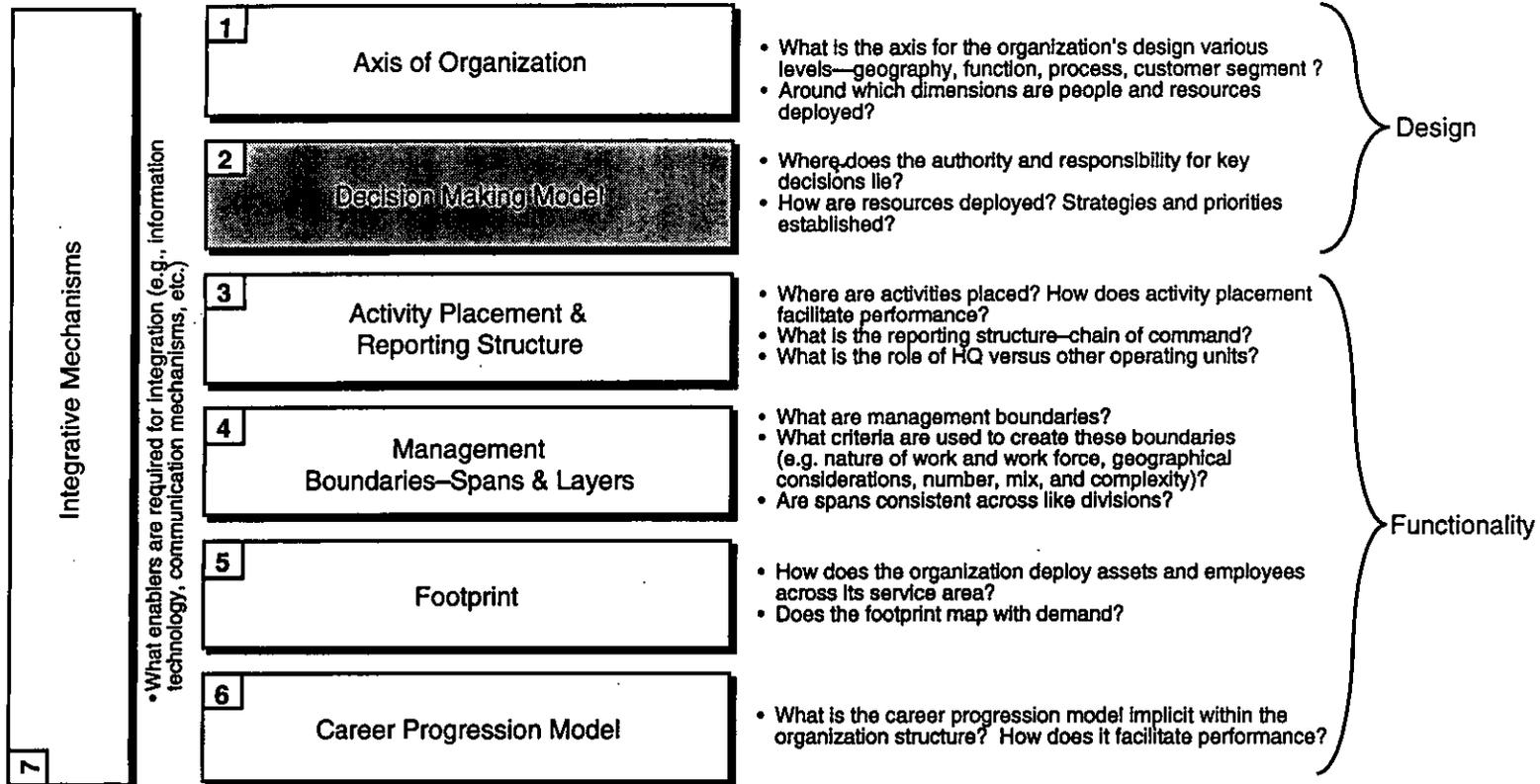
**HIGH-LEVEL ORGANIZATION DESIGN**



*Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations*

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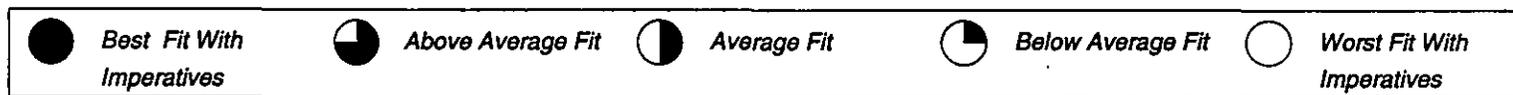
## KEY ELEMENTS OF ORGANIZATION DESIGN



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## A FUNCTIONAL PRIMARY AXIS BEST SATISFIES THE FOUR ORGANIZATION IMPERATIVES

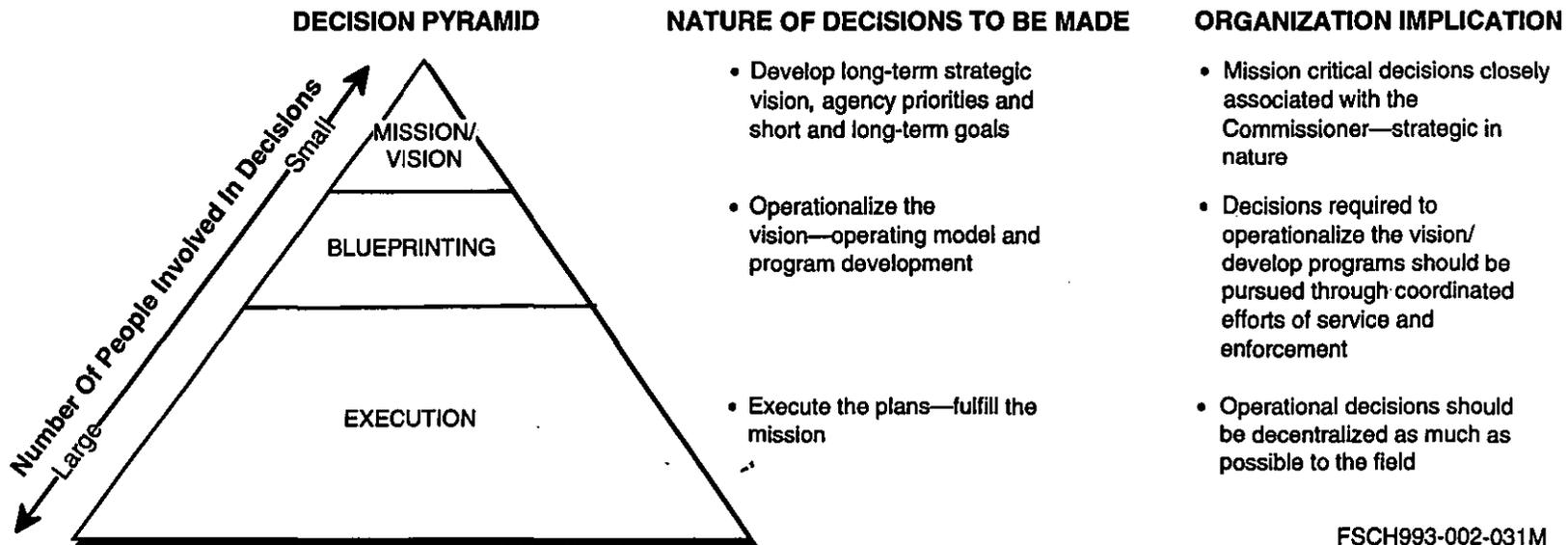
IMPERATIVE	SCORING				RATIONALE
	SEGMENT	FUNCTION	GEOGRAPHY	PROCESS	
1. Develop clear lines of accountability					<ul style="list-style-type: none"> <li>While most options could be structured with clear accountabilities, the functional option creates clear lines according to the service/enforcement split embedded in the INS mission</li> </ul>
2. Create customer-oriented service capabilities					<ul style="list-style-type: none"> <li>Organizing specifically by function creates one unit responsible for all aspects of service operations</li> </ul>
3. Build professional capabilities in enforcement and service					<ul style="list-style-type: none"> <li>A functional axis directly aligns the organization structure with these professional communities</li> </ul>
4. Fulfill the INS mission: to uphold the immigration laws					<ul style="list-style-type: none"> <li>The functional organization is directly tied to the two aspects of the mission, yet provides consistent interpretation of law and strategy development at headquarters to integrate the two</li> </ul>



Design...Decision Making Model...

## DESIGNING THE HIGH LEVEL DECISION MAKING MODEL CAN BE GUIDED BY A SIMPLE DECISION PYRAMID

### DECISION MAKING HIERARCHY – ORGANIZATION IMPLICATIONS



FSCH993-002-031M

Design...Decision Making Model...

**THIS MODEL WOULD IMPLY THAT STRATEGY FORMULATION IS A COMMISSIONER-LED ACTIVITY, BUT HOW OTHER DECISIONS ARE MADE REQUIRES SOME DISCUSSION**

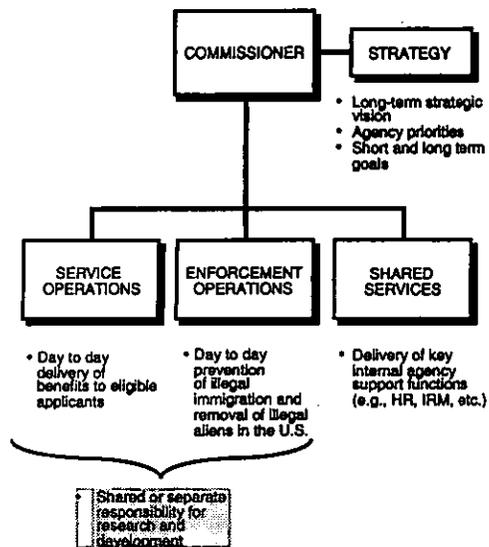
- **Work in process**—page that explains what blueprinting is and where it could be done--this work is currently performed by the Office of Programs in conjunction with Office of Policy and Planning (current placement is problematic)
- Discussion of resource allocation decisions would be made at the highest level

Design...Decision Making Model...

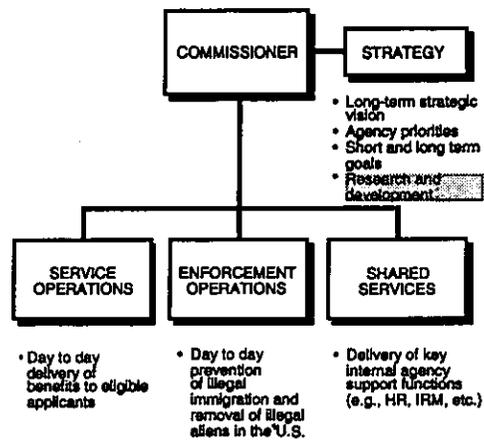
## THERE ARE THREE PRIMARY OPTIONS FOR THE PLACEMENT OF RESEARCH AND DEVELOPMENT (PROGRAM BLUEPRINTING) FUNCTIONS

### DECISION-MAKING MODEL—OPTIONS

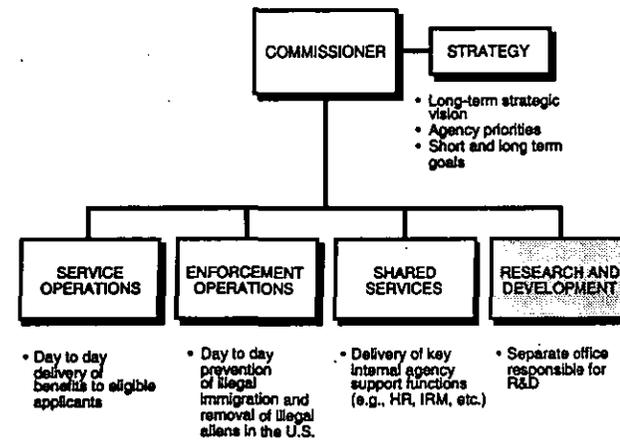
Option 1: Operations Units Responsible



Option 2: R&D Tied To Strategy



Option 3: Separate R&D Office At HQ

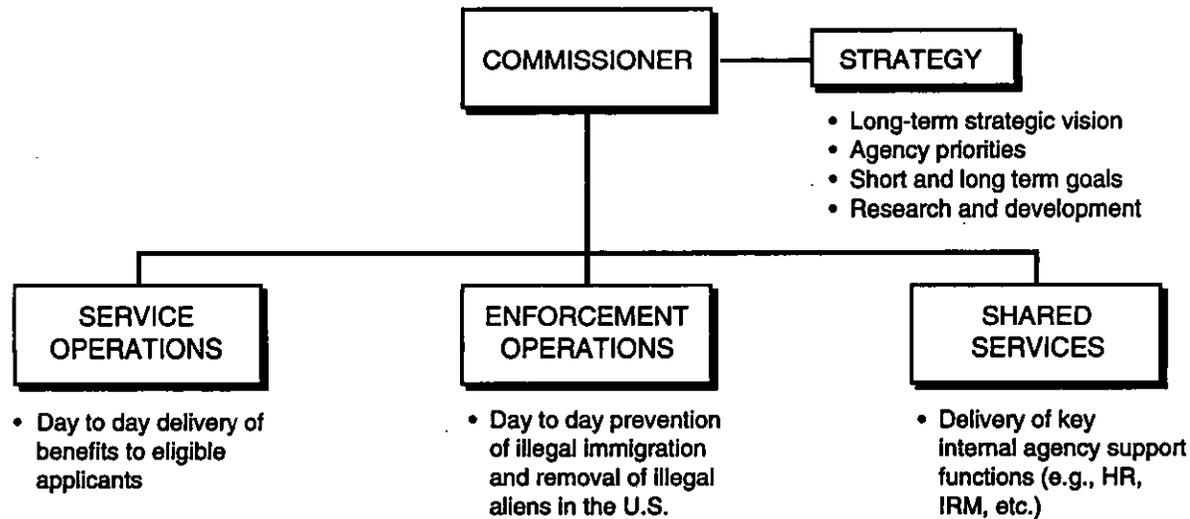


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Design...Decision Making Model...

**WE RECOMMEND PLACING R&D TOGETHER WITH STRATEGY TO CLOSELY LINK THESE ACTIVITIES—THIS COMBINED GROUP WOULD HAVE A SMALL PERMANENT STAFF**

**HIGH-LEVEL ORGANIZATION DESIGN**



FSCH993-002-040Wb

*Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations*

**THIS GROUP SERVES AS AN INTEGRATIVE MECHANISM BETWEEN SERVICE AND ENFORCEMENT—BUT IS NOT INVOLVED IN OPERATIONS**

**PLACING STRATEGY AND R&D AT THE COMMISSIONER LEVEL CREATES A CLEAR DELINEATION OF ACCOUNTABILITIES SEPARATING STRATEGIC DECISION SETTING AND R&D FROM EXECUTION**

IMPERATIVE	SCORING			RATIONALE
	R&D IN OPERATIONS	R&D IN STRATEGY	SEPARATE R&D UNIT	
1. Develop clear lines of accountability				• R&D in Strategy facilitates alignment of R&D with INS-wide strategy
2. Create customer-oriented service capabilities				• R&D in Operations better enables the linkage between R&D and development of customer-service capabilities in operations
3. Build professional capabilities in enforcement and service				• R&D in Strategy strengthens the tie between strategic assessment of capability needs and development of new capabilities based on INS-wide prioritization
4. Fulfill the INS mission: to uphold the immigration laws				• R&D in Strategy maximizes the linkage between R&D activities and INS-wide strategy

<i>Best Fit With Imperatives</i>	<i>Above Average Fit</i>	<i>Average Fit</i>	<i>Below Average Fit</i>	<i>Worst Fit With Imperatives</i>
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Design...High-Level...

