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United States Department of State  
and the Broadcasting Board of Governors  
Office of Inspector General

# Management Review of Visa and Passport Fraud Prevention Programs

Report Number ISP-CA-05-52, November 2004

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# TABLE OF CONTENTS

PURPOSE AND METHODOLOGY.....	1
OVERVIEW .....	5
BACKGROUND .....	9
FINDINGS AND RECOMMENDATIONS .....	11
Fraud Prevention Policy .....	11
Overseas Fraud Prevention Programs .....	15
Bureau of Diplomatic Security/ Assistant Regional Security Officer-Investigator Management .....	25
Bureau of Consular Affairs/Fraud Prevention Programs Management ..	26
Resource Tools .....	35
Liaison With Other Agencies.....	40
CONCLUSIONS .....	47
FORMAL RECOMMENDATIONS .....	49
INFORMAL RECOMMENDATIONS .....	53
ABBREVIATIONS .....	55

## PURPOSE AND METHODOLOGY

### PURPOSE

The Office of Inspector General (OIG) is conducting a series of program reviews of consular functions. This report is a review of the management of the Bureau of Consular Affairs (CA) and Bureau of Diplomatic Security (DS) consular fraud prevention programs. OIG's examination of DS operations focused on their special investigators' assistance to consular sections abroad. Additional objectives were to determine whether CA is maintaining adequate oversight of the fraud prevention function; to assess the degree of cooperation and working relationship between the two bureaus and with other relevant organizations; to evaluate the antifraud programs at U.S. embassies and consulates in high-fraud countries; and to determine the effectiveness of headquarters support for this vitally important border security function.

OIG initiated this review as part of its overall evaluation of rapidly changing consular processes following September 11, 2001, which are designed to respond to greater emphasis on border control in support of the new U.S. national security mandate.

## METHODOLOGY

The inspection took place in Washington, DC, between October 2003 and August 2004. More than 250 U.S. government employees were interviewed in the Department and at the various posts and sites listed below:<sup>1</sup>

Abidjan	Islamabad	Rio de Janeiro
Abuja	Jerusalem	Tegucigalpa
Addis Ababa	Kingston	Tel Aviv
Amman	Lagos	
Bogota	Lima	<u>Airports</u>
Bangkok	London	
Cairo	Managua	Bangkok
Ciudad Juarez	Manila	Houston
Guatemala	Mumbai	Miami
Ho Chi Minh City	New Delhi	

OIG also visited the following Department of Homeland Security offices:

- El Paso Intelligence Center
- Texas Service Center
- Forensic Documents Laboratory
- Fraud Detection and National Security Organization
- Citizenship and Immigration Services, Office of Foreign Operations
- Citizenship and Immigration Services, Visa Security Unit

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<sup>1</sup> At each mission inspectors interviewed available consular section chiefs, fraud prevention managers, visa and passport unit chiefs, regional security officers, assistant regional security officer investigators, and Foreign Service nationals engaged in fraud prevention, as well as heads of law enforcement and intelligence agencies.

As part of the inspection, OIG also analyzed responses to a series of questionnaires covering numerous aspects of fraud detection and prevention sent to more than 80 visa-issuing missions abroad. Norbert Krieg (team leader), Charles Anderson, Robert Mustain, and Marlene Schwartz conducted the inspection.

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## OVERVIEW

The commission investigating the September 11, 2001, hijacking attacks concluded, “For terrorists, travel documents are as important as weapons,” and, “Targeting travel is at least as powerful a weapon against terrorists as targeting their money.” The commission concluded that travel is a danger for terrorists because they must present themselves to government officials.<sup>2</sup> Secretary Powell has stated that the Department of State’s (Department) visa and passport adjudicators are our first line of defense against terrorists, drug and people traffickers, criminals, and other ineligible aliens. Each of those adjudicators is a fraud officer who needs all the support that the Department can provide to make sound decisions. Critical tools that should be at their disposal are actionable intelligence, including the lookout system and fraud information regarding their applicants, plus effective training, especially post-specific training. A core fraud prevention responsibility is to provide such support, including identifying counterfeited travel documents, in a timely manner. Adequate resources and management support are essential. Absent effective support, adjudicators are liable to make uninformed decisions, thus enabling ineligible aliens, including potential terrorists, to gain admission to the United States.

DS and CA have worked together to detect and combat visa fraud and other criminal activities that threaten the integrity of U.S. visas and passports. Visa and passport fraud are serious crimes. CA and DS deserve significant credit for beginning the fraud prevention program with their memorandum of understanding (MOU) signed on July 30, 1996, long before the events of September 11, 2001, and subsequently expanding that program as border security took on new importance. A significant effort to combat consular fraud has been the creation of dedicated investigator positions overseas. Where these investigative positions are in place, the incumbents fully trained and adequately supported by both missions and Washington, they have shown clear, positive results in detecting and deterring fraud in both visa and passport functions.

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<sup>2</sup>The 9/11 Commission Report, July 22, 2004, page 384. The commission documented how al Qaeda set up a passport-making operation that altered travel and identity papers. Al Qaeda recycled dead members’ documents, and trained in lifting and replacing photos and altering border stamps. They also learned and exploited the anomalies in the immigration rules of many nations, including those of the United States.



Analysis and dissemination of fraud reporting based on information from the field also needs to be reinstated in CA/FPP. OIG considers that CA/FPP would benefit from organizational realignment.

At every post OIG visited, the personnel actively involved in fraud prevention attributed their success to fruitful interpersonal relationships with host country law enforcement officials coupled with strong post management support. Because

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## BACKGROUND

Fraud is a serious problem that threatens the integrity of the Department's immigrant visa, nonimmigrant visa, and passport processes. Fraud involves attempts by applicants to obtain travel documents through illegal means (e.g., misrepresenting their intentions to an adjudicating officer or presenting counterfeit identity papers).<sup>3</sup>

They also believe that some aliens are fraudulently using the visa and passport application processes to enable them to carry out illegal activities, including crimes of violence, narcotics trafficking, and terrorism. The 9/11 Commission stated that al Qaeda "would add or erase entry and exit stamps to create 'false trails' in terrorists' passports."<sup>4</sup> The commission reported that a consistent terrorist strategy is using fraudulent passports, visas, and deceit in applying for travel documents.<sup>5</sup>

As described below, the Department has taken many commendable steps to render the visa and passport processes less vulnerable today than they were before September 11, 2001. The first terrorist attacks on the World Trade Center on February 26, 1993, caused a number of changes in many consular processes. Included in the measures taken to counter these fraudulent activities, CA and DS entered into an MOU in July of 1996 establishing a pilot project to conduct consular fraud investigations. Under the MOU, DS agents were assigned to consular sections at selected embassies and consulates to provide enhanced support to antifraud efforts in the visa and passport issuance processes.

Originally three posts were selected. In 2002, DS established 18 additional positions with post-September 11, 2001, security-related Congressional funding. Currently 25 assistant regional security officer-investigators (ARSO-I) positions exist; by November 2004, 19 of those positions will be encumbered while six officers are undertaking language and other training.

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<sup>3</sup> Consular officers generally define fraud as "Knowingly altering or using counterfeit documents or intentionally making false claims or statements to obtain a U.S. visa or passport." DS officers use the definition in 18 USC 1546.

<sup>4</sup> The 9/11 Commission Report, page 235.

<sup>5</sup> The 9/11 Commission Report, "A Case Study in Terrorist Travel," pages 177, 178.

During the course of the inspection, a new MOU was signed.<sup>6</sup> It incorporates the improvements and adjustments made to the program since the pilot project began. For this review, OIG looked at performance in the field under the previous agreements. OIG also reviewed the new draft and found that it addresses and resolves many of the issues identified during OIG field visits.

CA/FPP was created in June 1986 to combat fraud in the visa and passport issuance processes. Its stated areas of focus include building consular adjudicator and passport examiner antifraud skills, identifying fraud prevention technologies and best practices, assessing vulnerabilities to malfeasance, analyzing and sharing information to improve decisionmaking, and fostering liaison with other government agencies. Just prior to the terrorist attacks in September 2001, the office had a vacancy rate of over 50 percent, and the general understanding was that CA/FPP would be abolished. New leadership in CA has resulted in major changes regarding the role of CA/FPP, including filling the office's numerous vacancies and reorganizing its functions.

The goal of providing visa and passport services in a timely manner to those who are legally entitled to them should be consistent with the goal of preserving the integrity of the system by denying benefits to those who are not eligible. New procedural and administrative requirements necessitated by border security demands have also placed additional burdens on the adjudication process. More adjudicator resources are needed to permit a better balance between timely adjudication of visa and passport application needs and the need to detect and possibly investigate fraudulent applications.<sup>7</sup>

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<sup>6</sup> State 194569, September 10, 2004, Subject: Memorandum of Understanding Between CA and DS.

<sup>7</sup> The 9/11 Commission reports that two systemic weaknesses led to the terrorist hijackings: "A lack of well-developed counterterrorism measures as a part of border security and an immigration system not able to deliver on its basic commitments, much less support counterterrorism. These weaknesses have been reduced but are far from being overcome." The 9/11 Commission Report, page 385.

