



U.S. Citizenship
and Immigration
Services

Memorandum

TO: International Operations Staff

FROM: Joanna Ruppel /s/
Chief, International Operations

DATE: January 31, 2018

SUBJECT: Implementation of Enhanced Vetting Guidance for I-730 Refugee Cases Abroad

This memorandum implements additional enhanced vetting requirements for processing I-730 *Refugee/Asylee Relative Petitions* filed by refugees for qualified family members abroad (I-730 Refugee cases) as mandated by the Joint Memorandum to the President, and EO 13815, Resuming the United States Refugee Admissions Program with Enhanced Vetting Capabilities. It includes implementation guidance for Interagency Checks (IACs), Security Advisory Opinions (SAO), and Enhanced FDNS Review (EFR). It applies only to Form I-730 Refugee cases abroad, including follow-to-join refugee Travel Eligibility¹ and Adjudication cases. It is effective February 1, 2018 and supersedes previously issued guidance.

Please note that International Operation's (IO) International Adjudications Support Branch (IASB) is assuming responsibility from Service Center Operations (SCOPS) for the pre-processing of I-730 Refugee cases to support the vetting process. As part of case pre-processing, IASB will be requesting the I-730 Refugee beneficiary's Form I-590 (*Registration for Classification as Refugee*) upfront to enable more thorough vetting, and to facilitate submission to FDNS of those cases requiring EFR vetting.²

Interagency Checks (IACs) Requirements

All I-730 Refugee beneficiaries ages 14 to 79 must clear Interagency Checks (IACs) prior to issuance of travel documents. For I-730 Adjudication cases, the adjudicator must verify that interagency checks have cleared before approving Form I-730. Because of the length of post-interview, I-730 processing, interagency checks must be requested for beneficiaries who are age 13 or older at interview and otherwise eligible.

¹ Travel Eligibility cases are I-730s that were transferred to international offices after initial approval by Service Center Operations before IO assumed jurisdiction over approval of I-730s transferred to international offices abroad.

² Additional information about the role of IASB and the support it will provide will be forthcoming.

Subject: Implementation of Enhanced Vetting Guidance for I-730 Refugee Cases Abroad

Page 2

(b)(7)(e)

The mechanism for requesting interagency checks varies based on whether I-730 Refugee case processing is supported by a Resettlement Support Center (RSC) or the Department of State (DOS) Consular Affairs (CA).

A. *RSC supported I-730 Refugee Processing* (Kenya and Thailand)

At locations with RSC processing support, the RSC initiates the IAC request via the Worldwide Refugee Admissions Processing System (WRAPS). The Case and Activity Management for International Operations (CAMINO) system automatically uploads submission from WRAPS and result information from the IAC vetting partners. [REDACTED]

[REDACTED] These background checks do not display an expiration date in CAMINO. However, IAC checks do expire after 2.5 years.³

[REDACTED] Adjudicators must also check the IAC result in WRAPS to ensure validity [REDACTED]

[REDACTED] See graphic below). This is required because there may be a time lag between an event requiring an IAC resubmission⁴ and the actual resubmission (displayed in CAMINO as [REDACTED])



The attached *RSC_IAC Data Fields* document lists data fields that require an IAC resubmission if modified. When international field office staff discover changes in such data, staff must inform the RSC of the changes and wait to receive results from a new IAC, i.e. [REDACTED]

[REDACTED]

B. *Consular supported I-730 Refugee Processing*

At locations without RSC support, the adjudicator must request a Merlin SAO for beneficiaries requiring interagency checks. [REDACTED]

[REDACTED] To accomplish this, CA has expanded its Merlin SAO requests such that these SAOs are now also routed to IAC vetting partners for refugee follow-to-join cases. Thus, all I-730 refugee follow-to-join beneficiaries age 14 to 79 processed without RSC assistance require an SAO Merlin, even if the beneficiary is not from a country that requires a nationality-based Merlin SAO.

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³ WRAPS IACs are partially recurrent (vetting partners periodically re-run submitted data but the data is not automatically updated). IACs expire after 2.5 years due to the data retention policy of one of the vetting partners.

⁴ When RSCs update certain fields in WRAPS, the WRAPS IAC Bio-Diff field flips to YES. This means a new IAC is required but not yet submitted. Once the Refugee Processing Center (RPC) submits a new IAC request, the IAC Bio-Diff field flips back to NO.