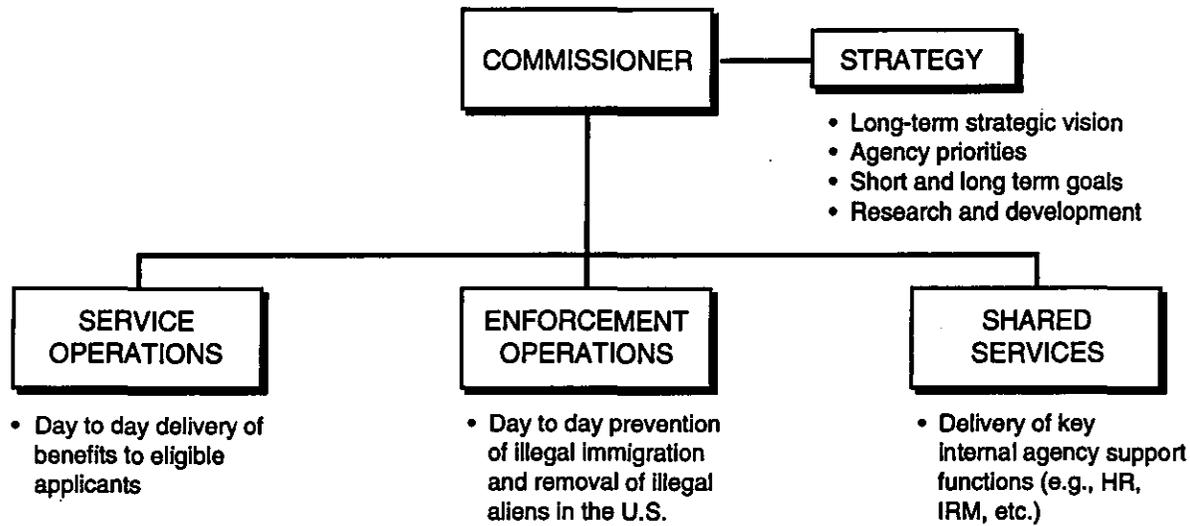
**WORK IN PROGRESS--PAGES ON PLACEMENT OF GENERAL COUNSEL, CONGRESSIONAL RELATIONS, INTERNAL AUDIT, PUBLIC RELATIONS**

- Being developed...

Design...High-Level...

**HAVING MADE DECISIONS ON PRIMARY AXIS AND HIGH-LEVEL DECISION MAKING AUTHORITY, WE HAVE CREATED THE HIGH-LEVEL ORGANIZATION CHART FOR INS**

**HIGH-LEVEL ORGANIZATION DESIGN**



FSCH993-002-040Wb

*Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations*

**THE FOLLOWING SECTION FURTHER DESCRIBES EACH OF THE 3 OPERATING UNITS**

#### **IV. DETAILED DESCRIPTION OF ORGANIZATION UNITS**

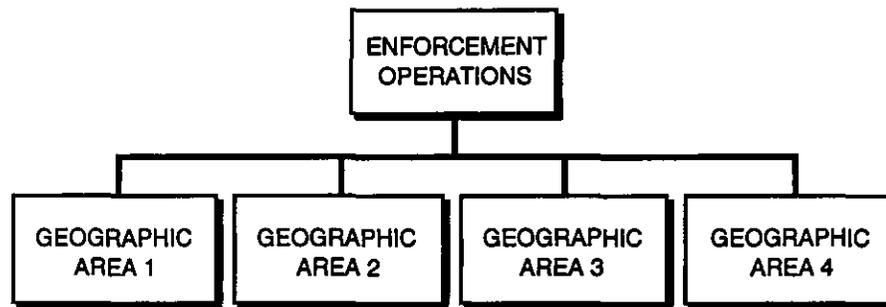
- ENFORCEMENT**
- SERVICE**
- SHARED SERVICES**

Detail...Enforcement...

## ENFORCEMENT OPERATIONS COULD BE ORGANIZED BY GEOGRAPHY OR FUNCTION AS ITS SECONDARY AXIS

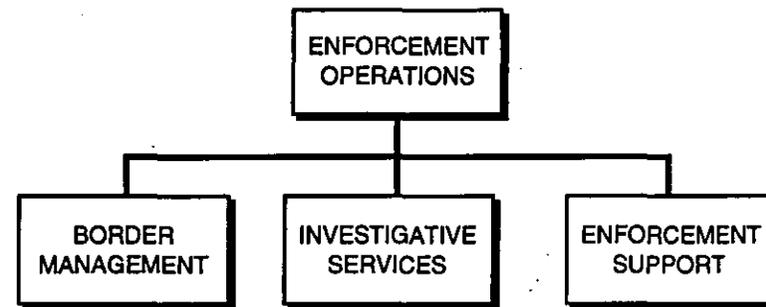
### SECONDARY AXIS – ENFORCEMENT OPTIONS

#### OPTION 1: GEOGRAPHIC



- All enforcement activities included in each geographic unit
  - Border patrol
  - Investigations
  - Intelligence
  - Detention and deportation
- Geographic boundaries would need to be re-drawn (current sectors and districts do not map neatly onto one another)
- Model similar to FBI

#### OPTION 2: FUNCTIONAL



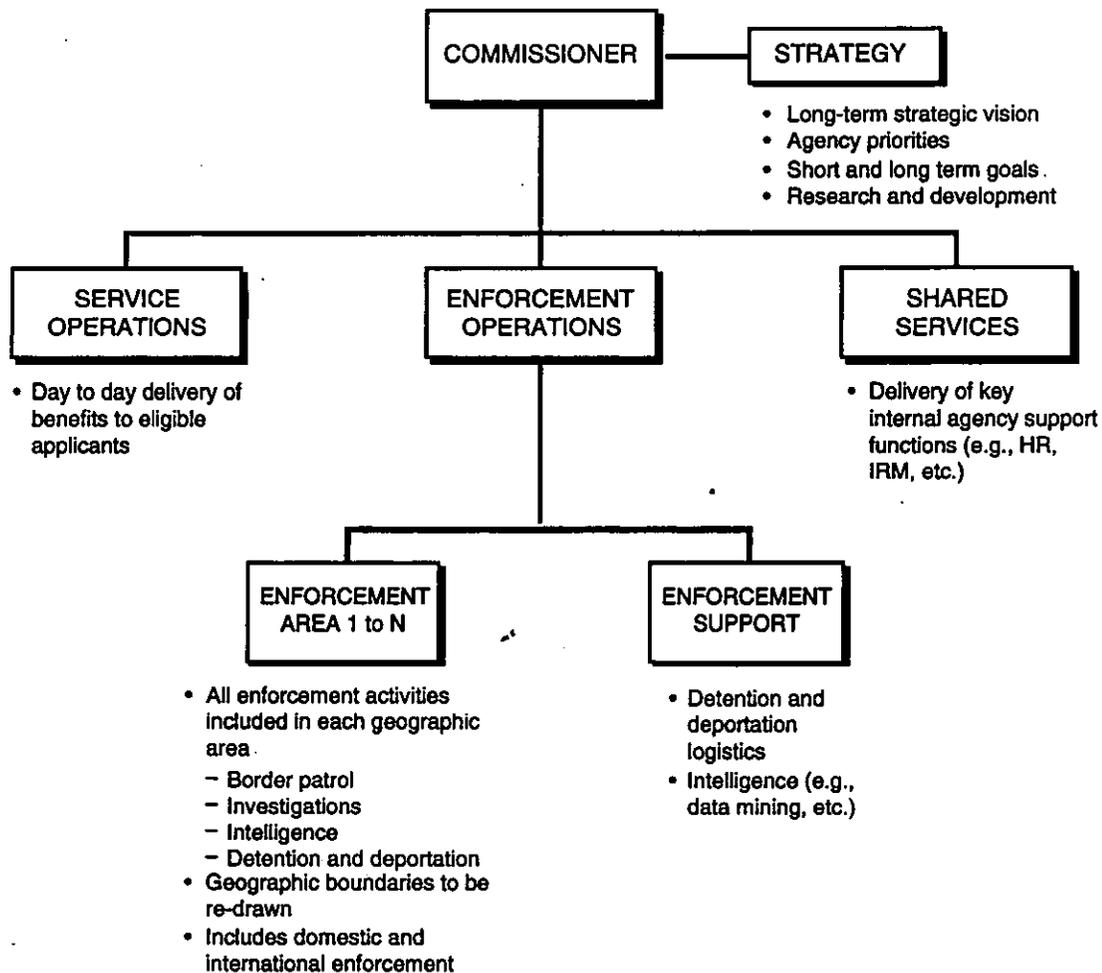
- Border patrol
- Inspections at ports of entry
- Investigations
- Intelligence
- Deportation functions
- IHP
- International
- Detention and deportation logistics
- Intelligence
- Bulk case processing

RPCH993-002-027WW

Detail...Enforcement...

## EFFECTIVE EXECUTION OF INTEGRATED ENFORCEMENT ACTIVITIES ARGUES FOR GEOGRAPHIC ALIGNMENT AT THE NEXT LEVEL, WITH SOME SHARED SUPPORT

### ENFORCEMENT STRUCTURE: RECOMMENDED OPTION

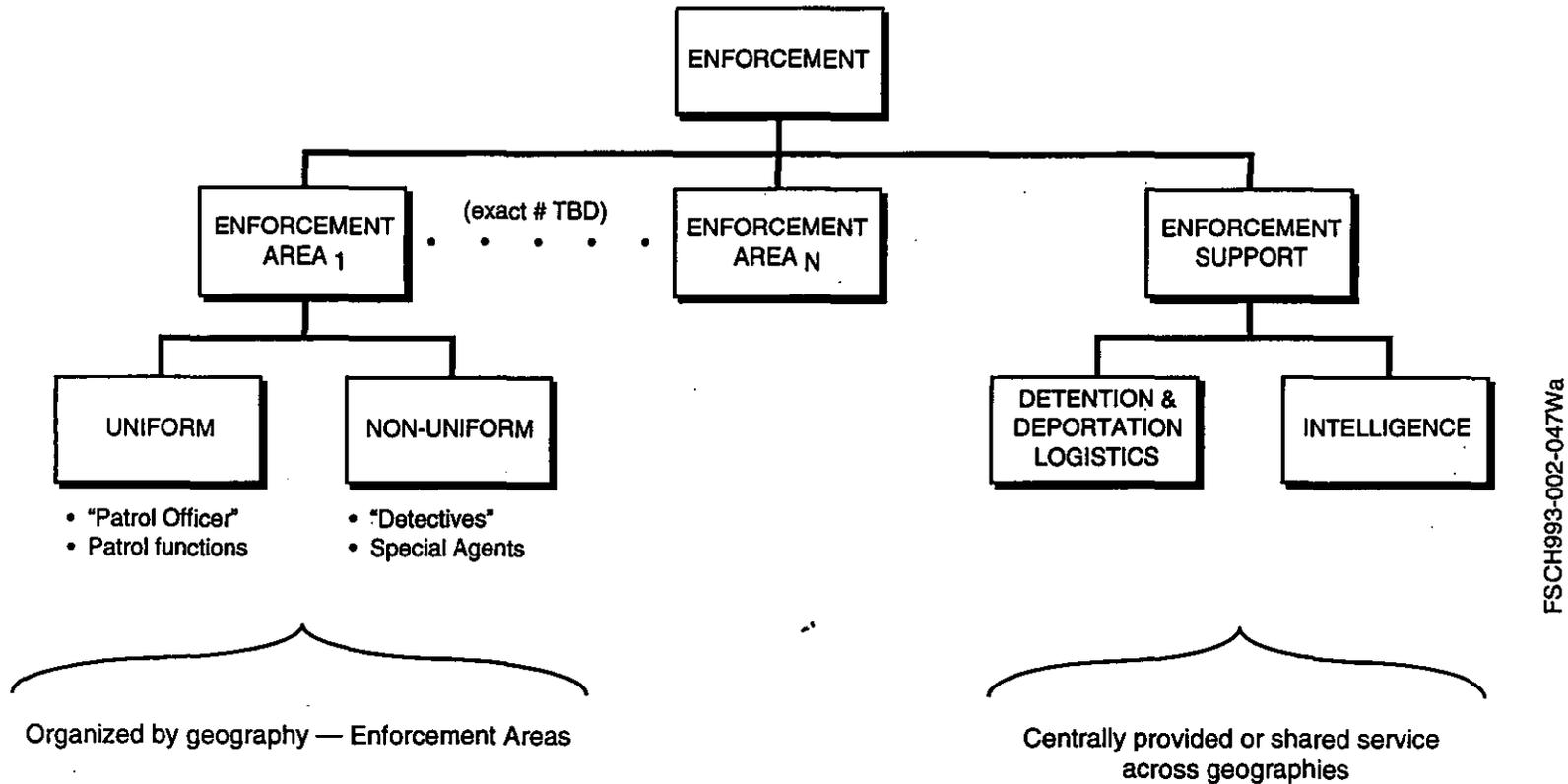


*Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations*

FSCH993-002-028Wa

Detail...Enforcement...

**A SINGLE LEADER WOULD HAVE RESPONSIBILITY FOR ALL ENFORCEMENT ACTIVITIES IN HIS/HER ENFORCEMENT GEOGRAPHIC AREA**



FSCH993-002-047Wa

Detail...Enforcement...

**THE KEY QUESTION FOR DEBATE INVOLVES PLACEMENT OF INSPECTORS INTO EITHER THE SERVICE OR ENFORCEMENT OPERATIONS--WORK IN PROGRESS**

- Work in progress--talk about options--1) all inspectors as enforcement 2) break inspectors into two pieces (one part stays in enforcement, the other goes to service)

Detail...Enforcement...

## **TO ARRIVE AT A RECOMMENDATION FOR PLACEMENT, WE ANALYZED THE PRIMARY AND SECONDARY TYPES OF WORK PERFORMED BY INSPECTORS**

- Land Border Port of Entries
  - Primarily work in an uncontrolled environment - possibility for physical harm at every encounter
  - Primarily law enforcement concerning fraud detection, papering for prosecution, arrest and detention, inspector for illegal activities
  - Minor work stream (in terms of volume) replacing identification cards, validating visas and BCCs and providing forms
    - .. Done as a courtesy since District office is open only 8-10 hours per day and the POE is open 24 hours per day
  
- POEs at airports
  - A more controlled environment - metal detectors, security, pre-flight checks, other officers from various agencies around
  - Primarily processing visas, providing information and forms
  - Secondary workstream is fraud identification, expedited removal decisions, and voluntary removal process

Detail...Enforcement...