## FINDINGS AND RECOMMENDATIONS

### FRAUD PREVENTION POLICY

Prior to the terrorist attacks of September 11, 2001, Department attitudes saw consular fraud, particularly visa fraud, primarily as an attempt to evade the visa law and obtain entry into the United States *to work in and be part of this society*. In this light, and with the emphasis on customer service and dealing with workload volume, all but the most serious or compelling cases of fraud tended to be treated lightly. Relatively few resources were devoted to antifraud efforts. The first serious countermeasures were established as a response to organized crime in the early 1990's. CA/FPP performed excellent work in assisting posts in the new independent states countries to counter the attempts of the Russian mafia to obtain visas fraudulently.

The full realization that consular fraud is also a matter affecting national security came after September 11, 2001. A few visa or passport applicants may now intend *to destroy this society*. The post-September 11, 2001, environment now demands a much more labor intense, systematic, and thoroughly professional approach to fraud prevention. This period has experienced a significant increase in law enforcement and intelligence agencies' sharing information with consular officers. The Consular Lookout and Support System (CLASS) database available to visa and passport adjudicators has more than doubled in size since September 11, 2001. Visa officers are getting more actionable intelligence about their applicants and are more readily detecting ineligible persons because of the additional information now available to them.

During recent inspections, OIG recorded some of the major changes and innovations that CA has made toward reshaping the visa and passport processes to meet post-September 11, 2001, security requirements. A few of the changes that OIG noted include:

- CA instructed missions to strictly limit waivers of personal appearance requirements to include only very limited categories of applicants such as diplomats, young children, and elderly persons. This resulted in interviews of up to 90 percent of all visa applicants.

- CA mandated that visa applications be fully and thoroughly completed.
- CA improved visa interview requirements for nationals of certain demographic groups of visa applicants from certain countries. These applicants are also screened by U.S. intelligence and law enforcement agencies before any visa is issued.
- In coordination with CA, the Foreign Service Institute (FSI) is providing more training of consular officers in a wider variety of interview techniques and has established a course in name-checking, so that consular officers can better identify and deal with applicants found in the CLASS database.
- CA expanded access to the Passport Information Electronic Record System for better screening of passport applicants.
- Visa adjudicators are now fingerprinting visa applicants for comparison with information available in the IDENT database, which results in the identification of those with previous criminal records. Biometric identification has been implemented in compliance with a Congressional mandate. In addition, as part of the United States Visitors and Immigrant Status Indicator Technology program, Department of Homeland Security (DHS) officers at ports of entry have been given electronic access to visa applications, which facilitates more effective inspection procedures.
- In August 2003, CA established a fraud prevention unit at the National Visa Center in New Hampshire that focuses on data validation and fraud screening using automated search tools.
- CA also established the automated Passport Lookout Tracking System database of all passport fraud cases, which is now available to all passport agencies.

Senior management can do more to emphasize the importance of fraud prevention efforts and to provide needed resources and support. OIG observed during visits to the field and from responses to questionnaires that too many adjudicators remain overworked and lack the time to absorb fraud prevention intelligence.<sup>8</sup> Although the importance of the consular function, and particularly the visa process, has received noticeably greater emphasis in the ambassadorial and

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<sup>8</sup>OIG sent questionnaires to consular section chiefs, fraud prevention managers, regional security officers, and investigators at over 80 posts, covering both high fraud and purportedly low fraud posts. Analyses of their responses are covered in this report.

deputy chief of mission training courses, and the Secretary of State has communicated his personal support of consular work, the message still has not fully taken hold. Many ambassadors still routinely draw officers from consular sections to staff their front offices, and rotational officers are curtailed in their consular rotations in order to move to other sections.

The Office of Management and Budget and the Congress are beginning to realize that effective consular work to protect our border security requires commensurate resources. CA senior management has recently begun to use its influence to attract better candidates to CA/FPP and has now given the office's efforts more support and visibility.<sup>9</sup> The Department has attempted to respond to criticism of delays in visa processing while simultaneously carrying out its responsibilities to enhance border security. Both endeavors require making a stronger case for adequate staff levels and facilities, better training, and experienced consular leadership in the field.

The CA-DS fraud prevention program has great potential in meeting the nation's new security needs. The MOU provides the structure on which to build a strong antifraud effort to help meet the Department's border security goals. Ultimate success, however, requires major changes in the way the Department, not just CA and DS, views consular fraud.

Under the Immigration and Nationality Act, consular officers adjudicating nonimmigrant visa applications have the authority to refuse such cases under section 214(b) if they suspect that the applicant is perpetrating fraud.<sup>10</sup> Visa officers at posts with heavy visa workloads have informed OIG that they are sometimes reluctant to burden their fraud prevention units (FPU) with such cases when it is easier and simpler to refuse an applicant suspected of committing fraud under 214(b). The downside of such actions, however, is that 214(b) decisions involving fraud remain individual adjudications filed away with little further analysis. They are not considered in context with other, similar fraud related cases.

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<sup>9</sup> State 219643 of October 12, 2004, concerning assignment opportunities in CA/FPP.

<sup>10</sup> Section 214(b) of the Immigration and Nationality Act (8 U.S.C. 1184) states that "Every alien ... shall be presumed to be an immigrant until he establishes to the satisfaction of the consular officer, at the time of application for a visa ... that he is entitled to a nonimmigrant status ..."



but only for the particular year he or she was caught.

OIG documented such fraud in a previous report and recommended that CA should propose legal changes that would permanently bar from future diversity lottery programs all adult applicants who are identified as multiple applicants. CA responded that the proposed changes would be unlikely to garner significant Congressional support and the recommendation was not implemented.<sup>13</sup> On April 29, 2004, the Department's Deputy Inspector General testified before the House Judiciary Subcommittee on Immigration, Border Security, and Claims concerning the DV program. She spelled out numerous examples of fraud that had been identified during ongoing OIG work on the program, adding that OIG would determine whether these vulnerabilities have been fully addressed. "OIG plans to reexamine its previous findings," she said, "and will continue to recommend ways to strengthen these programs." The Department has an obligation to bring matters affecting our border security to the attention of Congress. OIG believes that implementing the following recommendation would be a step to discourage fraud in that program.

**Recommendation 1:** The Bureau of Consular Affairs should recommend that Congress amend the Immigration and Nationality Act to render aliens found to have intentionally committed fraud under the diversity visa program permanently ineligible to obtain U.S. visas in any category. (Action: CA, in coordination with H)

## OVERSEAS FRAUD PREVENTION PROGRAMS

### General

Fraud prevention programs in consular sections abroad range from serious, well-staffed efforts to little more than nominal commitments. Post leadership all too often neglects this function, and additional guidance from CA is needed as to

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<sup>13</sup> Diversity Visa Program, OIG Memorandum Report, ISP-CA-03-52, September 2003, Recommendation 2. This recommendation has now been transferred from the original report and reissued here.

where and how fraud efforts should be increased or sharpened. OIG noted a need for closer hands-on direction and oversight of fraud prevention work in the field. Bureaus have devoted insufficient resources to meet necessary staffing and support requirements.

Pertinent and timely intelligence is crucial to adjudicators, who need to decide visa and first time passport applications quickly. CA/FPP needs to take more proactive measures to support fraud detection and prevention efforts. Many FPMs and ARSO-I in the field reported to OIG that they did not communicate with CA/FPP on a regular basis. OIG ascertained that a Middle Eastern post involved in an ongoing investigation of several cases of identity fraud, which were associated with serious criminal matters, failed to seek CA/FPP assistance. CA/FPP currently does not consider that supporting the casework of posts abroad comes under its mandate, and it is not organized to support the field in this function. An ongoing CA/FPP initiated exchange of information with posts needs to take place. OIG addressed this issue in Recommendations 9, 10 and 11 below.

OIG saw no uniformity of approach to staffing and found a mixed commitment to fraud detection and prevention. As a result, efforts range from high to low quality. The amount and quality of staff assigned to fraud directly correlates to the level of commitment. In some missions, OIG found that junior officers were heading FPUs only part-time and on a rotational basis. Although this approach gives many officers exposure to a variety of Foreign Service activities, it does not develop or take advantage of the in-depth knowledge and skills that come with experience or with more structured consular career development.

The Department's primary antifraud goal should be to focus on investigation and eventual prosecution of large-scale, complex fraud schemes perpetrated by facilitators, criminal or terrorist organizations; e.g., cases involving multiple persons and large sums of money, including activities carried out through international coordination. Department staff do not uniformly understand the respective investigative roles of consular FPMs and ARSO-Is. The FPMs are responsible for investigating fraud cases up to the point of criminality. Once a case is considered a criminal matter that could lead to legal prosecution, it becomes an issue for the

ARSO-I or regional security officer to pursue. During the inspection, CA began to provide better working-level guidance for its FPMs.<sup>14</sup> Absent further guidance and active follow-up, CA cannot ensure that its limited investigative resources have sufficient home office support and are focused on the highest priority cases.