Subject: Implementation of Enhanced Vetting Guidance for I-730 Refugee Cases Abroad

Page 3

Given the time it takes for the vetting process and to ensure the most accurate information is submitted, field office staff should request Merlin SAOs only after completion of interview⁵ and only for otherwise eligible beneficiaries, ages 13 to 79 at the time of interview. Only Immigrant Visa (IV) sections can submit Merlin SAOs that encompass IAC vetting partners.⁶ The attached *ALDAC, Revised Procedures for Processing Follow-To-Join Refugee Applications*, provides updated instructions for requesting a Merlin SAO from the IV section at post. Additional instructions are forthcoming.

As a best practice, field office staff should verify that the IV section successfully submitted the SAO Merlin by checking Consular Consolidated Database (CCD) - SAO Lookup. Refer any SAOs pending over a year to IO I-730 program managers for follow-up and expedite consideration. Provide beneficiary's name, DOB, as well as the SAO request number and SAO request date from CCD - SAO Lookup. The program manager will contact CA's Visa Office to request expedite processing.

Merlin Security Advisory Opinion (SAO) - Expanded Requirements

Merlin SAO requirements also depend on whether CA or an RSC supports I-730 Refugee case processing. For cases processed with CA support, Merlins are required for all I-730 Refugee beneficiaries age 14-79. This requirement is broader since CA uses the SAO to complete IACs. For cases processed with RSC support, the SAO Merlin requirement is narrower because the IAC check is run separately, and mirrors the SAO Merlin requirement for Form I-590 Refugees. RSC-submitted SAO Merlins are required for beneficiaries who are (i) ages 14 to 50, and (ii) nationals of a country requiring an SAO, or stateless persons who last habitually resided in an SAO country.⁷ See *PRM's PROGRAM ANNOUNCEMENT 2018-05: Changes to Security Advisory Opinion (SAO) Requirements*.

Enhanced FDNS Review Requirements

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For cases pending abroad, cases of beneficiaries interviewed prior to October 24, 2017 are not required to undergo EFR, nor are cases pending administrative closure or denial. Finally, EFR is a one-time requirement. The check does not expire and is not subject to a re-run requirement. However, should additional information be revealed during an interview that raises national security concerns, an IO

⁵ Exceptions may be made on a case-by-case basis for urgent expedite cases. Staff should contact an IO HQ I-730 program manager in such instances.

⁶ Non-Immigrant Visa sections will no longer submit Merlin SAOs for I-730 Refugee processing, but will continue to submit Merlin 92 SAOs for I-730 Asylee processing when required.

⁷ For the list of nationalities see Bureau of Population, Migration and Refugees (PRM's) *Program Announcement 201705*. These include Egypt, Iran, Iraq, Libya, Mali, North Korea, Somalia, Sudan, Republic of South Sudan, Syria, Yemen, and certain stateless Palestinians.

Subject: Implementation of Enhanced Vetting Guidance for I-730 Refugee Cases Abroad

Page 4

FDNS officer may resubmit the case for EFR as part of the Controlled Application Review and Resolution Program (CARRP). Where practicable, EFR checks should be completed prior to interview.

EFR Requirements Summary:

For I-730 Refugee cases pending abroad, beneficiaries require EFR if:

1. SAO-country nationals or stateless persons residing in an SAO-country;⁸ and
2. Age 12 or older (12 for EFR-SM and 14 for EFR-ID); and
3. Not interviewed prior to Oct 24, 2017; and
4. Not pending denial or administrative closure; and
5. Not previously subject to EFR. (Unless there are specific reasons for IO FDNS to request another EFR as noted above.)