**INSPECTORS OPERATING IN UNCONTROLLED ENVIRONMENTS WHERE THE PRIMARY FUNCTION IS ENFORCEMENT SHOULD BE CONSIDERED PART OF ENFORCEMENT OPERATIONS**

- Uncontrolled environment involves a higher risk of potential physical harm
  - Land border POEs and marine (?) POEs are examples
- Combine land border inspectors with Border Patrol to create a border management function responsible for the entire border
- Land Border POEs will be staffed by both enforcement and service staff
  - Customer service will be staffed by service personnel around the clock
  - POE facilities can be segregated into service and enforcement areas

Detail...Enforcement...

**INSPECTORS IN CONTROLLED ENVIRONMENTS SUCH AS AIRPORTS ARE PRIMARILY FOCUSED ON PROVIDING SERVICES AND SHOULD BE PART OF SERVICE OPERATIONS...**

- Airport inspectors would continue to be trained to detect fraud
- 99% of work is providing a service to allow individuals into the country
- Mechanisms for hand-offs to Detention officers must be determined

Detail...Enforcement...

## **THE NEW ENFORCEMENT STRUCTURE REQUIRES A REDEFINITION OF GEOGRAPHIC MANAGEMENT BOUNDARIES**

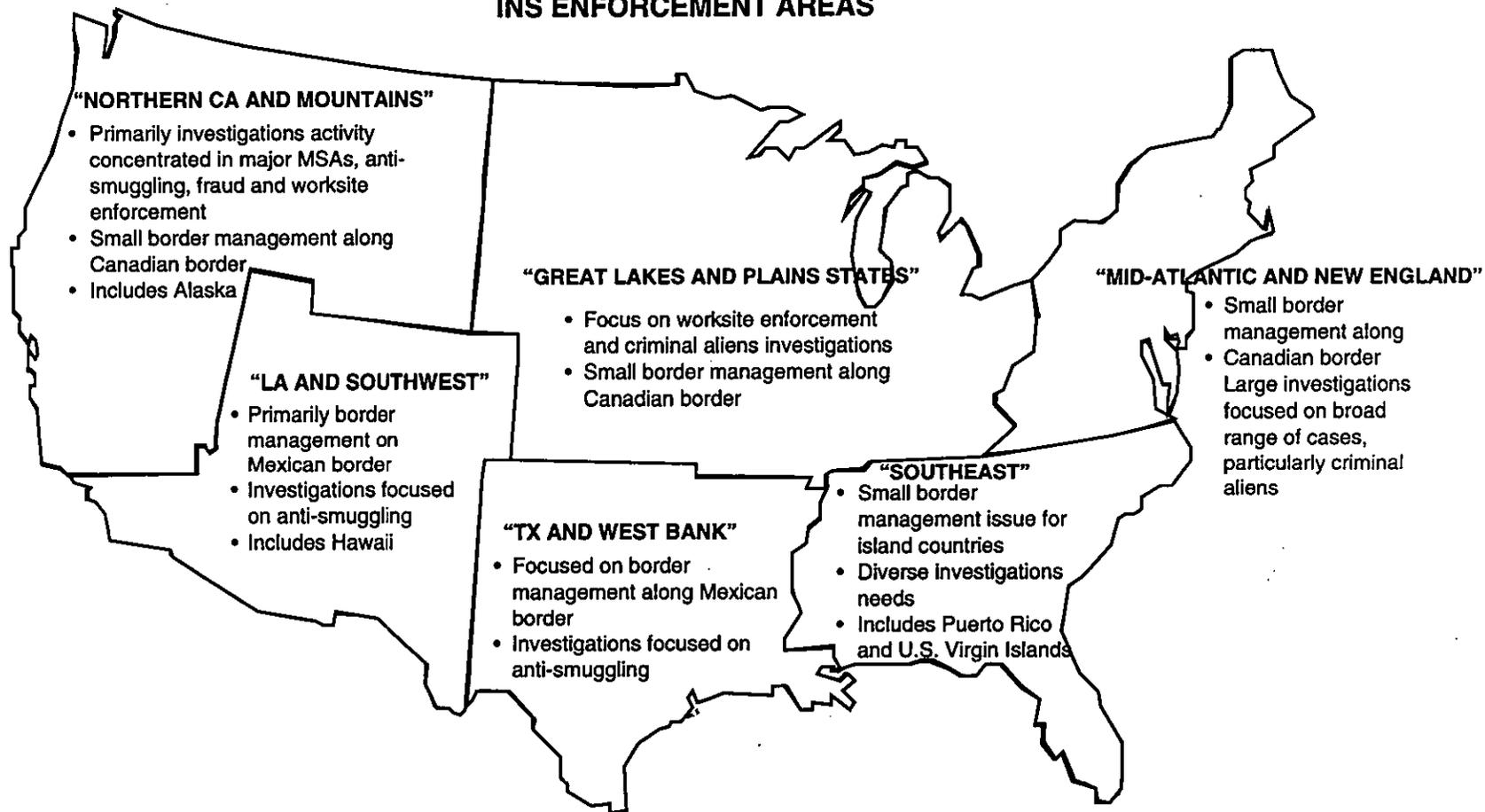
- The current structure is fragmented—33 districts and 21 sectors result in 54 different organization units
- Districts do not align clearly with Border Patrol sectors, so geographic boundaries overlap
- Current Regional Directors' (RD) management spans are too large to effectively monitor operating performance
  - Regional Directors have between 21 and 24 direct reports
  - A Region covers a very large geographic boundary corridor from the Canadian border to the southern border, requiring a good deal of constant travel to keep in touch with field operations under a RD's control
- Current regional and district boundaries have vastly different workloads and community service needs
  - Midwestern/interior areas focus on criminal aliens
  - South focuses on border management operating performance

Detail...Enforcement...

**NEW GEOGRAPHIC MANAGEMENT BOUNDARIES FOR ENFORCEMENT OPERATIONS SHOULD BE REDRAWN BASED UPON A NUMBER OF CRITERIA**

<b>CRITERIA USED TO DRAW GEOGRAPHIC BOUNDARY</b>	<b>DESCRIPTION/RATIONALE</b>
• Similarity of local enforcement needs	• Primary focus of enforcement activity within a given geography may differ—border management vs. criminal aliens, etc.
• Footprints of other law enforcement agencies (including the court system)	• INS boundaries should facilitate integration with other local, state, and federal law enforcement agencies, as well as relevant judicial entities
• Nature of demand	• Volumes by type of enforcement activity • Immigration patterns/migration flows
• “Manageability” of the geographic area	• Size of geographic area • Ease of management oversight—minimize the amount of excessive travel required

## INS ENFORCEMENT AREAS



*Note: International enforcement resources likely to constitute a separate geographic area; further analysis required*

FSCH993-002-057Map

Detail...Enforcement...

**USING THESE CRITERIA, WE DEVELOPED 6 PRELIMINARY GEOGRAPHIC MANAGEMENT AREAS FOR ENFORCEMENT (SEE FACING EXHIBIT)**

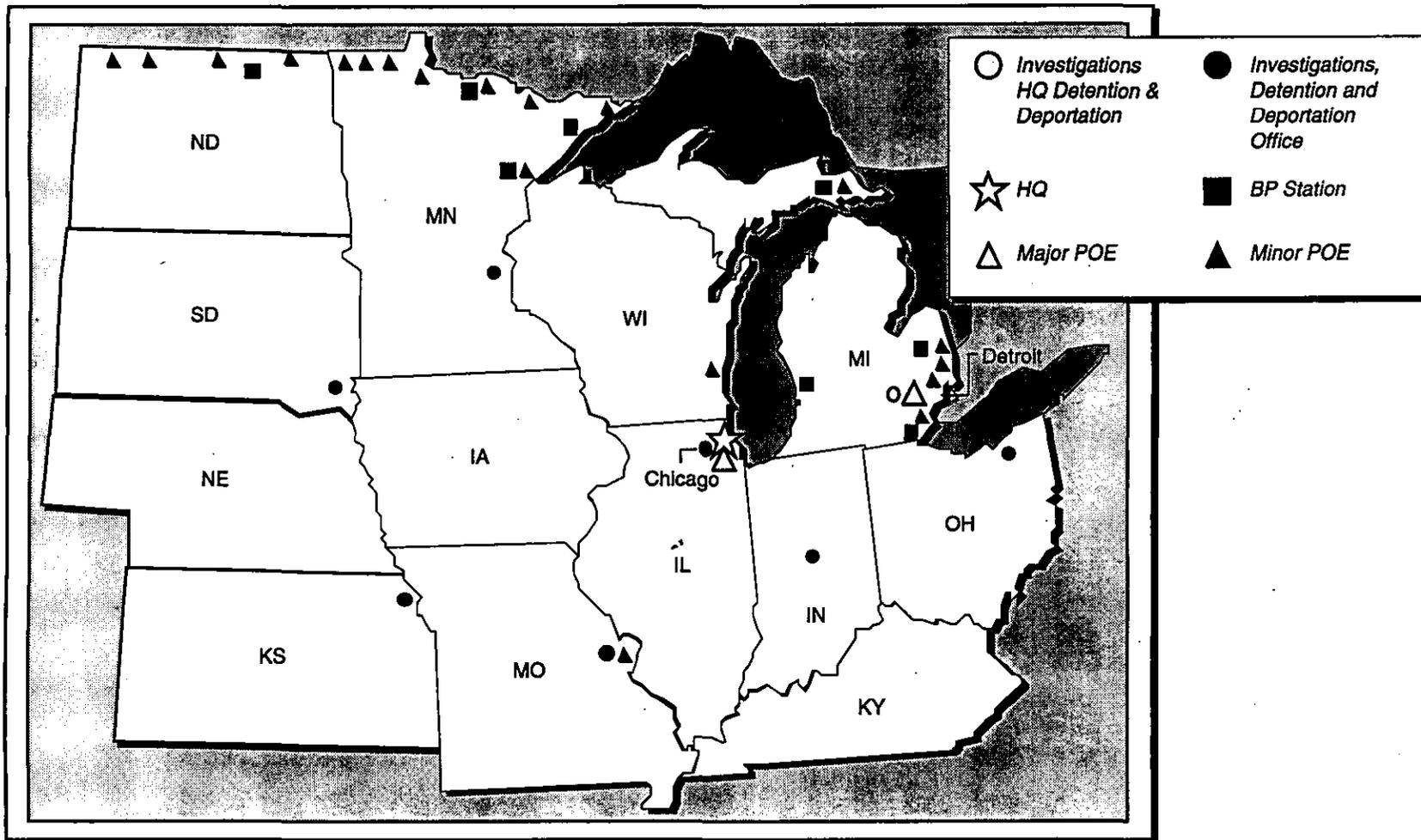
- INS estimates indicate that most illegal aliens are concentrated in 5 states (California, New York, Texas, Illinois, Florida)
- Boundaries need to be bigger than the current district/sector structure to serve as an effective management layer to monitor operations...
- ...Yet boundaries should not be so big that they can only serve as a buffer between the field and headquarters (i.e., smaller than today's regions)
- While illegal immigration patterns should be considered in re-drawing these boundaries, this factor should be only one criterion used
  - Hypothesis is that it may be impossible to draw lines to perfectly capture immigration flows—no perfect solution exists
  - Consideration of other criteria, most importantly the “manageability” factor, would suggest that drawing a North-South corridor boundary (similar to the Regions today) is less than optimal—excessive travel required to manage effectively

**A DETAILED ANALYSIS NEEDS TO BE PERFORMED TO DEFINE EXACT BOUNDARIES AND TO INVOLVE FIELD OPERATIONS IN THIS DECISION TO ENSURE BUY-IN**

Detail...Enforcement...

**THE FOOTPRINT FOR ENFORCEMENT GEOGRAPHIES COULD THEN BE DRAWN WITH DIFFERENT TYPES OF LOCAL OPERATIONS AS REQUIRED TO SERVE COMMUNITY NEEDS**

**ILLUSTRATIVE FOOTPRINT: GREAT LAKES ENFORCEMENT AREA**

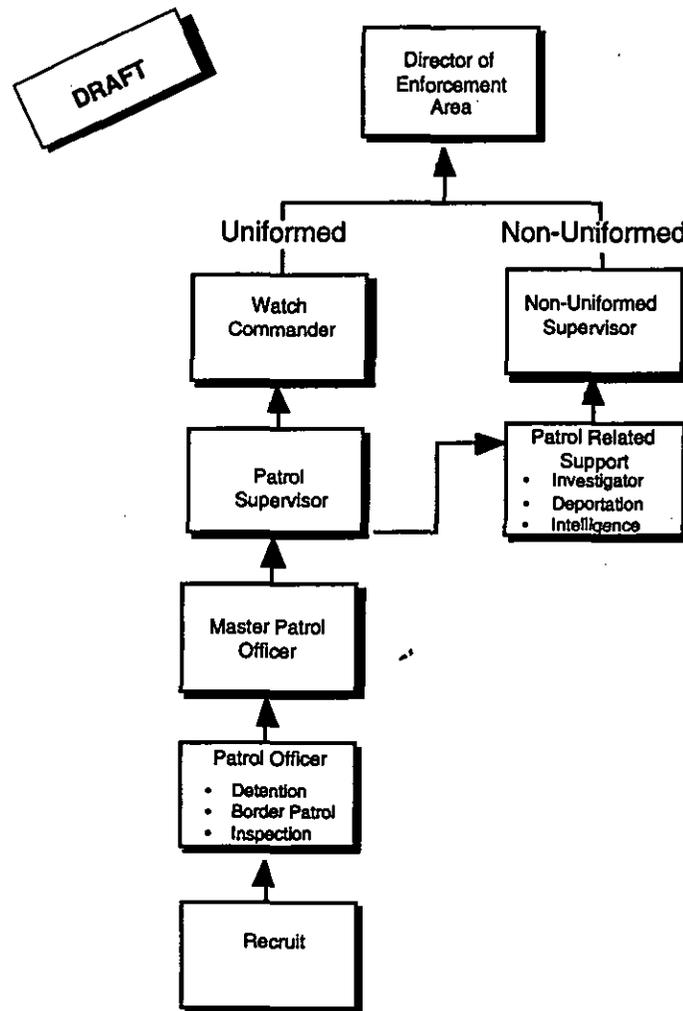


FSCH993-002-048M

Detail...Enforcement...

## THE INTEGRATED ENFORCEMENT MODEL PROMOTES A NATURAL CAREER PROGRESSION FOR ENFORCEMENT PROFESSIONALS

### THE NEW ENFORCEMENT AREA CAREER PATH



Detail...Enforcement...