**Recommendation 2:** The Bureau of Consular Affairs should provide continuing, detailed guidance to fraud prevention managers at posts abroad, to enable them to better prioritize and carry out their responsibilities. (Action: CA)

Better training and support results in better decisionmaking by adjudicators. This also leads to a better balance between refusals and issuances, or, as articulated by Secretary Powell, “secure borders - open doors.”<sup>15</sup> According to many experienced consular officers, the only real alternative to effective initial training is six months of on-the-job, on-the-line adjudication exposure. CA/FPP has a crucial, supporting role in assisting adjudicators to make better decisions by providing intelligence and training. FSI states that its basic consular training course given to all incoming consular officers is very general and designed for worldwide applicability. FSI expects that each post abroad will supplement this course with one or two weeks of post-specific training. Such an initial orientation program should focus on local customs and conditions, cover intelligence pertaining to visa and passport applicants, and highlight common fraud patterns encountered at the post. OIG observed, for example, that Embassy Mexico City had an excellent training program that could be used as an effective model elsewhere. OIG considers that the CA/FPP training unit, assisted by FSI, could adapt and disseminate such a fraud specific training program for worldwide use, and has made an appropriate informal recommendation addressing this issue.

All too often fraudulent documents are presented with visa applications. Officers at many posts believe that counterfeit documents of exceptional quality are produced in their countries. Consular officers at almost all posts reported to OIG that the large majority of the documents presented were unreliable, obliging them to depend almost exclusively on interviews. Therefore, staff assigned to the

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<sup>14</sup> See 03 State 340558 of December 12, 2003, Standard Operating Procedures 54: Fraud Prevention Management Checklist, which encourages posts to “draw on [these] guidelines to evaluate and improve their FPU’s.”

<sup>15</sup> Secretary of State Colin L. Powell, *State Magazine*, June 2004, page 2.

adjudication function need to have excellent interviewing skills. Unfortunately, most officers currently develop these skills only peripherally and through extensive practice. Some questionable cases may not be detected while officers struggle to gain experience.

CA has recently issued standard operating procedure (SOP) 73 (04 State 164399), which describes a model training and orientation program for newly arrived consular officers at all posts. OIG believes that this SOP and its predecessor (03 State 195552) go far in alleviating a troublesome weakness in the adjudication process. However, OIG encountered extensive circumvention of newcomer training at a number of posts. Management at those posts cited the lack of personnel resources and large workload demands as reasons for neglecting initial officer training. During the course of the inspection, CA implemented a mandatory requirement that consular section chiefs must certify, as part of the new annual certification of consular management controls, that all consular officers have completed newcomer training, including awareness of fraud in applications for visas and other benefits.<sup>16</sup>

There is insufficient communication or interaction between ARSO-Is, FPMs, and FSN-investigators (FSN-I) either regionally or globally, although individuals in each category report how useful such personal contacts are in pursuing their work. The FSN-I at a Central American post noted how valuable the FSN-I in an East Asian post had been in translating some Chinese documents in a case he was developing. The two had met during an FSN fraud prevention course at FSI. The FPM at a South American post regularly requested document verification assistance from a colleague at a domestic passport agency. Some DS agents also reported calling colleagues in domestic offices for help on cases. Such interaction needs to be better coordinated and facilitated by the Department. Fraud prevention conferences, both regional and thematic, need to be regularly scheduled and held. Large individual missions like Brazil, Mexico, India, and China held fraud conferences during the past year. Some of the conferences are post-funded, and therefore there is no assurance that they will continue on a regularly scheduled basis. Both CA and the regional bureaus need to request appropriate funding for and regularly schedule mission, regional, and/or thematic fraud prevention conferences, and these requests should also be included in Mission Performance Plan and Bureau

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<sup>16</sup> State 201680 dated September 17, 2004, which also cites the two training cables mentioned above.

Performance Plan submissions. CA appreciates the utility of such conferences and previously has often obtained the necessary funding. Additional presentations of the one-week Fraud Prevention Course for Consular Managers (PC-541), now held twice a year at FSI, also needs consideration as does adding an effective fraud prevention module to regular regional consular conferences. The PC-541 course would also benefit from including a short section on the role of ARSO-Is for participants.

**Recommendation 3:** The Bureau of Consular Affairs, in coordination with the regional bureaus, should budget for, schedule, and hold regular regional fraud prevention conferences to encourage the exchange of intelligence and cooperation in the field. (Action: CA)

The space allotted to anti-fraud operations at most of the posts visited by OIG generally reflected the importance assigned to anti-fraud efforts. Few designated FPMs in the field had their own, separate office space. This was especially true at posts where the FPM designation is given to a junior officer who may not even have separate desk space. There was seldom room at many posts to set up equipment or to store antifraud materials such as ultraviolet lights, microscopes, exemplars and files. Few sections had provision for storing classified antifraud materials or files to facilitate their use quickly and without attracting undue attention.

A few posts, notably Kingston, Cairo, London, and Ciudad Juarez, proved the exception where the Fraud Prevention Manager and/or FSN-I had separate, dedicated office space in which interviews could be conducted and equipment and files kept. These space limitations clearly impacted on the conduct of fraud prevention operations. Units which had space functioned more effectively and comprehensively than did those which did not.

**Recommendation 4:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Consular Affairs, should require overseas posts to provide fraud prevention managers with designated office space suitable for using and storing antifraud documents and equipment. (Action: OBO, in coordination with CA)



essential to border security. At many posts junior officers rotate into the designated FPM positions without the training, skills, or experience to perform effectively. They find little at post in the way of written guidance to assist them. During the inspection CA distributed SOP 54 (03 State 340558, December 12, 2003), which provides FPMs with a checklist stressing the need for such training and instructs posts to “evaluate and improve their FPU.” The bureau still needs to publicize these training requirements more broadly and vigorously encourage compliance. OIG also noted that fraud profiles and related materials at many posts visited were outdated or inadequate. FSI and CA/FPP offer a training course several times a year, but not frequently enough to reach all fraud officers, particularly when the function is assigned on a rotational basis. These officers often rotate soon after receiving the training, and the benefit to the post is then lost.

**Recommendation 5:** The Bureau of Consular Affairs should require all posts to develop post-specific fraud-related training modules for all consular positions, including fraud profiles and material appropriate to line adjudicators, fraud prevention managers, and Foreign Service national investigators. (Action: CA)

While CA/FPP has a list of “high fraud” posts, OIG found no written criteria for establishing FPM positions overseas. All the posts visited by OIG for this report had designated a FPM as required, but only a few had a full time, dedicated FPM position. Several “high fraud” posts have no full-time FPM or ARSO-I, and some lack even a dedicated FSN-I. Others, such as Abidjan and Lima, have a dedicated ARSO-I, but no full-time FPM. Some consular officers opined that each post with an ARSO-I position should also have a full-time FPM position. Many part-time FPMs are junior officers who lack experience and simultaneously head another consular unit. Such FPMs believe that they are not fulfilling the requirements of both full-time positions. OIG also found that some posts have underutilized staff. OIG encountered three regional FPMs at Mexico City, Rio de Janeiro, and Chennai who are charged with regional responsibilities, but they are actually limited to countrywide coverage. Furthermore, they have very limited travel funds at their disposal. The officer at Mexico City was able to visit only one of nine constituent posts in Mexico and only once during the 12-month period preceding the inspection. OIG considers the regional/countrywide FPM an excellent idea worthy of further development and adequate funding. In the inspection

of Embassy Bangkok, OIG recommended the designation of the FPM in Embassy Bangkok as the regional fraud prevention manager for Thailand, Burma, Laos, and Cambodia.<sup>18</sup> Although DS has included very good criteria for establishing future dedicated ARSO-I positions in the new MOU, CA has not established formal criteria for either FPM or regional FPM positions.

A related problem noted by OIG is the inconsistency of the assignment of FSN investigators. In Kingston, the FPM had two FSN investigator positions under his management. The ARSO-I had no FSN support at all. In Tel Aviv the part time FPM had one position that was largely devoted to fraud prevention while the ARSO-I had three investigators that he could assign as he deemed appropriate. Similar mixed patterns were found at other posts visited by OIG.

**Recommendation 6:** The Bureau of Consular Affairs should review overseas staffing and prepare a plan to establish uniform criteria for creating fraud prevention manager positions overseas, and determine where full-time fraud prevention manager positions should be established. (Action: CA)

There are only a handful of consular positions designated as FPMs. No formal qualifications have been established for these positions, and few officers serve in more than one antifraud-related assignment. Many consular officers engaged in antifraud work informed OIG that they were very enthusiastic about their work and would gladly accept multiple assignments to fraud prevention jobs if this were feasible professionally. None of the officers interviewed regarded their FPM designation as promoting their careers. However, such assignments need to be viewed as career enhancing to attract skilled, effective and competitive officers.

**Recommendation 7:** The Bureau of Consular Affairs, in coordination with the Bureau of Diplomatic Security, should request the Bureau of Human Resources to develop and publish precepts directing the appropriate selection panels to accord special consideration for promotion to fraud prevention managers with excellent performance records. (Action: CA, in coordination with DS)

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<sup>18</sup> Inspection of Embassy Bangkok, Thailand, and Constituent Post, ISP-I-04-22A, May 2004, page 16.