A. Pending Cases: EFR Checks Submission Instructions

If a pending case abroad requires EFR, international field office staff must perform the following steps to initiate EFR-SM and EFR-ID checks:

i. Cases processed without RSC support

1. Issue a Request for Evidence (RFE) for a completed Form I-590 if the beneficiary has not already submitted it. If the version of the Form I-590 used precedes the current 12/15/17 version, the beneficiary must also submit Form G-325C.
2. Enter all applicable information into CAMINO. The attached CAMINO Quick Guide, *Submitting EFR Checks for I-730 Refugee Cases Pending Abroad*, provides instructions on data entry requirements.
3. Add the “EFR – SM” and “EFR – ID” background checks to the beneficiary’s person profile in CAMINO. Leave the submit date blank. CAMINO will automatically submit a weekly batch email to FDNS to initiate the EFR checks. FDNS provides results for the EFR-SM and EFR-ID check separately, which will be automatically uploaded into CAMINO. If derogatory information comes back on a case, Programs and Integrity Branch (PIB) FDNS IOs will follow-up directly with the appropriate Field Office.
4. Contact IO’s I-730 program managers, if expedite processing is required.

ii. Cases processed with RSC support

Instructions for requesting EFR checks for I-730 cases processed with RSC support are forthcoming.

B. Future Cases: EFR Checks Completed Domestically

New cases that require EFR will arrive abroad with completed EFR checks. The IASB will initiate EFR checks during domestic pre-processing and the results will be recorded in CAMINO, i.e., beneficiary’s EFR-SM and EFR-ID background check modules. For purposes of EFR, the beneficiary’s age freezes at the time IASB transfers the case abroad. Thus, a beneficiary will not

⁸ Ibid.

Subject: Implementation of Enhanced Vetting Guidance for I-730 Refugee Cases Abroad

Page 5

age into the EFR requirement after a case arrives abroad. IASB will include information on any EFR hits in the I-730 case packet. Adjudicators must review this information and, if necessary, address it during the interview. For approved cases, EFR hit documentation must be mailed to the National Records Center (NRC) along with other security check documents – they should not be included in the beneficiary’s travel packet.

All I-730 Refugee cases where travel documents were issued on or before February 1, 2018

All I-730 Refugee cases that received valid travel documents on or before the effective date of this memorandum (February 1, 2018) are allowed to travel as planned. This category of cases includes cases with expired travel documents that do not require a re-interview for reissuance. Field office directors may re-issue travel documents for such cases after verifying the validity of the assurance, medical, and security checks (as required prior to implementation of this memorandum). If the medical exam or a security check has expired, the travel document may be re-issued once the new medical exam or security check is completed. Staff may issue travel letters in locations CA is unable to reprint boarding foils.

Change in Locations Processing I-730 Refugee Cases

Consular Affairs Non-Immigrant Visa (NIV)-only posts have stopped processing I-730 Refugee Cases. Jurisdiction over I-730 Refugee caseloads at NIV-only posts is being transitioned to designated Immigrant Visa (IV) posts and USCIS international field offices.⁹ Affected beneficiaries may request to transfer their cases to another IV post or USCIS international field office when travel to the IV-designated post presents a hardship. USCIS international field offices should attempt to accommodate such transfer requests when feasible.

Further guidance for affected USCIS international field offices and an updated Country-Specific Responsibility Matrix SOP appendix is forthcoming. Meanwhile, offices processing I-730 refugee cases without RSC or IV post support should contact IO’s I-730 program managers for further guidance.¹⁰

I-730 Asylum Cases

As a reminder, additional vetting requirements and jurisdictional shifts discussed in this memorandum only apply to I-730 Refugee cases and not I-730 Asylum cases (I-730s filed by individuals granted asylum in the United States).

Changes to the I-730 Adjudication SOP incorporating this memorandum are forthcoming. Please refer any questions to IO’s I-730 program managers. IO HQ will be scheduling calls with the international staff to review this guidance and answer any questions.

⁹ The USCIS Nairobi and Johannesburg International Field Office are the only offices to be so designated. USCIS Nairobi is responsible for I-730 refugee cases from Uganda, and Burundi. USCIS Johannesburg is responsible for I-730 refugee cases from Mozambique, Swaziland and Lesotho.

¹⁰ Currently, these are the Rome, Mexico City, and Beijing Field Offices.

Appendices:

- 1a. ALDAC: *Revised Procedures for Processing Follow-To-Join Refugee Applications* (Jan. 30, 2018)
- 1b. ALDAC: IAC_Merlin SAO Additional Information Template
- 1c. ALDAC: IAC_Data Fields_IVO and SAO
2. *CAMINO Quick Guide: Submitting EFR Checks for I-730 Refugee Cases Pending Abroad*
3. *RSC IAC Data Fields*