**REGARDLESS OF WHERE ONE PLACES INSPECTORS, THIS INTEGRATED ENFORCEMENT MODEL ADHERES TO BEST PRACTICE PRINCIPLES FOR LAW ENFORCEMENT AGENCIES (CHART TO BE REPLACED WITH BENCHMARKING RESULTS--MORE CONCRETE DATA)**

PRINCIPLE	DESCRIPTION
Professionalism	<ul style="list-style-type: none"> <li>• Instill a professional culture – give and get respect</li> <li>• Instill pride in facilities, fellow officers and in the community</li> <li>• Standardize organizational structure, responsibilities, procedures, appearance and behavior</li> </ul>
Accountability	<ul style="list-style-type: none"> <li>• Establish accountability for all personnel, at all levels</li> <li>• Meet enforcement needs whenever and wherever needed</li> <li>• Take responsibility for individual and collective actions</li> <li>• Redefine supervisor’s role and increase supervisory power</li> </ul>
Efficiency / Effectiveness	<ul style="list-style-type: none"> <li>• Maximize use of internal and community resources</li> <li>• Put more officers on the street</li> </ul>
Quality	<ul style="list-style-type: none"> <li>• Ensure the highest quality in all processes, procedures and requirements</li> <li>• Ensure that all supervisors have the ultimate responsibility for quality control</li> </ul>
Recognition / Reward	<ul style="list-style-type: none"> <li>• Encourage and reward excellence and innovation</li> <li>• Create conditions that will earn INS positive publicity</li> </ul>
Clear Roles Responsibilities	<ul style="list-style-type: none"> <li>• Clearly define roles and responsibilities of all organizational elements</li> <li>• Ensure roles and responsibilities are aligned with organizational goals</li> </ul>

Detail...Enforcement...

**THE NEW ENFORCEMENT STRUCTURE, WITH A SINGLE LEADER OF ENFORCEMENT IN A GEOGRAPHIC AREA RESPONSIBLE FOR ALL ENFORCEMENT ACTIVITIES, BEST SATISFIES THE ORGANIZATIONAL IMPERATIVES**

IMPERATIVE	SCORING		RATIONALE
	FUNCTION	GEOGRAPHY	
1. Develop clear lines of accountability			<ul style="list-style-type: none"> <li>The geographic model creates a single, clear chain of command superior to the functional model—it does not create silos within the enforcement organization</li> </ul>
2. Create customer-oriented service capabilities	N/A	N/A	<ul style="list-style-type: none"> <li>Service orientation is extremely important in enforcement operations, but is not dependent on structure</li> </ul>
3. Build professional capabilities in enforcement and service			<ul style="list-style-type: none"> <li>Geography better enables the development of an integrated enforcement capability; care is required to maintain the current success of the Border Patrol model</li> </ul>
4. Fulfill the INS mission: to uphold the immigration laws			<ul style="list-style-type: none"> <li>Geographic organization of enforcement reduces silo-based conflict and facilitates integrated enforcement to support national priorities (e.g., targeting anti-smuggling across national and state borders—see graphic on following page)</li> </ul>

 <i>Best Fit With Imperatives</i>	 <i>Above Average Fit</i>	 <i>Average Fit</i>	 <i>Below Average Fit</i>	 <i>Worst Fit With Imperatives</i>
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**IV. DETAILED DESCRIPTION OF ORGANIZATION  
UNITS**

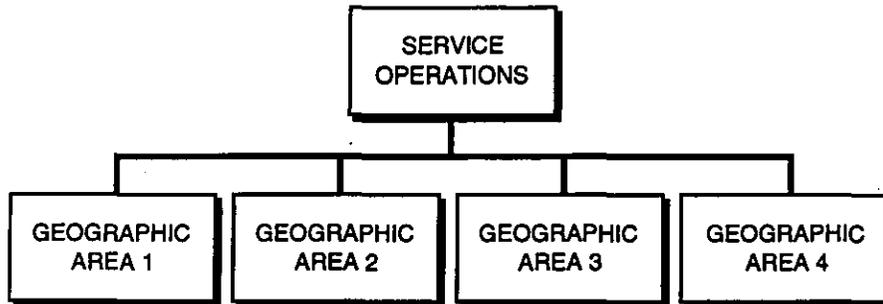
- ENFORCEMENT
- SERVICE
- SHARED SERVICES

Detail...Service...

## THE TWO BEST OPTIONS FOR THE SECONDARY SERVICE AXIS ALSO APPEAR TO BE EITHER A GEOGRAPHIC OR FUNCTIONAL FOCUS

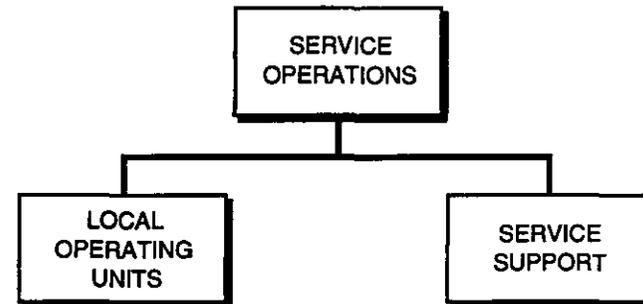
### SERVICE SECONDARY AXIS – OPTIONS

#### OPTION 1: GEOGRAPHIC



- All service activities included in each geographic unit
  - Adjudications
  - Interviews
  - Fingerprinting
  - Asylum
  - Etc.
- Four service centers would be aligned with a geographic area

#### OPTION 2: FUNCTIONAL



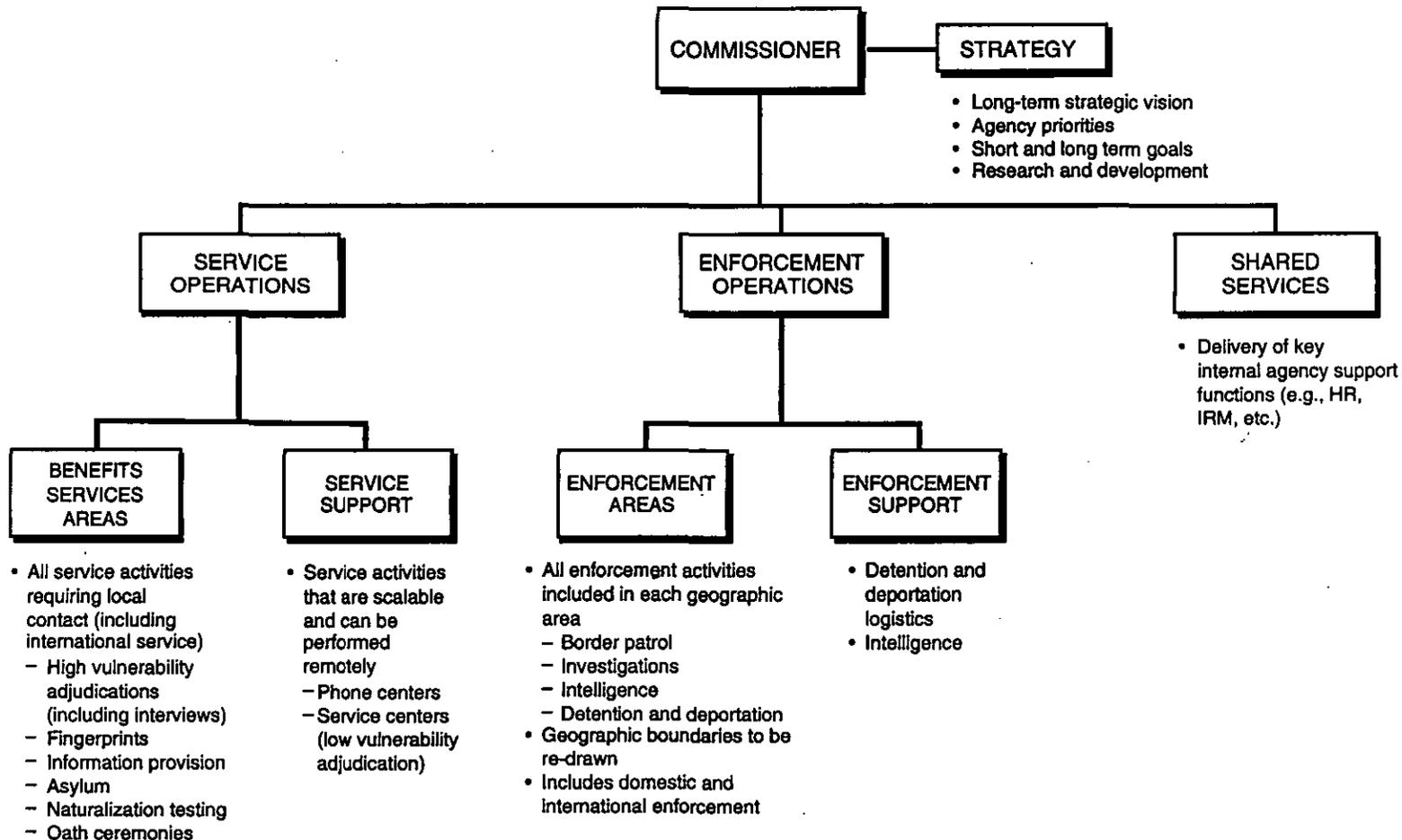
- All service activities that require local contact
  - 2nd phase adjudications (including interviews)
  - Fingerprints
  - Information provision
  - Asylum
  - NATZ testing
  - Other activities—TBD
- Service activities that are scalable and can be performed remotely
  - Phone centers
  - Service centers (bulk adjudication)
  - Other support tied to service—TBD

RPCH993-002-029WW

Detail...Service...

## BALANCING WORKLOAD AND EFFICIENCY OF OPERATIONS ARGUES FOR FUNCTIONAL ALIGNMENT AT THE NEXT LEVEL FOR SERVICES

### BENEFITS STRUCTURE: RECOMMENDED OPTION

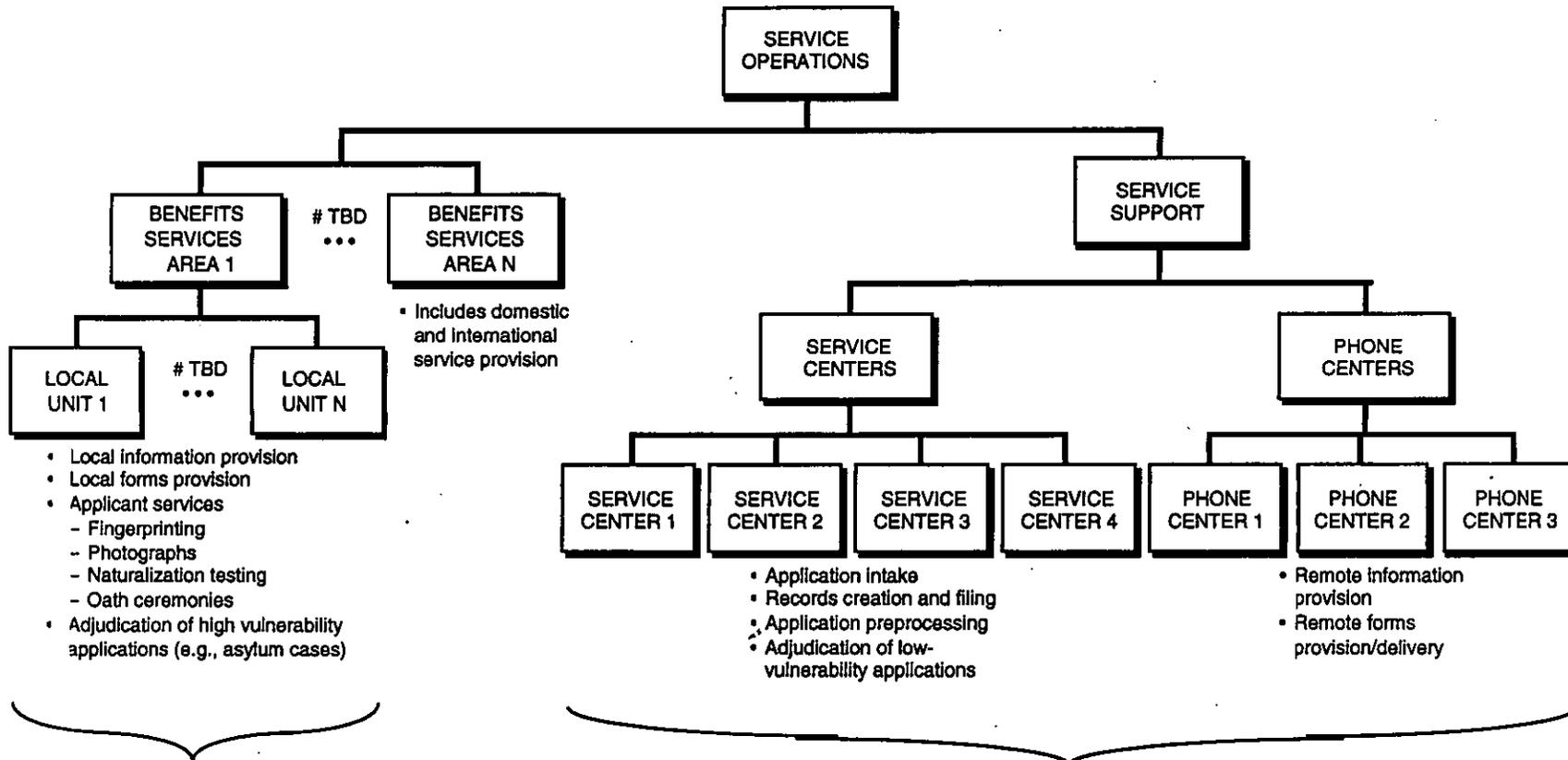


Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations

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Detail...Service...

## A LEADER OF SERVICE OPERATIONS WOULD MANAGE TWO DIVISIONS OF ACTIVITIES— LOCAL SERVICE PROVISION AND CONSOLIDATED SERVICE SUPPORT



Local provision—functions to be allocated among local offices based on specific community needs

Central provision—scale benefits and need for consistency

RPCH993-002-043W

Detail...Service...

**THE NEW SERVICE STRUCTURE WOULD REQUIRE INTEGRATION OF ACTIVITIES AND A RE-DEFINITION OF EXISTING MANAGEMENT BOUNDARIES**

- International Affairs and Asylum offices integrated into structure, not “siloed”
  
- Current and proposed operating units taken into consideration
  - District offices and sub-offices
  - Application Support Centers (ASCs)
  - 4 Service Centers
  - Phone Centers

Detail...Service...