At many posts the backbone of the fraud prevention program is the FSN-I. In posts such as London, Cairo, and Managua, FSN-Is bring special expertise and experience together with local knowledge and language skills that U.S.-hired employees cannot duplicate. Although basic job descriptions exist and there is a generic list of qualifications established for this position, OIG found little consistency in how these positions were filled. At some posts an FSN already on the staff is simply asked to serve in fraud prevention without any special qualifications or training. The positions are often underrated in comparison with highly skilled FSN positions in other sections of a mission. The Department is currently revising the FSN position system with a new program entitled computer assisted job evaluation (CAJE). This process offers a good opportunity to review the three FSN fraud investigator position descriptions with a view to creating a promotion ladder and appropriate position classifications. OIG made an informal recommendation addressing this issue.

Junior officers serving as visa adjudicators are often first- or second-tour officers in the one-year consular portion of a two-year rotational assignment. Frequently this is the first year of their first overseas Foreign Service experience. It takes several months to develop the interviewing skills necessary to effectively evaluate applicants, especially in high-fraud or high security-risk posts. The Basic Consular Course training is insufficient for these needs. Adding to the effort of learning basic consular skills, the officer must also learn how to get along in a post environment. As these lessons are learned and the officer becomes fully effective, it is already time for this officer to leave and begin the second half of the rotation. When key ancillary duties - including FPM responsibilities - are added to the junior officer's job description, it is often not possible to devote adequate time to learning, much less performing, these additional important fraud prevention duties. Finally, consular managers, who have limited tours themselves, are caught up in a never-ending training mode, always beginning anew with more officers to train and forced to make up for the inefficiencies created. This process can be detrimental to the management functions they should be performing. OIG raised this issue in a previous report.<sup>19</sup>

## Fraud Prevention Management Training at Posts

Post-specific training for consular fraud detection and prevention is not well defined. There are few structured on-the-job training plans for individuals assigned

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<sup>19</sup> Review of Nonimmigrant Visa Issuance Policy and Procedures, ISP-I-03-26, December 2002.

to fraud-related functions. The type and amount of training is usually dependent on the commitment of, and resources available to, the consular management team. OIG found widely varied approaches to fraud prevention training at the posts we visited; some were proactive, but most were reactive. Few posts prepared consular officers to detect any but the most obvious fraud attempts. (See also Recommendation 5).

OIG found that many ARSO-Is have been successful in detecting and investigating visa or passport fraud internal to the post, either perpetrated or facilitated by malfeasant employees. At one large consular post visited by OIG, it was found that the ARSO-I had recently completed three separate investigations that resulted in 11 FSNs being fired for cause. Few of these investigations are used as material for lessons-learned reports. Such reports would make excellent instructional guides for entry-level officers, particularly at small one-officer consular sections that often encounter sophisticated fraud schemes conducted by malfeasant employees. CA has, in fact, transmitted two useful cables on consular malfeasance to posts.<sup>20</sup> These have offered a good start and serve as vehicles to build on.

**Recommendation 8:** The Bureau of Diplomatic Security should develop more standardized training using reports of successful assistant regional security officer-investigator malfeasance investigations, redacted as needed, as lessons-learned training guides. (Action: DS)

While OIG found that fraud training for consular officers needs improvement, the DS officers assigned to consular fraud detection and prevention responsibilities are usually well trained. The difference is that there is a formal training plan incorporated in the MOU that must be completed by each agent prior to assignment. It includes language training, the security seminars, and the entire Basic Consular Course given by FSI resulting in each agent receiving a consular commission. At some posts, the agents' training is reinforced with periodic assignments "at the window" to interview visa applicants. This allows agents to keep their interviewing skills sharp and relate to the daily experience of line consular officers. Moreover, OIG found that the best performing DS personnel assigned to fraud prevention work at posts abroad had excellent prior investigative experience in law enforcement. OIG encourages DS to continue this recruiting and assignment strategy for the ARSO-I positions.

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<sup>20</sup> See 03 State 272523 of September 9, 2003, and 03 State 346750 of December 22, 2003.

BUREAU OF DIPLOMATIC SECURITY/  
ASSISTANT REGIONAL SECURITY OFFICER-INVESTIGATOR  
MANAGEMENT

DS has taken significant, commendable steps in addressing this specific program. The new MOU reflects the lessons learned from the first years of the program. It also addresses the anomalies created by having two separate bureau-initiated programs in the field and clarifies management questions to dispel confusion. It will open the door for stronger antifraud efforts at some of the most important visa posts overseas. It should be noted that the MOU covers the relationship between the two bureaus at posts abroad and not in Washington. During the inspection both bureaus made significant strides in effectively furthering their antifraud cooperative efforts in the Department as well.

In OIG's review of the fraud prevention programs overseas, the designated ARSO-I was most often located in the regional security office, often physically far removed from the consular section. At relatively few posts, e.g., Manila, Kingston, and Bogota, the ARSO-I had an office in the consular section. When the ARSO-I was not collocated, communication and cooperation, as well as integration of fraud prevention efforts, were more difficult. Where the ARSO-I is located in the section, the agent is consulted more often by the consular staff and is able to provide more training and guidance in spontaneous situations. These opportunities do not occur in a busy section when the ARSO-I is located at some distance. DS has requested collocated space wherever possible in the recent MOU. OIG supports this initiative.

OIG found few posts that provided the ARSO-I (or FPM) with a separate, private secure area or window from which to conduct interviews. Most often these interviews must be conducted at regular visa windows within view and hearing of other applicants in the waiting room. This is not helpful for interviewing confidential informants from either outside the mission or from the mission staff itself. ARSO-Is also benefit from being provided with appropriate space in or near the consular section where such space is available, or planned for, if it is not available. The revised MOU addresses this issue.

## BUREAU OF CONSULAR AFFAIRS/FRAUD PREVENTION PROGRAMS MANAGEMENT

### General

In past years, CA/FPP had been a neglected office, adversely affected by pervasive rumors of its pending demise. Prior to September 11, 2001, few resources were dedicated to consular fraud, and CA/FPP had a serious vacancy rate. New CA leadership has begun to reverse that course by insisting that the office fill all vacancies, and by creating, in cooperation with DS, a new vulnerability assessment unit and a unit assessing fraud trends within CA/FPP. After September 11, 2001, the function has come under very close public scrutiny with much attention given to minimizing vulnerabilities in the visa issuing process. CA is now committed to staffing this function fully and revitalizing its support of overseas fraud detection and prevention.

CA has now acknowledged the importance of fraud prevention by implementing new initiatives, including an excellent and useful new fraud prevention web site. CA/FPP has also inaugurated a new e-room to serve as a forum for exchanging fraud prevention information and document information. Fraud reporting cable traffic is placed in the e-room as well as reports from passport agencies, post newsletters, exemplars, and fraud-related reports from other sources. Some 200 users currently access the e-room.

Although significant progress has been made, further action still needs to be taken. Granted a new "lease on life," CA/FPP continues to struggle to carve out a meaningful role for itself within CA's broad mission to enhance border security. This is reflected in the difficulty in recruiting qualified staff, as well as a perceived lack of support from CA/FPP expressed to OIG by the field. The office currently has four units responsible for training, information gathering (intelligence would be a more accurate and better term) and analysis, and units devoted to assessing fraud trends and vulnerabilities. While CA/FPP does not have a unit responsible for its publications and web site, OIG agrees that it is not necessary to establish one.

Fraud prevention efforts currently tend to be reactive and not yet sufficiently coordinated. FPMs at the 23 posts and the passport agencies interviewed by OIG were unable to describe what CA/FPP does or how it supported their operations. As noted above, they reported little or no contact with CA/FPP on a regular basis

and little support for ongoing cases. ARSO-Is had almost no contact with FPP and reported working with DS instead. New CA/FPP staff members do not fully understand their position responsibilities, and the long-time staff perceives a demoralizing lack of commitment to combating fraud. Some CA/FPP employees told OIG that they had neither the skills nor the experience required for their positions.

Well qualified staffing is critical to CA/FPP's ability to create and fulfill a meaningful role in fraud prevention and border security. As a result of a widely held rumor that the office was to be abolished, both Civil Service and Foreign Service employees were reluctant to join its staff. CA management has recently begun to change this by signaling its desire to attract stronger candidates for CA/FPP position vacancies and attaching real importance to the work of the office.<sup>21</sup> CA/FPP's senior Civil Service position is particularly helpful in promoting better liaison with other agencies in which U.S. government employees remain in their positions for many years and value continuity. The incumbent could also screen all outgoing office correspondence and publications for consistency and conformity with CA policy.

CA/FPP is not appropriately configured to carry out its responsibilities effectively. The training unit is overstaffed, lacks the equipment necessary to produce and deliver up-to-date training modules, and its staff is in need of additional training. Without an effective field liaison function, organized on a regional basis, CA/FPP does not have adequate contact with designated FPMs at posts abroad. Officers abroad involved in ongoing fraud cases lack and badly need a point of contact in the Department to ensure that all fraud data is properly reported to the information and trend analysis units. A recognized, designated point of contact for each post would strengthen communication with the field and provide an intelligence collection point for debriefing FPMs and supervisory officers returning from post. In addition, training guidance is an important aspect of field liaison.

