



Comprehensive Immigration Reform at DHS

MITRE's Perspective

Senate Bill S.744 recently passed and momentum is building toward a final version of comprehensive immigration reform (CIR). As such, The MITRE Corporation—operator of multiple Federally Funded Research and Development Centers—reviewed S.744 and believes the Department of Homeland Security (DHS) must own all aspects of CIR and manage the initiative at the department level to ensure coordination between the components that will be impacted by the policy and/or responsible for implementation.

- **The mandates in the bill are sequenced, conditioned upon one another happening, and will require joint agency responses.**
 - Border Security and Worksite Enforcement results must precede the Earned Legalization and Visa Reform aspects.
 - Earned Legalization and Visa Reform mandates will require coordination with U.S. Citizenship and Immigration Services and the Internal Revenue Service.
- **The timeframes for implementation of the mandates are aggressive and will require immediate attention to manage risk and ensure compliance.**
 - The DHS Secretary will have one year to issue the interim final regulation for application procedures, processing fees, and documentation.
- **Significant changes to process, technology, and organizational constructs will be required.**
 - The E-Verify System and Immigration Benefits processing capability must be updated to deliver two to three times current demand and an Agriculture Worker compliance and tracking system must be developed and deployed.
 - An additional 22,000 Customs and Border Protection operators will be required, as well as increased border and port of entry technology and infrastructure.
- **Mission operational effectiveness must not degrade due to response to mandates.**

MITRE Recommendation

As the final version of CIR becomes clear, **DHS must quickly establish a project office at the department level with dedicated staff** to:

- Integrate CIR transition planning and monitoring, establish program-level metrics, manage risks and issues
- Manage schedule, funding, contracts, and resource prioritization
- Coordinate performance reporting, communication, and stakeholder engagement
- Provide DHS cross-component governance and cross-government coordination
- Coordinate with program offices at component level