**DRAWING NEW MANAGEMENT BOUNDARIES FOR REMOTE SERVICE PROVISION ACTIVITIES IS DESIRABLE TO FACILITATE INTERACTION WITH LOCAL OPERATING UNITS**

- The 4 Service Center areas should be re-drawn to support the new local operating unit structure
- Phone Centers and call routing methodologies will need to be re-examined for the same reason
- The agency should seriously consider re-location of Phone Centers to lower cost geographies—best practice commercial organizations tend to select more remote, low cost geographies (e.g., Utah, Arizona, South Dakota)

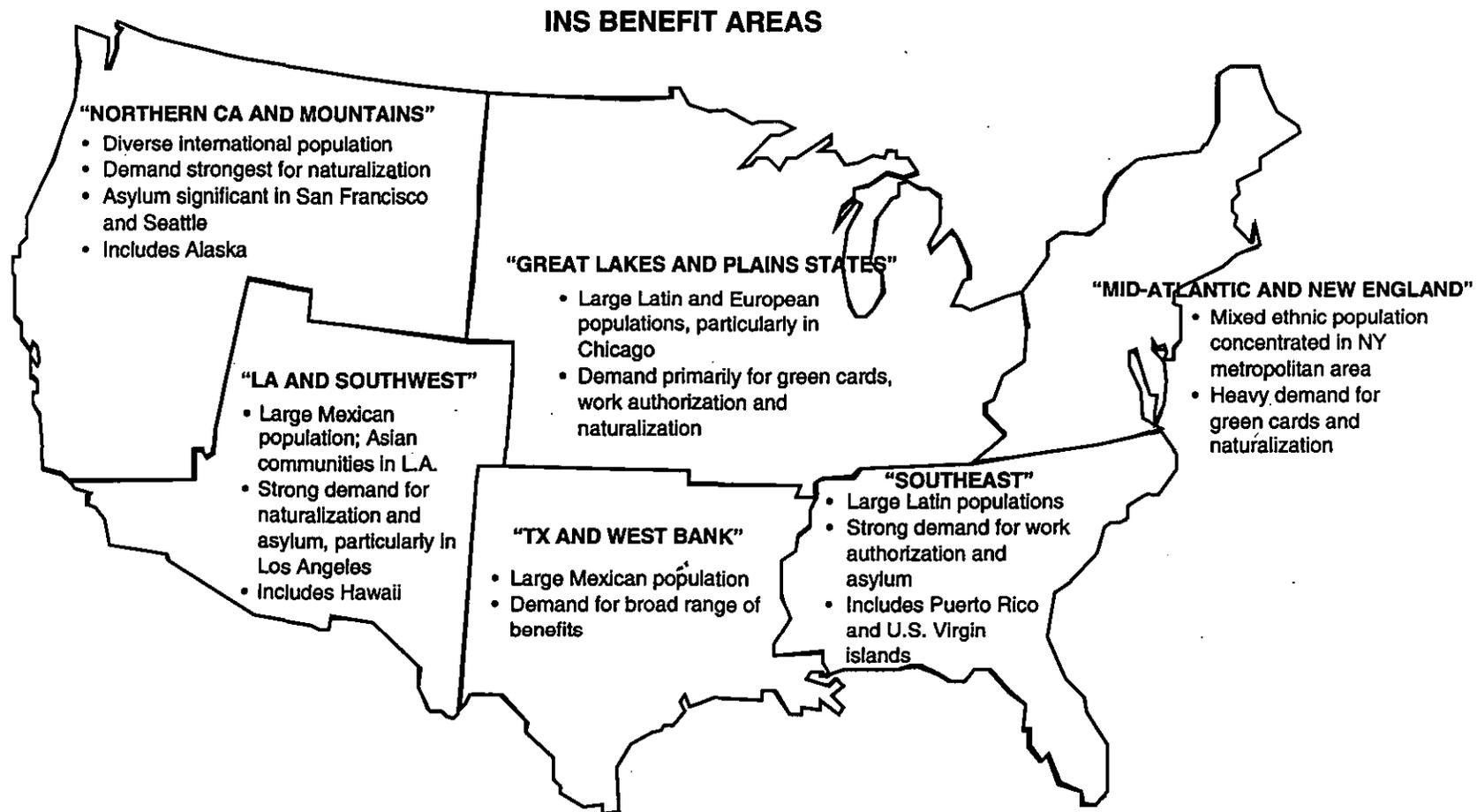
Detail...Service...

**NEW GEOGRAPHIC MANAGEMENT BOUNDARIES SHOULD FOCUS ON NEEDS OF LOCAL COMMUNITIES—ONE CAN EMPLOY SIMILAR CRITERIA AS THOSE USED TO DRAFT ENFORCEMENT BOUNDARIES**

<b>CRITERIA USED TO DRAW GEOGRAPHIC BOUNDARY</b>	<b>DESCRIPTION/RATIONALE</b>
• Similarity of local service benefit needs and communities	• Geographies have different types and concentrations of immigrant populations
• Footprints of local, state and national community groups	• INS boundaries should facilitate integration with other local, state, and national community groups
• Nature of demand	• Population concentration • Volumes by type of application • Immigration patterns/migration flows
• “Manageability” of the geographic area	• Size of geographic area • Ease of management oversight—minimize the amount of excessive travel required

Detail...Service...

**WHILE SERVICE AND ENFORCEMENT GEOGRAPHIC BOUNDARIES COULD BE DIFFERENT, AN INITIAL ANALYSIS YIELDED BOUNDARIES SIMILAR TO THE 6 ENFORCEMENT AREAS—HENCE THESE COULD BE USED**



*Note: International benefits resources likely to constitute a separate geographic area; further analysis required*

FSCH993-002-058Map

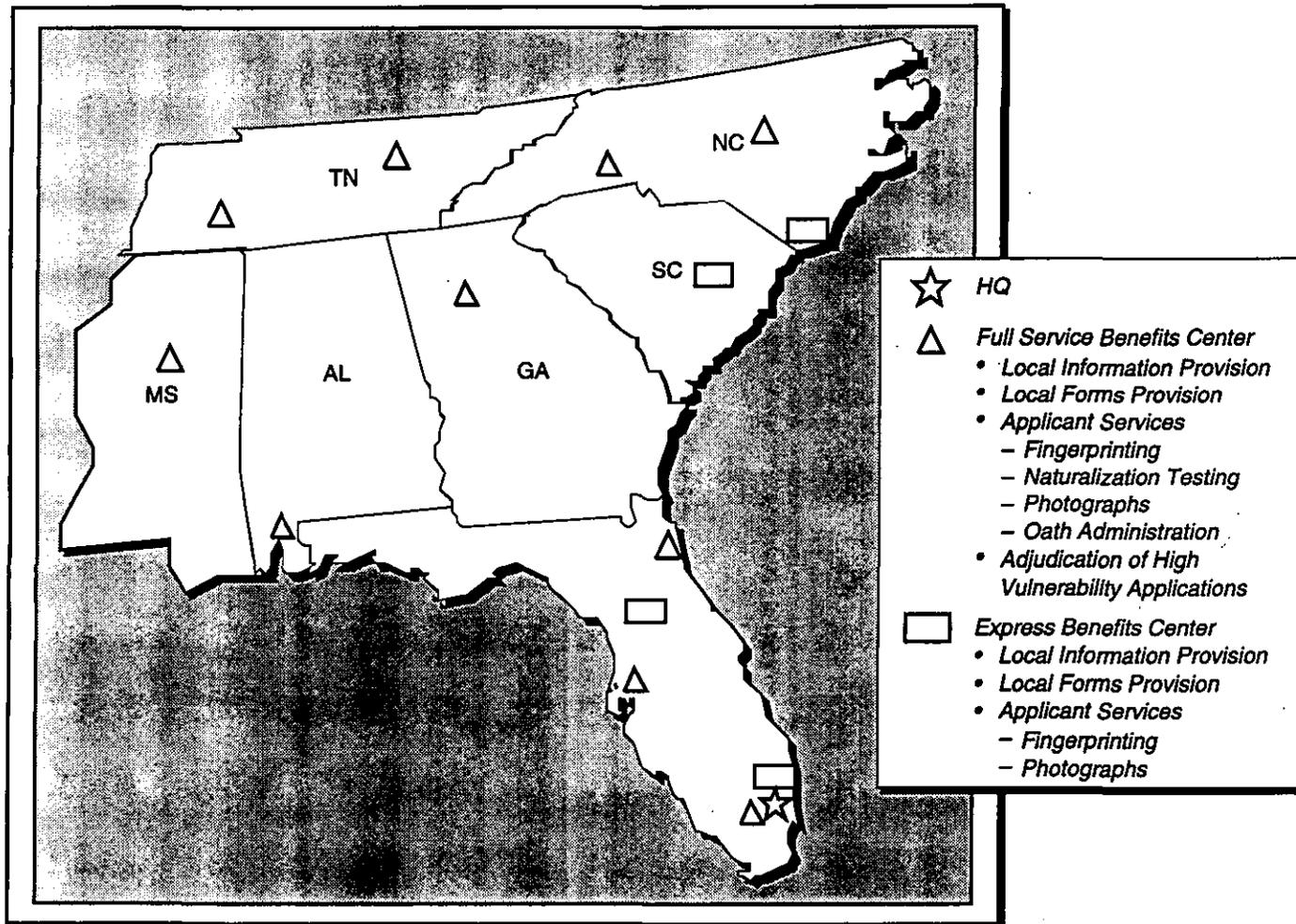
Detail...Service...

## **WORK IN PROGRESS.... HOW DOES INTERNATIONAL OPERATIONS FIT INTO THIS MODEL?**

- Could be considered a separate area
- Key decision to be made--make or buy services (e.g. SSA buys services from DOS for overseas operations)

Detail...Service...

## A "SOUTHEAST" BENEFITS SERVICES AREA COULD HAVE A NUMBER OF DIFFERENT TYPES OF OFFICES WITHIN ITS GEOGRAPHIC BOUNDARIES



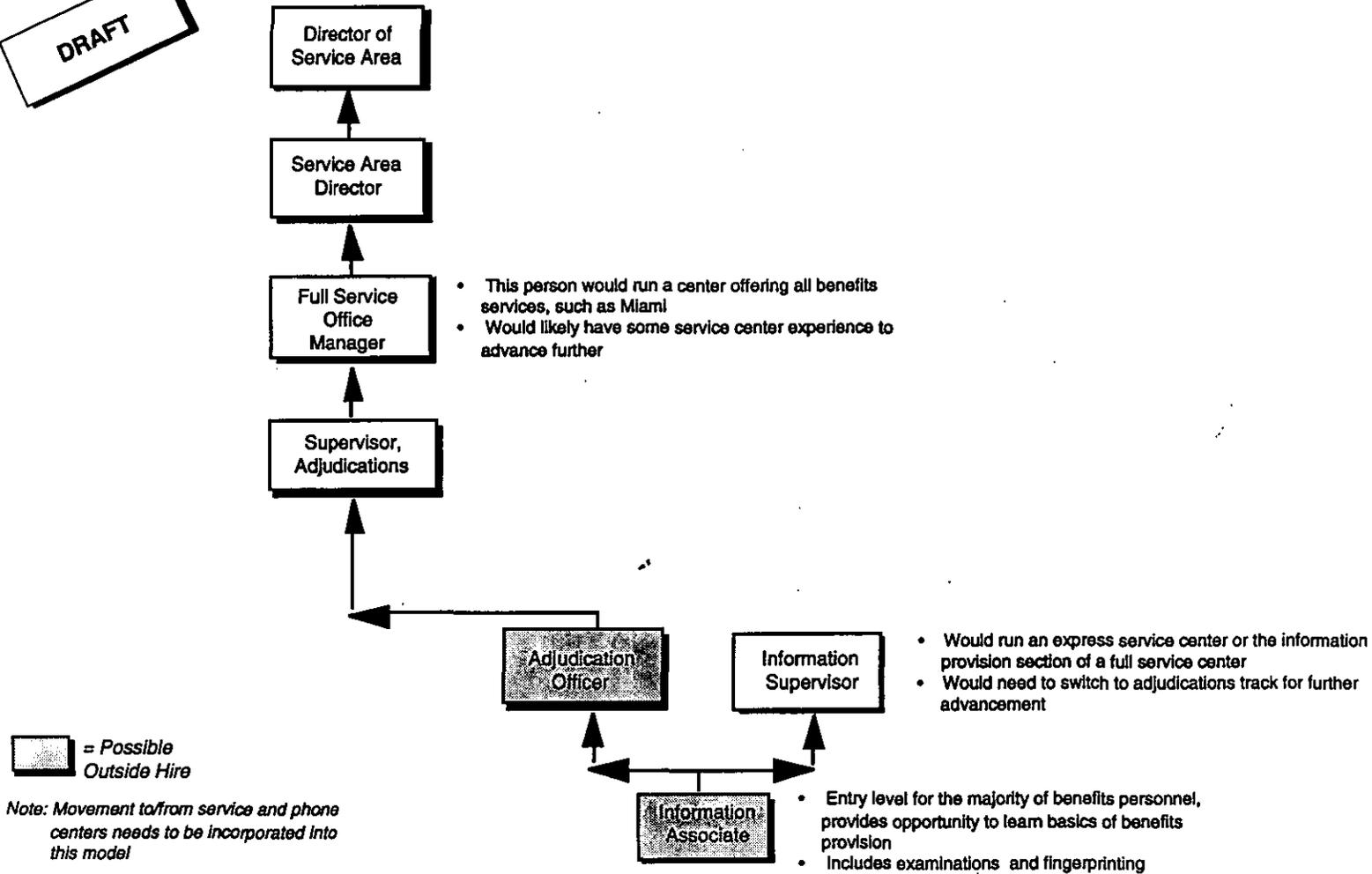
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Detail...Service...