Both OIG visits to the field and responses to the questionnaire indicated that, in its current configuration, CA/FPP does not effectively support field operations with their individual problematic fraud cases. Responsibility to serve as a point of contact for FPMs is assigned to various CA/FPP personnel with little guidance or

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<sup>21</sup> State 219643 of October 12, 2004, concerning assignment opportunities in CA/FPP.

understanding of the responsibilities this role should entail. Fraud prevention activities, including training, intelligence analysis, and guidance to the field, cannot be separated from fraud cases reported from posts if this office is to support the field. Casework was formerly a significant and well received part of the work of CA/FPP. Loss of this support role meant that CA/FPP lost some of its relevance. Officers designated as having regional responsibility do not, with few exceptions, proactively support the field. While CA/FPP has in fact assigned points of contact roles, consular officers at posts were not aware that such colleagues were available for information-sharing and guidance. Inquiries to FPMs in the Office of Passport Services (CA/PPT) indicate that they had almost no contact with CA/FPP and did not seek its advice on individual problem cases. CA needs to commence a dialogue with posts, offering to assist with individual fraud cases, and identify staff in FPP to carry out this function.

**Recommendation 9:** The Bureau of Consular Affairs should realign staff in the Office of Fraud Prevention Programs by transferring some employees from training to field liaison duties. (Action: CA)

CA and DS established the Vulnerability Assessment Unit in 2003. The unit currently consists of one Foreign Service consular officer and a DS agent. The unit's main focus is on the detection and prevention of possible consular employee malfeasance. It analyzes consular data, processes and develops systems to identify risk factors and vulnerabilities, provides training, and develops management tools and materials. Among its initial achievements, the unit developed an operations manual for data mining, developed a case-tracking system, and conducted malfeasance training for consular managers and all basic consular training courses. The role of the unit is evolving, and staffing will need to be reviewed as its role expands. Both bureaus engaged in a commendable proactive approach in establishing the unit.

The preeminence of DS in investigating and prosecuting consular fraud was recognized with the creation of investigator positions under the MOU. Nevertheless, line adjudicators, both visa officers and passport examiners, remain at the forefront in detecting fraud and referring cases for investigation. CA/FPP must emphasize the importance of detection and help prepare adjudicators for this function through training and by communicating trends and other intelligence to the field. During the inspection CA/FPP drafted its first of a proposed series of

cables reviewing post fraud reporting on topics of general interest.<sup>22</sup> That office has also distributed its very useful Fraud Digest to posts. A key element is collecting and analyzing reporting from the field. Although SOP 53 (03 State 340565) calls for fraud detection reporting, OIG observed insufficient follow-up or compliance in the field. Posts were not given clearer reporting guidelines similar to those requirements levied on ARSO-Is. This process would benefit from negative reports and appropriate follow up. The Visas Viper reporting process can serve as a model.

OIG has encountered examples of high-quality reports that could be used as models, such as the current fraud reports from London and Kiev. The excellent London report, called "Megamail," is distributed to an eager but limited audience as often as post resources allow its publication. London's reporting should be supported and given even wider distribution by CA/FPP, which should also encourage similar efforts. As an international travel hub, London encounters applicants from all over the world. Its reports detail deteriorating country conditions and the related attempts at fraud. CA/FPP is in a position to seek out and promote good models. The lack of worldwide fraud reporting and report-sharing has resulted in some FPUs virtually operating in the absence of relevant information. A standard requirement should also require posts and passport agencies to report on the incidents of fraud that the post failed to detect until after visa or passport issuance. Such cases make excellent lessons-learned reports to the field, and help to ensure that a successful fraud scheme is not repeated at other unsuspecting posts.

Most posts report that little is being done to collect, evaluate, and distribute the material developed in the field that should be disseminated to FPUs at other posts. Trend reporting is not done on a regular basis, and the reporting from the field is not sufficiently shared, even with other posts in the region. For example, Central American posts are encountering more Chinese and Korean transients, as are posts in the Middle East. South American posts are seeing an increase in Lebanese applicants, and Moscow recently reported on Internet dating scams to obtain visas. At CA's initiative, a trends assessment unit was recently established in CA/FPP. The person who staffs the unit is new to the job and has just begun to tackle these issues. DS and CA are now considering an appropriate staffing level to carry out this function of preparing regular reports to the field providing intelligence on new trends in illegal immigration, trafficking, and related fraud.

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<sup>22</sup> State 201237 of September 17, 2004.

**Recommendation 10:** The Bureau of Consular Affairs should require regular and rigorous fraud reporting from posts and passport agencies, using a standard format, and establish a mandatory quarterly reporting schedule. (Action: CA)

**Recommendation 11:** The Bureau of Consular Affairs should analyze incoming fraud intelligence and regularly distribute the resulting intelligence and trend reports to the field. (Action: CA)

Civil Service officers assigned to CA/FPP who are charged with supporting field operations have little or no chance to visit the regions for which they are responsible or gain the area expertise necessary to assist officers in the field. This greatly limits the effectiveness of their support for the field. Furthermore, absent recent completion of the current 31-day Basic Consular Course at FSI, such employees could not be commissioned as consular officers. This severely restricts CA's ability to use their services as a resource tool.

**Recommendation 12:** The Bureau of Consular Affairs should require Civil Service employees in the Office of Fraud Prevention Programs to take the Basic Consular Course, or refresher training on appropriate portions of the course, as well as appropriate area studies courses available at the Foreign Service Institute. (Action: CA)

## Office of Fraud Prevention Programs Training Responsibilities

The 9/11 Commission states that constraining terrorist travel should become a vital part of U.S. counterterrorism strategy. Their report declares:

Better technology and training to detect terrorist travel documents are the most important immediate steps to reduce America's vulnerability to clandestine entry. Every stage of our border and immigration system should have as a part of its operations the detection of terrorist indicators on travel documents.<sup>23</sup>

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<sup>23</sup> The 9/11 Commission Report, page 385.

CA/FPP actively participates in the fraud prevention segment of FSI's Basic Consular Course. The office also trains FPMs during a one-week course (PC-541) conducted at FSI, and from February 23-27, 2004, three OIG inspectors audited that course. Students' and FSI staff reaction to recent training sessions has not been favorable, especially when compared with similar modules provided by other bureaus and agencies. Participants were particularly critical of CA/FPP's out-moded training materials and the predominantly "talking heads" lecture format. A lecturer/top-down approach is currently used rather than practical "hands on" interaction with participants. Several CA/FPP staff members rotate the training responsibilities, which results in inconsistency and very mixed presentations. Few are experienced trainers, and some are simply not temperamentally suited to be effective trainers. Their teaching methods and materials need improvement. They do not yet work from a standard course outline to ensure proper coverage of essential issues. Trainers need to make better use of PowerPoint presentation features and lecture scripts with prompting notes, make a greater effort to show each participant how to use ultraviolet "black" lights and other counterfeit document detection devices to better identify counterfeit documents, and provide a persuasive explanation of what FPP can do for them when they are at posts.

CA/FPP should work with FSI staff to develop better teaching strategies in order to train their trainers. FSI's Curriculum and Staff Development division offers courses designed to enhance the skills of instructors and has staff members available to assist Department offices with training design, program evaluation, professional development, facilitation services, and team-building. Some FPP training staff have taken the introductory Basic Facilitation and Delivery Skills course (PD 513) with mixed results. FPP's fraud prevention training materials are also in need of review and upgrading.

**Recommendation 13:** The Foreign Service Institute should, in coordination with the Bureau of Consular Affairs, design and implement a training program to instruct Office of Fraud Prevention Programs staff members on how to improve their methods of teaching fraud detection techniques. (Action: FSI, in coordination with CA)

## Passport Services and Fraud Prevention

Among officials engaged in monitoring alien travel, it is common wisdom that a U.S. passport would be any terrorist's choice of an ideal travel document. As CA and DHS make visa fraud more difficult, and entering the United States harder for aliens misrepresenting their intentions, the U.S. passport will come under increasing pressure as the most desirable vehicle for the terrorist. Once admitted, the terrorist who enters using a U.S. passport faces virtually no restrictions on his or her travel. Passport fraud can take the form of obtaining a legitimate passport using a false claim to citizenship or false identity, or altering a stolen passport for the use of another person. Passport fraud prevention measures must keep pace with visa fraud prevention. The 9/11 Commission has endorsed "implementing new security measures for U.S. passports..."<sup>24</sup>

Chairman of the House Committee on the Judiciary, Congressman F. James Sensenbrenner, Jr., has stated that:

Validly issued U.S. passports are a valuable commodity for criminals and terrorists, as reflected by their high street value on the black market. Further, the reliability of these documents is a critical aspect of our nation's efforts to secure our borders against alien criminals and terrorists. By contrast, the improper issuance of valid passports poses a significant risk to the American people. Such a document would give a potential terrorist unlimited access to travel around the world and reenter the United States with little or no scrutiny.<sup>25</sup>

CA/PPT and CA/FPP approved guidelines for responsibilities regarding the passport fraud program in March 2003. The guidelines have not been implemented, and the effort was not successful. OIG queried the offices involved and found that they were not aware of their responsibilities, nor had they been given the resources to carry them out. CA/FPP has focused exclusively on visa fraud in most of its work. Guidance and support concerning applications for U.S. passports at embassies and consulates abroad fall under CA's Overseas Citizens Services. The Overseas Citizens Services offices involved similarly carried out virtually no fraud prevention activities. These passport fraud prevention activities should be the responsibility of CA/FPP.

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<sup>24</sup> The 9/11 Commission Report, page 187.

<sup>25</sup> Letter to the Deputy Inspector General, Department of State, August 9, 2004.