## THIS SERVICE STRUCTURE CREATES CLEARER CAREER PATHS...

### THE NEW BENEFIT SERVICE AREA CAREER PATH

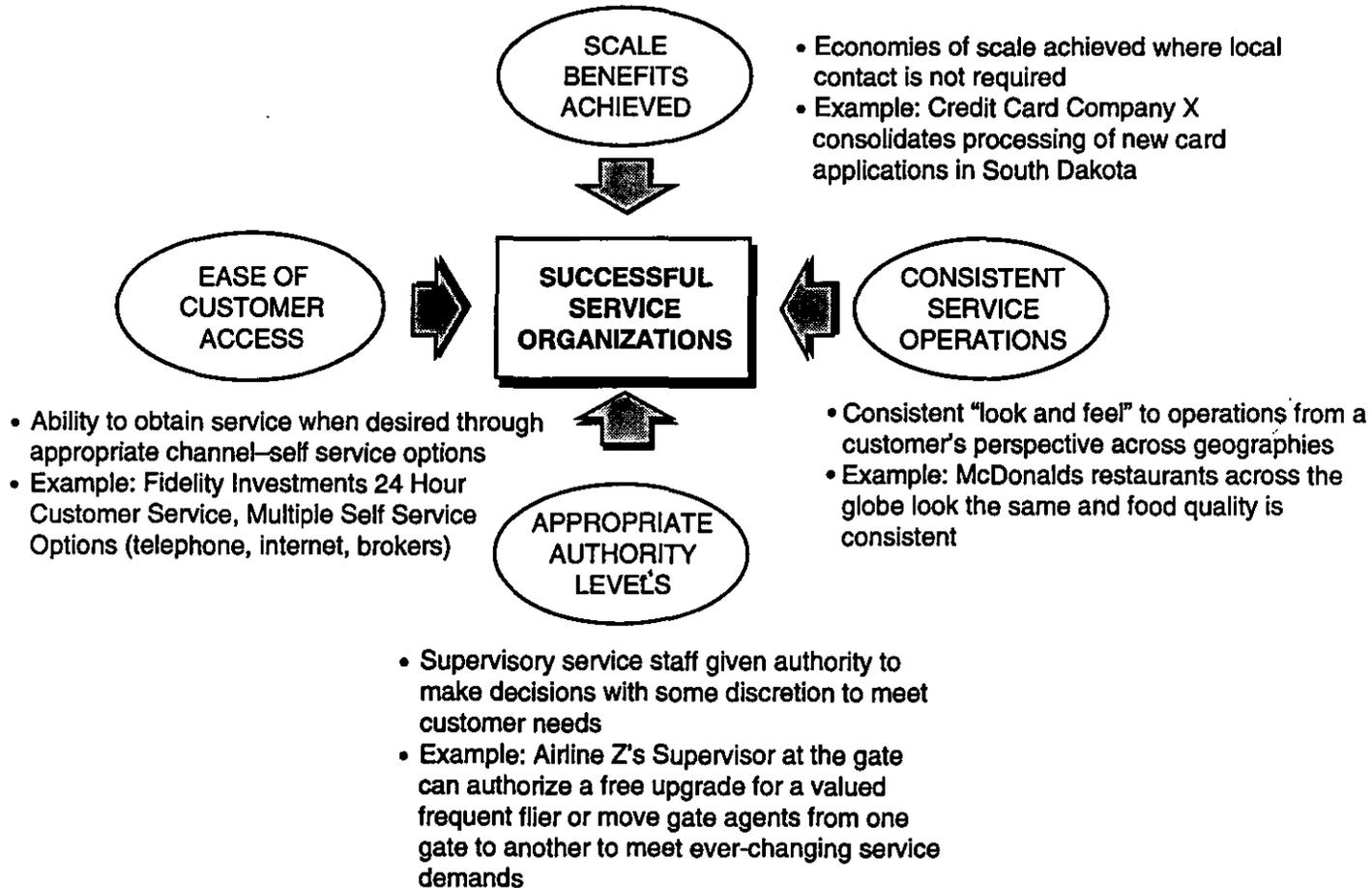
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Detail...Service...

## ...AND GREATER FOCUS THAT WILL FACILITATE INS' PURSUIT OF BEST IN CLASS SERVICE OPERATIONS CAPABILITIES

### BEST IN CLASS SERVICE OPERATIONS: SELECT ORGANIZATION ELEMENTS



Detail...Service...

**ORGANIZING SERVICE BY FUNCTION FACILITATES COORDINATED AND CONSISTENT SERVICE DELIVERY WHILE BALANCING LOCAL REQUIREMENTS WITH ECONOMIES OF SCALE**

SCORING			
IMPERATIVE	FUNCTION	GEOGRAPHY	RATIONALE
1. Develop clear lines of accountability			<ul style="list-style-type: none"> <li>Both options enable clear but different lines of accountability within a single service organization</li> </ul>
2. Create customer-oriented service capabilities			<ul style="list-style-type: none"> <li>Function is superior to geography <i>vis a vis</i> customer service since scale activities would be centralized as in successful commercial service organizations (permits balancing workload, consistent approach to managing like activities, etc.)</li> </ul>
3. Build professional capabilities in enforcement and service			<ul style="list-style-type: none"> <li>Organizing by function assigns clear responsibility for service capabilities and mitigates the risk of geographic differences</li> </ul>
4. Fulfill the INS mission: to uphold the immigration laws			<ul style="list-style-type: none"> <li>The functional model creates an additional level of "checks and balances" between local and centralized operations that reduces the potential for local community groups to improperly influence the decision making process</li> </ul>

 Best Fit With Imperatives	 Above Average Fit	 Average Fit	 Below Average Fit	 Worst Fit With Imperatives
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**IV. DETAILED DESCRIPTION OF ORGANIZATION  
UNITS**

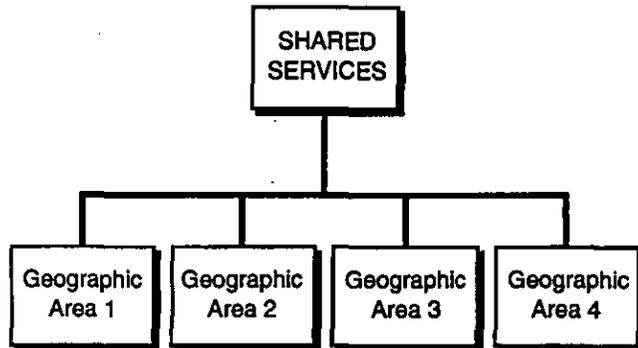
- ENFORCEMENT
- SERVICE
- SHARED SERVICES

Detail...Shared Services...

**FOR SHARED SERVICES, THE TWO BEST OPTIONS FOR THE SECONDARY AXIS APPEAR TO BE EITHER A GEOGRAPHIC OR FUNCTIONAL FOCUS**

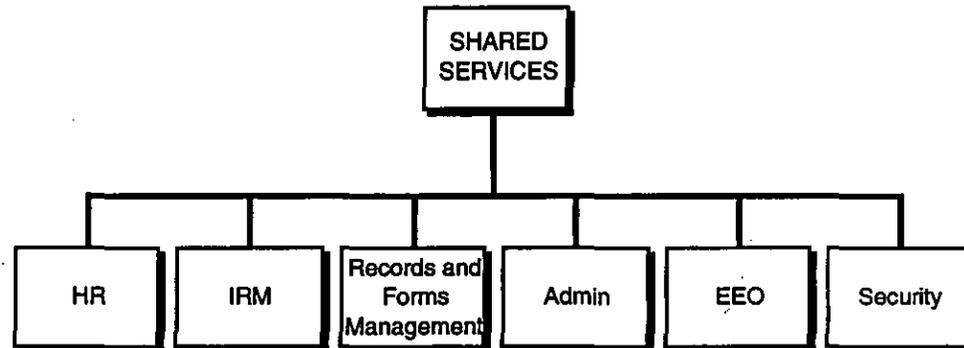
**SHARED SERVICES SECONDARY AXIS — OPTIONS**

**OPTION 1: GEOGRAPHIC**



- Organizational enablers located in and reporting to geographic offices

**OPTION 2: FUNCTIONAL**



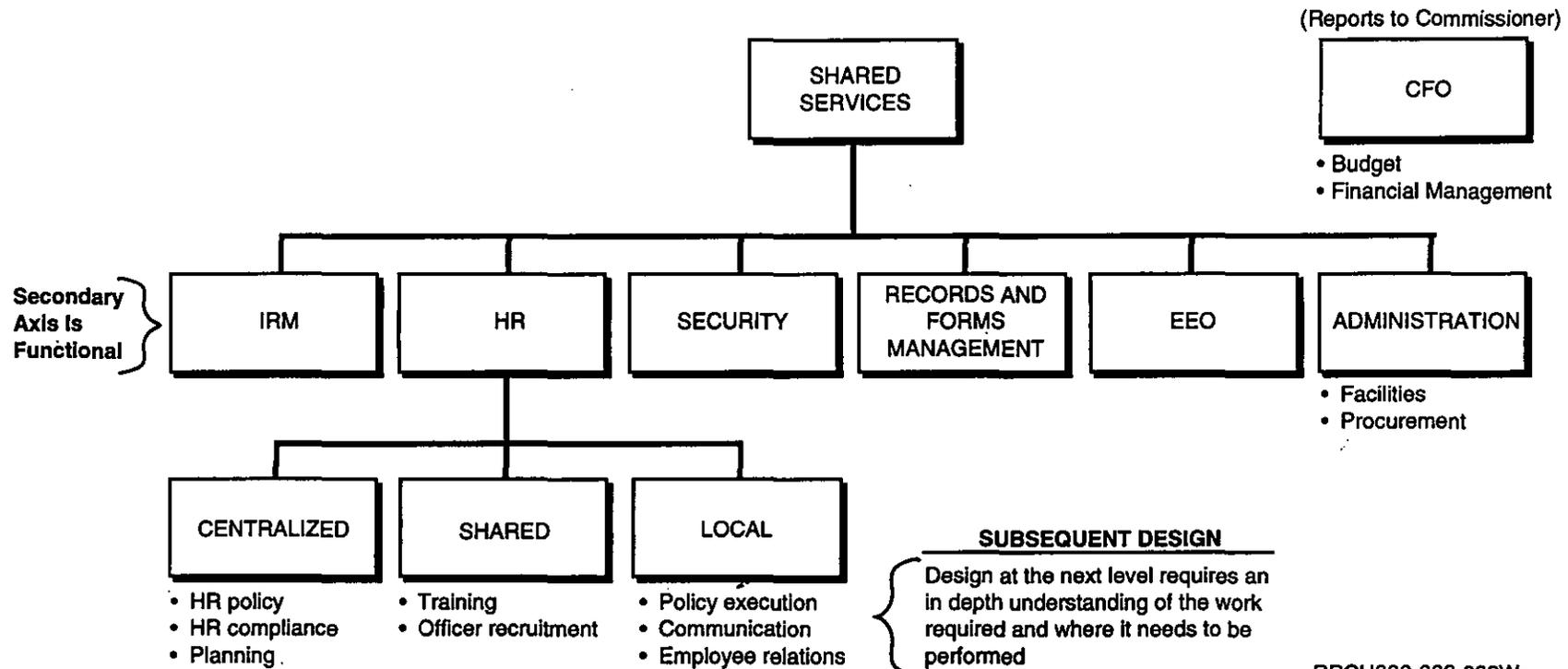
- Secondary axis is functional, with additional analysis required to determine centralized, shared and local service requirements

FSCH993-002-034WW

Detail...Shared Services...

## AGAIN, BALANCING OF WORKLOAD AND EFFECTIVENESS ARGUE FOR A FUNCTIONAL ALIGNMENT OF SUPPORT AT THE NEXT LEVEL, IN A SHARED SERVICES MODEL

### SHARED SERVICES: RECOMMENDED OPTION



RPCH993-002-032Wa

Detail...Shared Services...

**A KEY ASSUMPTION IN THIS MODEL IS THAT SUPPORT ACTIVITIES ARE PUSHED DOWN AS FAR AS POSSIBLE WHILE RETAINING CHECKS AND BALANCES—IT IS A KEY ENABLERS**

- **Work in progress**--explain why shared services is on the same level in the organization as operations--need influence in the agency (similar to corporate best practices)
- Need checks and balances...
- This area provides operational integration across service and enforcement operations (records and forms management) and prevents duplication of support activities--a danger if we separate service and field operations
- This concept could be used to share support activities with other DOJ agencies as well (like JPACS)

Detail...Shared Services...

**A SHARED SERVICES MODEL BALANCES THE NEED FOR LOCAL MANAGEMENT OF CERTAIN SUPPORT ACTIVITIES WITH ECONOMIES OF SCALE WHILE CREATING APPROPRIATE CHECKS AND BALANCES**

SCORING			
IMPERATIVE	FUNCTION	GEOGRAPHY	RATIONALE
1. Develop clear lines of accountability	●	◐	• Function provides clear accountability for shared services policy at headquarters and reduces risk of geographic differences
2. Create customer-oriented service capabilities	◑	○	• A geographic model only exacerbates current difficulties in developing support systems to enable best-in-class customer service delivery
3. Build professional capabilities in enforcement and service	●	○	• Functional organization facilitates enterprise-wide shared services delivery, whereas the geographic option inhibits the development of broad, integrated solutions
4. Fulfill the INS mission: to uphold the immigration laws	●	◑	• The functional model enables efficient delivery of shared services to the organization, providing local operating units are empowered enough to remove administrative roadblocks on low-risk activities

● <i>Best Fit With Imperatives</i>	◑ <i>Above Average Fit</i>	◐ <i>Average Fit</i>	◒ <i>Below Average Fit</i>	○ <i>Worst Fit With Imperatives</i>
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## **V. INTEGRATIVE MECHANISMS**

Integrative Mechanisms...

## **INTERVIEWS IDENTIFIED THE NEED FOR INTEGRATIVE MECHANISMS TO LINK SERVICE AND ENFORCEMENT OPERATIONS FOR EFFECTIVE EXECUTION AGAINST THE MISSION**

- Integrative mechanisms are ways in which different parts of the organization are brought together for a common purpose, e.g., sharing detailed information on a regular basis
- Interviews with field offices and headquarters indicated the need for at least 5 integrative mechanisms if service and enforcement operations were to reside in different units
  - Consistent interpretation of laws and development of regulations
  - Information sharing—equal access to information (e.g., A-files, investigations cases, etc.)
  - Closed-loop process of managing referrals from service to enforcement
    - Coordination between interviewing and detention capabilities
    - Fraud detection in the 4 remote service centers
  - Cross-functional training/continuing education
- Additional analysis would be performed in Phase II to create an exhaustive list of integrative mechanisms required to support the new organization

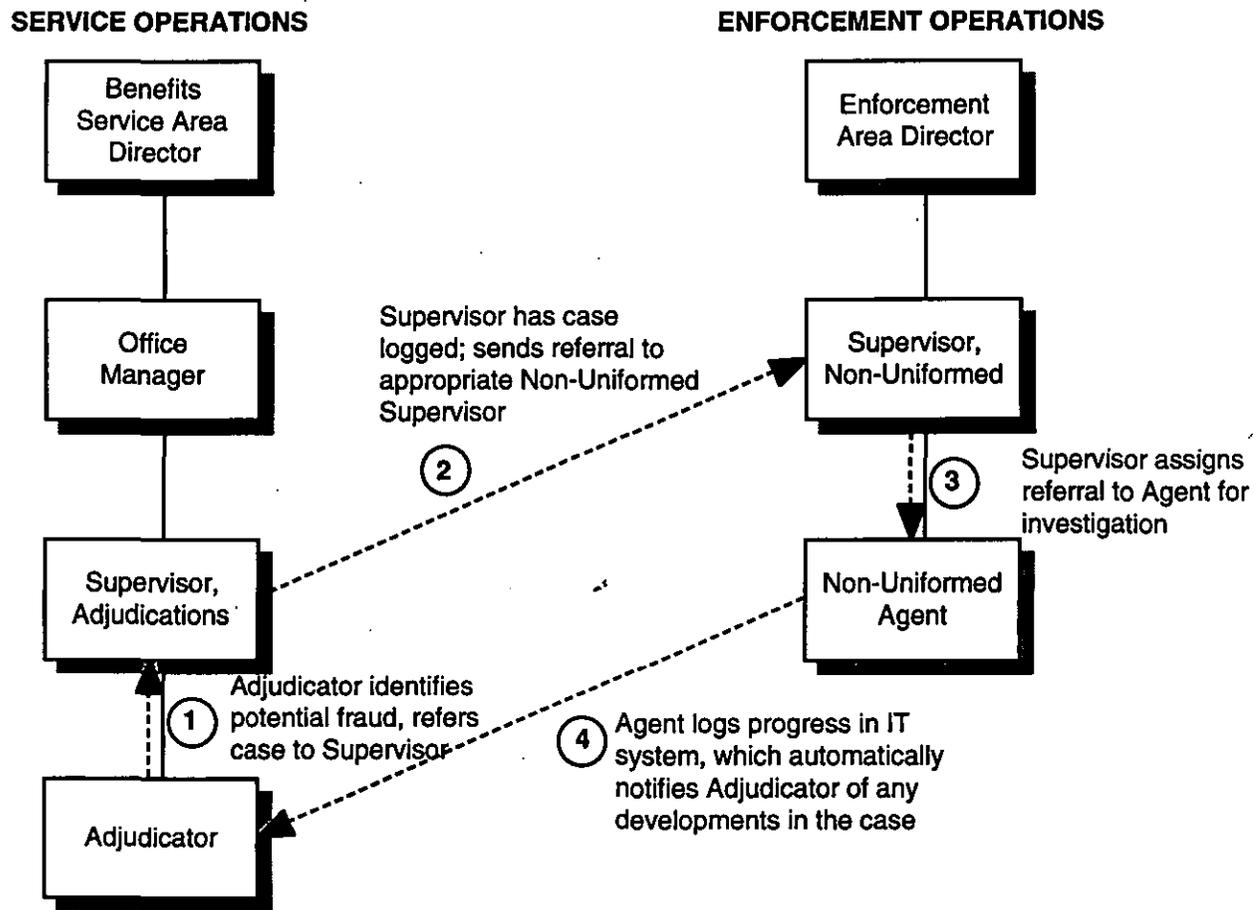
Integrative Mechanisms...

**WHILE DETAILING HOW THESE INTEGRATIVE MECHANISMS WILL TAKE PLACE IS A PHASE II ACTIVITY, AN INITIAL LOOK SUGGESTS THAT SOLUTIONS MAY BE FOUND WITH SOME COMBINATION OF BOTH PROCESS AND TECHNOLOGY**

INTEGRATIVE MECHANISM	PEOPLE SOLUTION	PROCESS SOLUTION	TECHNOLOGY SOLUTION
<ul style="list-style-type: none"> <li>• Consistent interpretation of laws and development of regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Single organization unit with responsibility interpreting laws within one agency, INS</li> </ul>		
<ul style="list-style-type: none"> <li>• Information sharing—equal access to information</li> </ul>	<ul style="list-style-type: none"> <li>• Data Steward role responsible for data integrity</li> </ul>	<ul style="list-style-type: none"> <li>• Process for determining data requirements INS-wide</li> <li>• Process for tracking, distributing, retrieving and updating hardcopy files</li> </ul>	<ul style="list-style-type: none"> <li>• System that provides equal access to service and enforcement files, accessible by service and enforcement personnel</li> </ul>
<ul style="list-style-type: none"> <li>• Closed-loop process of managing referrals from service to enforcement</li> </ul>		<ul style="list-style-type: none"> <li>• Criteria for when hand-off should occur and actions to be taken</li> <li>• Process for tracking hand-offs, progress, and resolution—visible to both service and enforcement</li> </ul>	<ul style="list-style-type: none"> <li>• Tickler system that advises service personnel of activity in a case handed to enforcement</li> </ul>
<ul style="list-style-type: none"> <li>• Cross-functional training/continuing education</li> </ul>	<ul style="list-style-type: none"> <li>• Personnel responsible for curriculum development in single unit</li> </ul>	<ul style="list-style-type: none"> <li>• Process for curriculum revision (e.g., frequency for updates, soliciting field input, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Multiple delivery mechanisms appropriate to material—e.g., small, frequent updates via email</li> </ul>

**FOR EXAMPLE, THE CLOSED LOOP REFERRAL PROCESS TIES SERVICE TO ENFORCEMENT**

**INTEGRATIVE MECHANISM EXAMPLE:  
Closed-Loop Referral Process**



**DETAILED ANALYSIS OF INTEGRATED MECHANISMS WOULD BE INCLUDED IN PHASE II**

Integrative Mechanisms...

## **WORK IN PROGRESS--KEY POINT FOR FEEDBACK**

- Is there a need in this document to discuss why splitting INS up and placing responsibilities elsewhere could be problematic?
  
- Examples...
  - Would create additional points of coordination in an organization that is already fragmented
  - Unclear that moving these activities to DOS and Labor would be a good fit with their missions or that they would be better able to absorb them
  - Would spend two years breaking it up and then need to focus on major transformation (i.e. would delay improvement 2 years)

**VI. EVALUATION OF NEW ORGANIZATION  
STRUCTURE**

Evaluation...

**THIS NEW ORGANIZATION LOOKS DRAMATICALLY DIFFERENT, IN PARTICULAR AT THE LOCAL LEVEL (NEW GRAPHIC BEING CREATED--ADD POINT ABOUT SMALLER HQ, PUSH DOWN DECISION MAKING)**

**TRANSFORMATION TO A NEW OPERATING MODEL**

<b>CURRENT ORGANIZATION</b>
<p><b>Characteristics</b></p> <ul style="list-style-type: none"><li>• Multiple axes of organization—strong geographic focus; service and enforcement operations combined</li><li>• Disconnect between responsibility and authority</li><li>• No clear and consistent model for activity placement—duplication of effort</li><li>• Vastly different spans of control</li><li>• Similar footprint for district service and interior enforcement activities with a district structure</li><li>• No clear career progression</li><li>• Integrative mechanisms ad hoc</li></ul>



<b>RECOMMENDED FUTURE STRUCTURE</b>
<p><b>Characteristics</b></p> <ul style="list-style-type: none"><li>• Clear primary axis of organization based upon mission—separation of service and enforcement operations</li><li>• Decision making pushed down to lowest appropriate level—responsibilities and authorities aligned</li><li>• Activity placement rationalized and integrated</li><li>• Consistent management spans—unnecessary layers eliminated</li><li>• New geographic boundaries drawn—service and enforcement likely to have different footprints</li><li>• Logical career progression model—reduced levels of attrition</li><li>• Institutionalized integrative mechanism</li></ul>

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Evaluation...

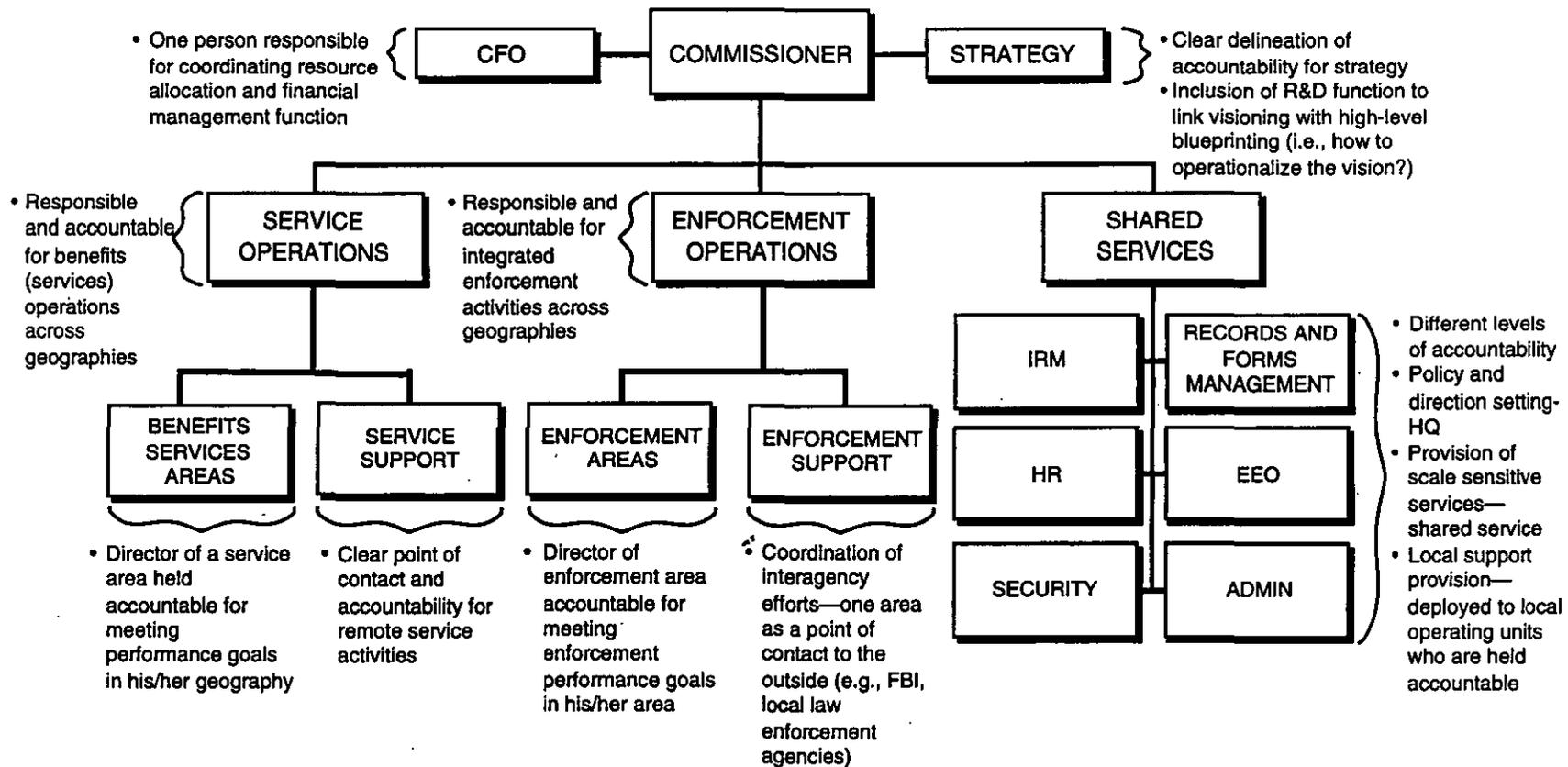
**THE NEW STRUCTURE ADDRESSES THE FOUR ORGANIZATION IMPERATIVES DERIVED FROM AN UNDERSTANDING OF THE INTERNAL AND EXTERNAL CONSIDERATIONS**

<b>ORGANIZATIONAL IMPERATIVES</b>
1. Develop clear lines of accountability
2. Create customer-oriented service capabilities
3. Build professional capabilities in law enforcement and services
4. Fulfill singular INS mission: to uphold the immigration laws of United States as intended by Congress

Evaluation...

# PAGES THAT FOLLOW ARE BEING DEVELOPED--ACCOUNTABILITY PAGE--WHY NEW ORGANIZATION IMPROVES IT

## HIGH-LEVEL ORGANIZATION DESIGN TO IMPROVE ACCOUNTABILITY



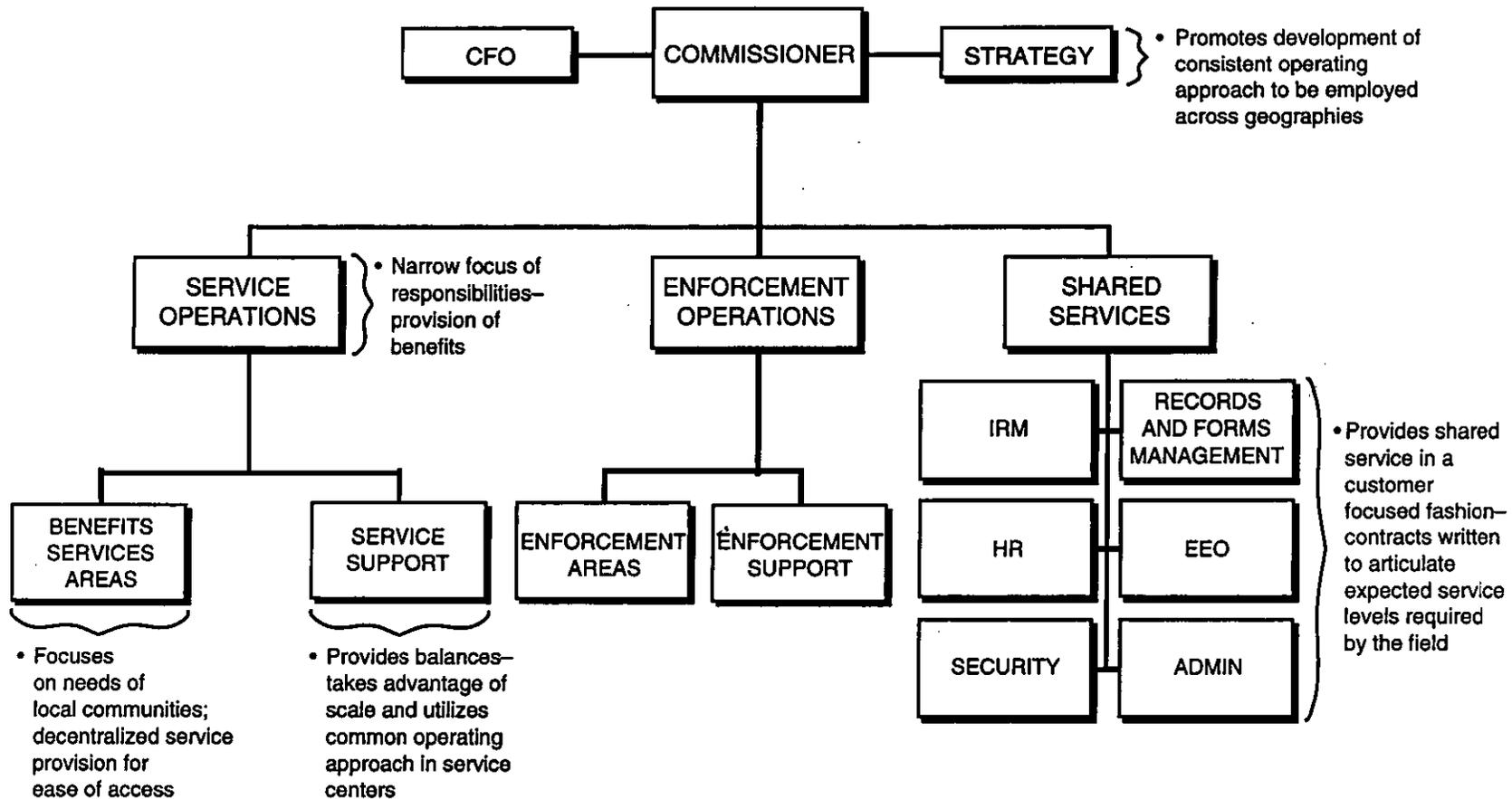
Note: Does not include General Counsel, Congressional Relations, Internal Audit or Public Relations

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Evaluation...