**Recommendation 14:** The Bureau of Consular Affairs should make its Office of Fraud Prevention Programs responsible for dealing with fraud prevention related to overseas passport cases. (Action: CA)

Regarding domestic passport services on the other hand, CA initiated a restructuring of the passport office during the course of the inspection. Under this proposal, CA/PPT will now have a new Office of Passport Integrity and Internal Control Programs with a staff of eight employees. That office will be responsible for fraud prevention support, malfeasance detection, casework assistance and coordination, maintaining and analyzing fraud statistics, and liaison with DS and CA/FPP. OIG commends this initiative but notes that basic fraud prevention factors remain the same whether passports or visas or related travel documents and procedures are involved. In considering whether this new office should be located within CA/FPP or CA/PPT, OIG appreciates the uniqueness and massive volume of domestic passport operations as compared with overseas consular operations. OIG is concerned, however, that the proposed separation could hinder effective liaison between this new office and CA/FPP and might therefore adversely affect crucial sharing of fraud intelligence. CA argues that CA/PPT is responsible for all aspects of the passport adjudication and production function. Separating fraud prevention from the adjudication function would reduce accountability and remove the passport integrity function from Passport Services. Doing so could well result in additional confusion about roles and responsibilities and hamper, rather than ameliorate, anti-fraud efforts. CA also stated that it would ensure continuing contact between both offices, with each sending a liaison person to the others' staff meetings. OIG plans to revisit this question in the future.

CA/PPT has FPM positions at the passport agencies and centers. In 2002, OIG conducted a review of the domestic passport operations fraud prevention program.<sup>26</sup> The review was undertaken, in part, because antifraud programs came into sharper focus after the September 11, 2001, terrorist attacks. OIG made several recommendations for program improvement. One was to conduct a workload analysis to determine appropriate staffing levels for the fraud prevention program in each passport-issuing office.<sup>27</sup> CA concurred with the recommendation and established a new assistant FPM position at one of the most understaffed passport issuing centers. Shortly thereafter, the position was withdrawn along with

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<sup>26</sup> Review of Domestic Passport Operations, Phase II: Fraud Prevention Programs, Report Number ISP-CA-03-25, December 2002.

<sup>27</sup> Ibid., Recommendation 5. Assistant Fraud Prevention Manager positions are mentioned throughout the report.

all similar positions at other passport agencies, and the staff originally assigned to those positions was reassigned to adjudication sections. As part of the compliance process OIG then requested a workload analysis and justification for CA's determinations on staffing for the fraud prevention program in each passport office. Thus far, CA has not provided OIG with the analysis.

To understand better the impact of this sudden change of direction, OIG interviewed DS agents working with passport fraud, CA/FPP officers, and all passport agency FPMs, none of whom were consulted prior to the announcement of the decision to abolish the assistant FPM position in late 2003. All of the stakeholders claimed they would have opposed this personnel policy had they been consulted. During the course of this review, OIG learned that a congressional committee had requested the Government Accountability Office (GAO) to review the Department's efforts to detect and prevent passport fraud. This request came in response to a complaint by a federal employees' union representing Passport Services employees. The union had expressed concerns about the effect that the elimination of this position would have on detection of passport fraud.

To further its own inquiry into this issue, OIG asked the passport FPMs to provide statistical information on the percentage of potential fraud cases referred for further evaluation. Fifteen offices responded. The percentage of referrals for the first five months of 2003 and the first five months of 2004 were compared. Two of the offices saw an increase, one remained the same, but 12 underwent a decrease as overall passport cases were increasing. There was a 20 percent decrease in fraud referrals at the same time as overall total cases increased about 17 percent. Both of the large issuing centers reported a substantial decrease in referrals, as did several of the larger passport agencies including New Orleans, Los Angeles, and Philadelphia. These responses indicated that the trend is toward fewer potential passport fraud referrals at a time when national security concerns point to a need for greater vigilance as evidenced by government warnings indicating an increase in the likelihood of terrorist attacks. This decrease in percentage of referrals coincides with CA's elimination of the assistant FPM position. OIG concludes that elimination of the assistant FPM position has had negative repercussions on the passport fraud detection program.



process to detect questionable documents presented to post personnel by applicants vying for nonimmigrant and immigrant visas, as well as testing pertinent U.S. citizenship documents. The bureau has high hopes that this full page document reader, called a document authenticator, will be a useful tool to resolve questions concerning the authenticity of travel documents. A final decision will be based on extensive testing with 22 different documents from various countries. Assuming the document reader pilot test is successful and a procurement and worldwide deployment plan is completed, CA should make the reader available to CA/FPP and to select high volume consular sites such as London, Mexico City and Manila as soon as possible.

**Recommendation 16:** The Bureau of Consular Affairs should provide the office of Fraud Prevention Programs and suitable posts with large consular operations with the document authenticator currently being tested, if the test is successful. (Action: CA)

Every DS agent interviewed raised the lack of direct access to the Federal Bureau of Investigation's National Crime Information Center database, which is available to other agencies at post, as a serious hindrance to fulfilling their duties. The DS agents were obliged to ask colleagues in other agencies at post or stationed in domestic offices to conduct National Crime Information Center name checks.

**Recommendation 17:** The Bureau of Diplomatic Security should make the Federal Bureau of Investigation's National Crime Information Center database available at the desktops of all regional security officers abroad and should negotiate memoranda of understanding with other agencies to gain access to relevant databases. (Action: DS)

Other key databases at DHS, the Drug Enforcement Administration, Department of Justice, and Central Intelligence Agency were also unavailable to visa and passport adjudicators. Another matter that concerned officers was the extensive lag time between Visas Viper submissions at posts and their entry into CLASS. <sup>(b)(2)</sup>  
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. FDL experts conduct comparative analyses of questionable documents and forensic examinations of foreign or domestic documents and altered documents.

Although some FPMs have compiled exemplars unique to their post, these are often incomplete and not always kept current. Foreign governments and security printing companies produce detailed descriptions of their document security features, but posts rarely collect these. CA/FPP should task FPMs to collect and forward such exemplars to the Department for review and onward transmission to FDL. Appropriate analyses from FDL should then be returned to the posts by CA/FPP.<sup>31</sup> OIG understands that CA/FPP has now begun to scan exemplars of malafide documents received from posts onto its e-room website which will then have worldwide accessibility.

**Recommendation 19:** The Bureau of Consular Affairs should collect both valid and counterfeit travel documents from posts, forward such exemplars to the Department of Homeland Security's Forensic Document Laboratory, and distribute the resulting analyses to appropriate posts. (Action: CA)

Only a few posts located at transport hubs would benefit from a sophisticated, well-equipped document laboratory. Most, including many high-volume, high-fraud posts, see a very limited range of documents and those almost exclusively from one or two countries. These posts can develop the necessary expertise in identifying locally produced fraudulent documents relatively easily. Others, and London is an excellent example, encounter an extremely diverse range of documents. London's success at detecting fraudulent, stolen, and counterfeit documents suggests that their use of additional equipment, training, and exemplars should be replicated elsewhere. Further, posts like London, given appropriate resources, could provide regional support to other posts with less expertise. Selected posts should be given additional funding for more advanced equipment.

**Recommendation 20:** The Bureau of Consular Affairs should survey consular sections at high-volume posts with diverse applicant populations to determine where major regional document fraud detection facilities are appropriate and should establish them. (Action: CA)

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<sup>31</sup> See Recommendation 26.



**Recommendation 22:** The Bureau of Consular Affairs should send to all posts a list of standard equipment necessary for document examination, together with a fund citation for requesting such equipment. (Action: CA)

Most travelers attempting to enter the United States with fraudulent documents do so via international airlines. Airline and airport officials represent an important impediment to these travelers if they are properly trained and equipped. The Immigration and Naturalization Service (INS) historically conducted such training and provided limited equipment, and this function is still handled by DHS at a few posts. The equipment is not of any value unless the staff is trained and encouraged to use it.

airline personnel to encourage them to more rigorously inspect travel documents presented during boarding procedures. Opportunities also exist for consular sections to provide document fraud training to local border police and airline personnel.

**Recommendation 23:** The Bureau of Consular Affairs, working with the Department of Homeland Security, should provide guidance and equipment to consular sections for document fraud training to local border police and airline personnel. (Action: CA)

## LIAISON WITH OTHER AGENCIES

In the United States, two federal departments have responsibility for governance of the visa process: the Departments of State and Homeland Security. Consistency and orderliness dictate that these two departments work very closely together to carry out this function harmoniously in the national interest. The creation of DHS, absorbing as it has both INS and the Bureau of Customs, is having a major impact on fraud prevention efforts. Legacy INS operations have been merged with those of the Bureau of Customs and divided among three separate divisions. These include: Citizenship and Immigration Services, Immigration and Customs Enforcement, and Customs and Border Protection. The

Department's responsibilities overlap with each of these entities. With the new emphasis on fraud prevention as an element of border security, it is important to understand just how effectively the two departments are meeting the new challenge. DHS has made significant strides in establishing offices and programs to detect and prevent consular fraud.

Experience has shown that liaison officers exchanged between agencies directly facilitate cooperation, improve performance, and concretely assist in meeting the performance goals of both departments. The Department has a long history of personnel exchanges with legacy INS and exchanges with other departments - the Department of Defense representative in the Department's Operations Center comes to mind - that have proven their worth many times over. Today, with DHS stationing agents in certain posts abroad, more intense Department liaison at DHS, with officers who have access to databases and systems of both departments, would be a logical step to further joint operations. (See also Recommendation 18.)

DHS, in response to a GAO report's recommendations, established a new Office of Fraud Detection and National Security. GAO found in DHS many of the same problems that OIG observed in the Department during this program review.<sup>32</sup> For example, GAO noted that DHS was unaware of the extent of its fraud problem, that it had difficulty balancing its dual responsibilities of timely processing of immigration benefit applications and detecting fraudulent applications, and that better guidelines were needed for the field to use in deciding which fraud cases to pursue. DHS has responded to GAO's criticisms and is addressing both the specific problems and the key goal of identifying the Office of Fraud Detection and National Security's responsibilities in detecting and preventing immigration benefits fraud. Department and DHS officers are exposed to different aspects of document fraud, and there is an ideal opportunity for interagency cooperation and synergy. There are opportunities for CA to work with DHS and have an equal influence on joint initiatives and matters of mutual interest.

During OIG's visits to posts for both the purpose of this review and other regular inspections, visa adjudicators complained of extensive fraud related to visa petitions received from DHS service centers. Consular officers returned those fraudulent petitions to DHS for revocation only to have them reappear at post bearing a pro forma "reviewed" stamp from the same service center. The fraudulent aspects of those petitions were obviously not seriously considered. Responses

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<sup>32</sup> U.S. General Accounting Office report on Immigration Benefit Fraud, GAO-02-66, January 2002.

to the OIG questionnaire revealed the same problem. The director of the Office of Fraud Detection and National Security at DHS informed OIG that fraudulent petition benefits fell within his purview and that he was eager to pursue the problem. He was unaware of any direct dealings by his office with anyone in CA/FPP, and enthusiastically welcomed the exchange of liaison officers between the two offices to act on this and related immigration benefits fraud issues.

DHS is both a frequent end user of intelligence developed by the Department on fraud and national security threats and a provider of similar data to the Department. It is a common problem that information obtained through CLASS or the Passport Information Electronic Record System by DHS is incomplete or unclear to the requesting DHS officer. Many occasions arise when a better understanding of Department procedures or databases would substantially improve cooperation between the two departments. The same circumstances are true at the Department when information is sought from DHS sources.

The Bureau of Immigration and Customs Enforcement includes the Office of Foreign Operations, which is responsible for a Visa Security Unit. That unit is charged with supporting the DHS officers stationed abroad under Section 428 of the Homeland Security Act. Those DHS officers are responsible for providing guidance and training to the consular officers stationed at their posts. Policy guidelines, operational procedures, and general criteria are being developed within DHS. Currently the Bureau of Immigration and Customs Enforcement regularly interacts with DS and the CA's Visa Services office, but very little, if any, contact exists with CA/FPP. Clearly, closer cooperation between the two departments at this level and at this stage of development is called for, particularly in fraud prevention matters.

**Recommendation 24:** The Bureau of Consular Affairs should seek closer ties with the Department of Homeland Security's Office of Foreign Operations and its Visa Security Unit, and the Office of Fraud Detection and National Security, to share fraud deterrence intelligence and establish a program to exchange fraud officers. (Action: CA)

Several departments and agencies of the U.S. government are interested either directly or indirectly in consular fraud, usually regarding border security. Contacts exist locally and occasionally regionally at the working level between employees of the various agencies, but little has been done to encourage or facilitate these

efforts. Few agencies have guidelines clarifying authority to share fraud intelligence or coordinate actions with consular officers. This is an area that will need to be further examined once CA/FPP is effectively restructured.

At this point, CA/FPP is fully engaged with DS in matters concerning consular fraud prevention and border security. However, there are several other bureaus within the Department that actively share in these responsibilities. In particular, the Coordinator for Counterterrorism, the Bureau of Intelligence and Research, and the Bureau of International Narcotics and Law Enforcement Affairs all have significant involvement. CA/FPP has virtually no working relationship with these offices and bureaus, with the exception of the Bureau of International Narcotics and Law Enforcement Affairs. When those offices were visited by OIG, none were able to identify CA/FPP contact persons or recent activities in which CA/FPP was involved. CA/FPP no longer has an officer on detail to the Office to Monitor and Combat Trafficking in Persons. Although CA/FPP currently lacks expertise in some fields, DS is vigorously pursuing its border security responsibilities. While CA/FPP develops its expertise, it should continue the strong cooperation with DS as a way of developing further contacts within the Department.

**Recommendation 25:** The Bureau of Consular Affairs should develop closer working contacts with bureaus and offices within the Department involved in border security. (Action: CA)

The DHS Immigration and Customs Enforcement division has an outstanding FDL with an online document library including both legitimate and fraudulent exemplars. FDL conducts comparative analyses of disputed documents and forensic examinations of any foreign or domestic documents, stamps, seals, and restoration of obliterated or altered documents. CA/FPP has developed a strong informal working relationship with FDL but still does not have electronic access to its document library. The Department should continue to establish the closest possible working relationship with this lab, not only by making use of its resources but also by contributing material for inclusion. CA/FPP could alert all posts to FDL's support capabilities and act as a facilitator in moving document intelligence between Washington and the posts. This would further enhance not only the Department's fraud detection ability but also that of the U.S. government as a whole.

Both CA and DS officers cited the need for detailed document training to determine authenticity of documents. FDL is the U. S. government's key repository of such documents and expertise. CA/FPP could serve as a facilitator for Department contacts with FDL and organize visits to, and briefings by, their experts. FSI is also considering arranging visits to the FDL for its consular trainees.

**Recommendation 26:** The Bureau of Consular Affairs should initiate negotiations with the Department of Homeland Security to maximize cooperation between the Office of Fraud Prevention Programs and the Forensic Document Laboratory to gain full access to its library and expertise and to continue contributing to the laboratory's documents collection. (Action: CA)

EPIC is an interagency operation that collects data on illegal movement of people, fraudulent documentation, and related matters. It originally focused on drug trafficking and immigration violations on the U.S.-Mexican border. EPIC's current geographic area includes all of the United States and all other countries in the Western Hemisphere where the movement of illegal aliens is directed to the United States. The center has a staff of several hundred people from 15 federal agencies, two Texas state agencies, and the Royal Canadian Mounted Police. They share data with law enforcement agencies nationwide.

EPIC's Watch Program operates 24 hours a day, seven days a week responding to telephone calls, faxes, and teletypes. It provides real-time information from 33 federal databases, including the National Crime Information Center, six commercial databases, and EPIC's internal database. EPIC prides itself on its ability to bring together in one place the databases from each of its participating agencies. EPIC also has a research and analysis section and a tactical operations section to support foreign and domestic intelligence and operational needs.

OIG, as part of a multiphased program review, issued a report entitled Review of Domestic Passport Operations Phase II: Fraud Prevention Programs. The report found that, "...the Department is a participating agency, but it does not staff any EPIC positions. It does query EPIC resources, primarily the Watch Program, fairly routinely through its INS contacts." Based on analysis of the number of inquiries made by the Department through FY 2001, OIG recommended that:

The Bureau of Consular Affairs and the Bureau of Diplomatic Security should determine whether full-time staffing at the El Paso Intelligence Center is appropriate for either one or both bureaus. If they determine that a full-time presence is not warranted, they should establish rotational training assignments for fraud prevention managers and special agents.<sup>33</sup>

The recommendation was directed to the Bureaus of Consular Affairs and Diplomatic Security because, in the current national security environment, their presence should enhance gathering intelligence and verifying document authenticity.

The two bureaus were not able to reach an agreement on this recommendation by the time this inspection began. Consequently, OIG agreed to visit the center, interview staff who process Department inquiries, and update the statistics to determine whether the original recommendation is still valid. The number of inquiries has increased by approximately one-third since the earlier recommendation, and based on current data comparison the numbers keep rising. Management at EPIC stated that they were going to conduct a workload analysis to determine what, if any, support they could continue to provide the Department. The DHS analyst at EPIC responsible for processing Department inquiries told OIG that she was obliged to destroy fraudulent documents because she no longer had the time to conduct analyses and identify trends.

**Recommendation 27:** The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should determine whether a full-time position at the El Paso Intelligence Center is needed to handle the increasing number of Department of State inquiries. (Action: CA, in coordination with DGHR)

**Recommendation 28:** The Bureau of Diplomatic Security should determine whether full-time staffing at the El Paso Intelligence Center is appropriate, and if it determines that a full-time presence is not warranted, the bureau should establish rotational training assignments for special agents. (Action: DS)

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<sup>33</sup> Review of Domestic Passport Operations Phase II, ISP-CA-02-32, February 2002, Recommendation 14. This recommendation has now been transferred from the original report and reissued here since OIG believes that appropriate Department staffing at EPIC offers real opportunities to enhance U.S. border security and fraud prevention programs.