## CUSTOMER-ORIENTED SERVICE CAPABILITY--WHY BETTER IN THE NEW STRUCTURE

### HIGH-LEVEL ORGANIZATION DESIGN--CUSTOMER ORIENTED SERVICE CAPABILITIES



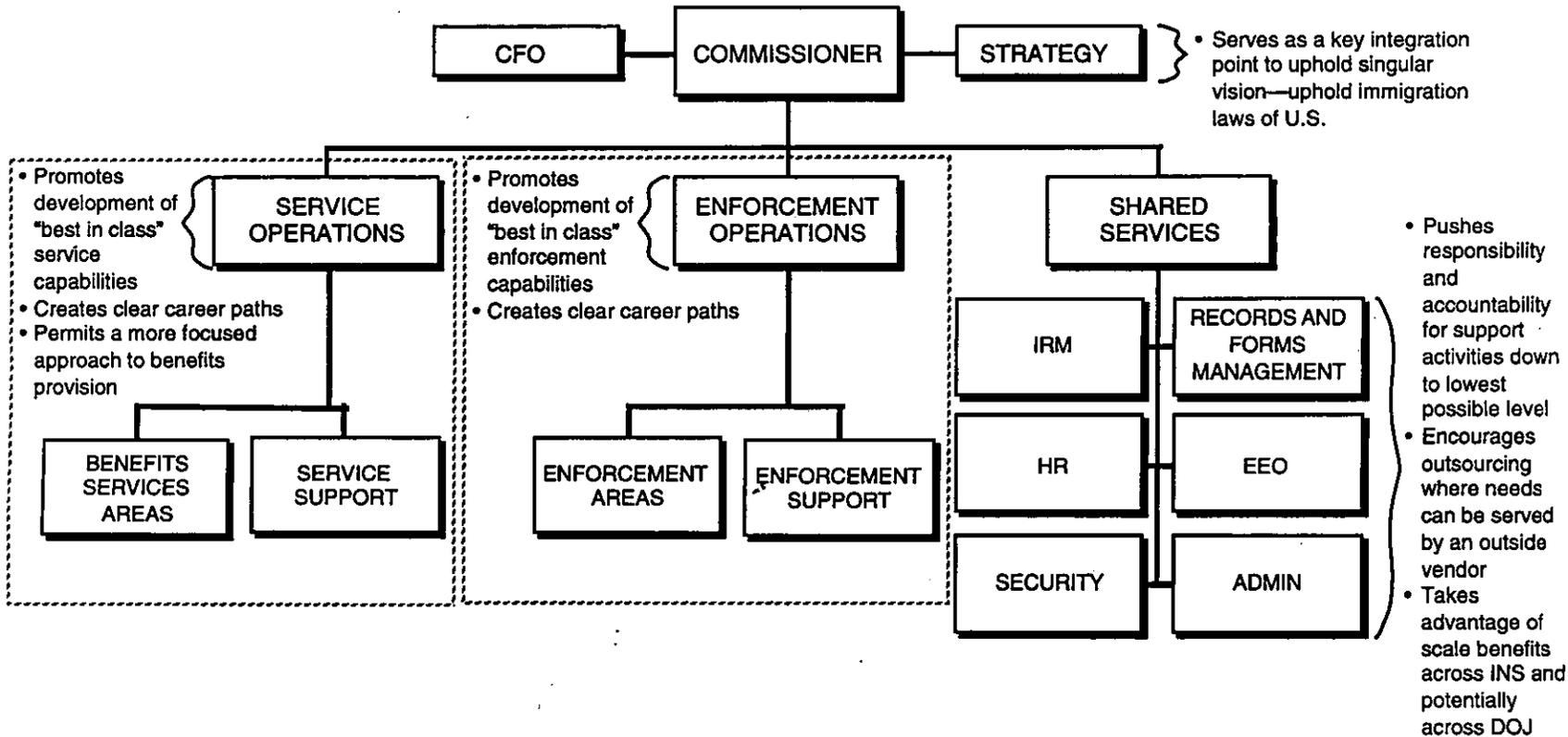
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Evaluation...

# PROFESSIONAL CAPABILITIES IN ENFORCEMENT AND SERVICE--IMPROVEMENT THROUGH STRUCTURE

## HIGH-LEVEL ORGANIZATION DESIGN – ENABLES DEVELOPMENT OF PROFESSIONAL CAPABILITIES IN BOTH SERVICE AND ENFORCEMENT



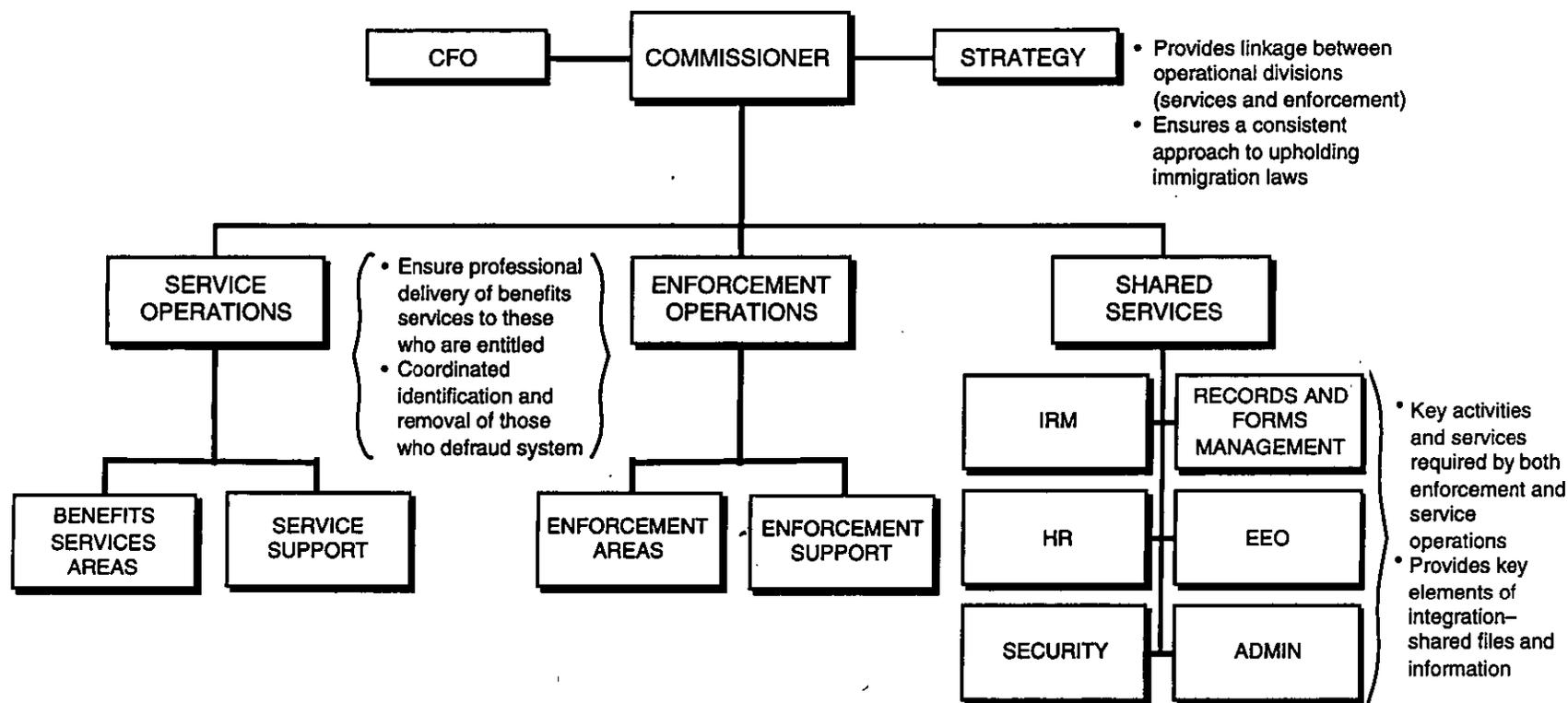
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Evaluation...

## FULFILL INS SINGULAR MISSION—UPHOLDING THE IMMIGRATION LAWS OF THE U.S.--WHY BETTER IN THE NEW ORGANIZATION

### HIGH-LEVEL ORGANIZATION DESIGN—FULFILL SINGULAR INS MISSION



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Evaluation...

## **CONCLUSION--WORK IN PROGRESS**

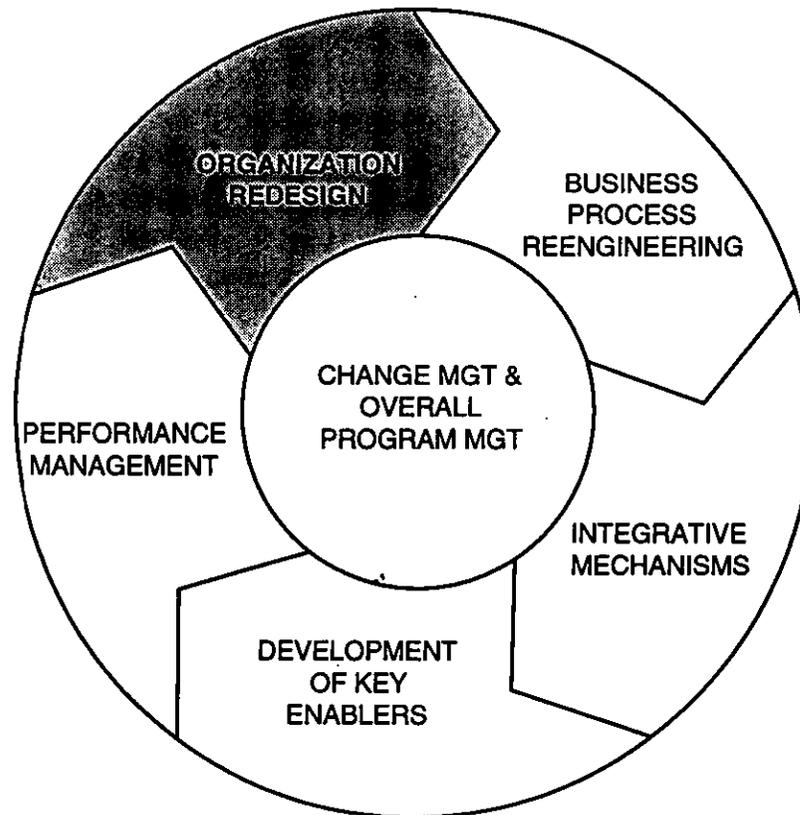
- Need some discussion of why not separate...
- Some talk @ other options, perhaps indirectly

## **VII. NEXT STEPS**

Next Steps...

**ORGANIZATION DESIGN IS ONLY ONE ELEMENT OF A BROADER TRANSFORMATION EFFORT**

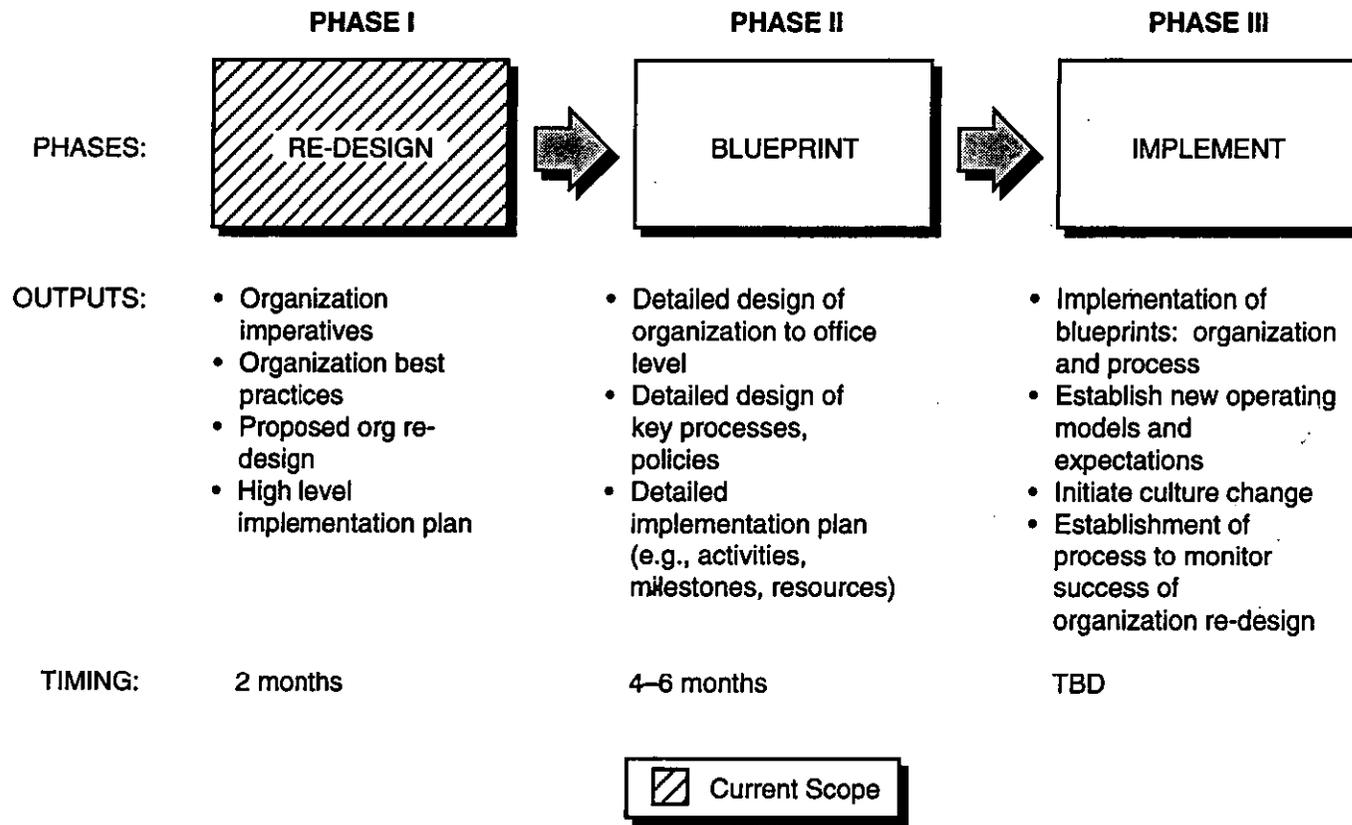
**ORGANIZATION TRANSFORMATION:  
KEY COMPONENTS**



Next Steps...

**TO CONTINUE TO DRIVE THE ORGANIZATION RESTRUCTURING TO THE NEXT LEVEL,  
FURTHER ANALYSIS AND IMPLEMENTATION IS REQUIRED (NEED TO CREATE TIMELINE)**

**ORGANIZATION RE-DESIGN AND IMPLEMENTATION**



**HIGH-LEVEL DESIGN IS THE FIRST PHASE OF A LARGER, 3-PHASE PROCESS**