## CONCLUSIONS

The Department has cited fraud deterrence and prevention as key elements of its border security policy in the post-September 11, 2001, environment. However, more needs to be done to achieve the full level of support for front line visa and passport adjudicators. The Department's leadership can improve its deterrence strategy by fostering a better appreciation of the importance of its antifraud responsibilities and by securing the funding to provide the human and financial resources necessary to carry them out more effectively. Preventing entry into the United States by aliens intent on harming the country begins at the level of passport adjudication and visa adjudication abroad. Effective fraud prevention provides the intelligence and training that enables these adjudicators to detect and thwart the intentions of criminals and terrorists from obtaining U.S. passports and visas. The 9/11 Commission recommended that, "The U.S. should combine terrorist travel intelligence, operations, and law enforcement in a strategy to intercept terrorists, find terrorist travel facilitators, and constrain terrorist mobility."<sup>34</sup> OIG shares this assessment.

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<sup>34</sup> The 9/11 Commission Report, page 385.



## FORMAL RECOMMENDATIONS

**Recommendation 1:** The Bureau of Consular Affairs should recommend that Congress amend the Immigration and Nationality Act to render aliens found to have intentionally committed fraud under the diversity visa program permanently ineligible to obtain U.S. visas in any category. (Action: CA, in coordination with H)

**Recommendation 2:** The Bureau of Consular Affairs should provide continuing, detailed guidance to fraud prevention managers at posts abroad, to enable them to better prioritize and carry out their responsibilities. (Action: CA)

**Recommendation 3:** The Bureau of Consular Affairs, in coordination with the regional bureaus, should budget for, schedule, and hold regular regional fraud prevention conferences to encourage the exchange of intelligence and cooperation in the field. (Action: CA)

**Recommendation 4:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Consular Affairs, should require overseas posts to provide fraud prevention managers with designated office space suitable for using and storing antifraud documents and equipment. (Action: OBO, in coordination with CA)

**Recommendation 5:** The Bureau of Consular Affairs should require all posts to develop post-specific fraud-related training modules for all consular positions, including fraud profiles and material appropriate to line adjudicators, fraud prevention managers, and Foreign Service national investigators. (Action: CA)

**Recommendation 6:** The Bureau of Consular Affairs should review overseas staffing and prepare a plan to establish uniform criteria for creating fraud prevention manager positions overseas, and determine where full-time fraud prevention manager positions should be established. (Action: CA)

**Recommendation 7:** The Bureau of Consular Affairs, in coordination with the Bureau of Diplomatic Security, should request the Bureau of Human Resources to develop and publish precepts directing the appropriate selection panels to accord special consideration for promotion to fraud prevention managers with excellent performance records. (Action: CA, in coordination with DS)

**Recommendation 8:** The Bureau of Diplomatic Security should develop more standardized training using reports of successful assistant regional security officer-investigator malfeasance investigations, redacted as needed, as lessons-learned training guides. (Action: DS)

**Recommendation 9:** The Bureau of Consular Affairs should realign staff in the Office of Fraud Prevention Programs by transferring some employees from training to field liaison duties. (Action: CA)

**Recommendation 10:** The Bureau of Consular Affairs should require regular and rigorous fraud reporting from posts and passport agencies, using a standard format, and establish a mandatory quarterly reporting schedule. (Action: CA)

**Recommendation 11:** The Bureau of Consular Affairs should analyze incoming fraud intelligence and regularly distribute the resulting intelligence and trend reports to the field. (Action: CA)

**Recommendation 12:** The Bureau of Consular Affairs should require Civil Service employees in the Office of Fraud Prevention Programs to take the Basic Consular Course, or refresher training on appropriate portions of the course, as well as appropriate area studies courses available at the Foreign Service Institute. (Action: CA)

**Recommendation 13:** The Foreign Service Institute should, in coordination with the Bureau of Consular Affairs, design and implement a training program to instruct Office of Fraud Prevention Programs staff members on how to improve their methods of teaching fraud detection techniques. (Action: FSI, in coordination with CA)

**Recommendation 14:** The Bureau of Consular Affairs should make its Office of Fraud Prevention Programs responsible for dealing with fraud prevention related to overseas passport cases. (Action: CA)

**Recommendation 15:** The Bureau of Consular Affairs should reestablish assistant fraud prevention manager positions in all large passport agencies and centers and determine whether positions are needed at smaller agencies. (Action: CA)

**Recommendation 16:** The Bureau of Consular Affairs should provide the office of Fraud Prevention Programs and suitable posts with large consular operations with the document authenticator currently being tested, if the test is successful. (Action: CA)

**Recommendation 17:** The Bureau of Diplomatic Security should make the Federal Bureau of Investigation's National Crime Information Center database available at the desktops of all regional security officers abroad and should negotiate memoranda of understanding with other agencies to gain access to relevant databases. (Action: DS)

**Recommendation 18:** The Bureau of Consular Affairs should initiate negotiations for a memorandum of understanding with the Department of Homeland Security and other pertinent departments that would facilitate two-way sharing of all databases pertaining to visa and passport issuance. (Action: CA)

**Recommendation 19:** The Bureau of Consular Affairs should collect both valid and counterfeit travel documents from posts, forward such exemplars to the Department of Homeland Security's Forensic Document Laboratory, and distribute the resulting analyses to appropriate posts. (Action: CA)

**Recommendation 20:** The Bureau of Consular Affairs should survey consular sections at high-volume posts with diverse applicant populations to determine where major regional document fraud detection facilities are appropriate and should establish them. (Action: CA)

**Recommendation 21:** The Bureau of Consular Affairs, in coordination with the Foreign Service Institute, should require that practical training in the use of counterfeit document detection equipment be part of basic consular training. (Action: CA, in coordination with FSI)

**Recommendation 22:** The Bureau of Consular Affairs should send to all posts a list of standard equipment necessary for document examination, together with a fund citation for requesting such equipment. (Action: CA)

**Recommendation 23:** The Bureau of Consular Affairs, working with the Department of Homeland Security, should provide guidance and equipment to consular sections for document fraud training to local border police and airline personnel. (Action: CA)

**Recommendation 24:** The Bureau of Consular Affairs should seek closer ties with the Department of Homeland Security's Office of Foreign Operations and its Visa Security Unit, and the Office of Fraud Detection and National Security, to share fraud deterrence intelligence and establish a program to exchange fraud officers. (Action: CA)

**Recommendation 25:** The Bureau of Consular Affairs should develop closer working contacts with bureaus and offices within the Department involved in border security. (Action: CA)

**Recommendation 26:** The Bureau of Consular Affairs should initiate negotiations with the Department of Homeland Security to maximize cooperation between the Office of Fraud Prevention Programs and the Forensic Document Laboratory to gain full access to its library and expertise and to continue contributing to the laboratory's documents collection. (Action: CA)

**Recommendation 27:** The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should determine whether a full-time position at the El Paso Intelligence Center is needed to handle the increasing number of Department of State inquiries. (Action: CA, in coordination with DGHR)

**Recommendation 28:** The Bureau of Diplomatic Security should determine whether full-time staffing at the El Paso Intelligence Center is appropriate, and if it determines that a full-time presence is not warranted, the bureau should establish rotational training assignments for special agents. (Action: DS)

## INFORMAL RECOMMENDATIONS

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent regional bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess that entity's progress in implementing the informal recommendations.

Some embassies and consulates have developed excellent fraud prevention segments of their post-specific newcomer consular officer training programs. These should receive wide dissemination for use by other posts.

**Informal Recommendation 1:** The Bureau of Consular Affairs should collect, adapt for general use and disseminate to all posts the fraud prevention training programs that could serve as models.

The three Foreign Service national investigator position levels have no standardized position descriptions or career ladders, and have underrated job levels relative to other FSN positions. In reevaluating these positions under the new computer assisted job evaluation system, the Department should rectify these inadequacies.

**Informal Recommendation 2:** The Bureau of Human Resources should use the computer assisted job evaluation system to review the three FSN fraud investigator position descriptions with a view to creating a promotion ladder and appropriate position classifications.

The DS-CA memorandum of understanding authorizing Bureau of Diplomatic Security investigators to assist with fraud prevention operations is not fully understood by consular fraud prevention managers. A bureau representative should explain the investigators' role to Fraud Prevention for Consular Managers classes (PC-541) given at the Foreign Service Institute.

**Informal Recommendation 3:** The Bureau of Diplomatic Security should provide an officer to describe the assistant regional security officer investigators' function at the Foreign Service Institute.



## ABBREVIATIONS

ARSO-I	Assistant regional security officer-investigator
CA	Bureau of Consular Affairs
CA/FPP	Bureau of Consular Affairs, Office of Fraud Prevention Programs
CA/PPT	Bureau of Consular Affairs, Office of Passport Services
CAJE	Computer Assisted Job Evaluation
CLASS	Consular Lookout and Support System
Department	Department of State
DHS	Department of Homeland Security
DS	Bureau of Diplomatic Security
DV	Diversity Visa
EPIC	El Paso Intelligence Center
FDL	Forensic Document Laboratory
FPM	Fraud prevention manager
FPU	Fraud prevention unit
FSI	Foreign Service Institute
FSN	Foreign Service national
FSN-I	Foreign Service national-Investigator
GAO	Government Accountability Office; prior to July 7, 2004, General Accounting Office
INS	Immigration and Naturalization Service
MOU	Memorandum of Understanding
OIG	Office of Inspector General
SOP	Standard operating procedure

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