



*The City of New York  
Office of the Comptroller  
Bureau of Management Audit*

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**WILLIAM C. THOMPSON, JR.**  
*Comptroller*

**Audit Report on the New York City  
Department of Youth and Community Development's  
Citizenship New York City Program**

**MG01-186A**

*June 13, 2002*



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Department of Youth and Community  
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**EXECUTIVE SUMMARY**

**Background**

The Department of Youth and Community Development (DYCD) supports youth and community services throughout New York City through contracts with a broad network of community-based organizations. In July 1997, DYCD initiated the Citizenship New York City (CNYC) program to provide citizenship services to legal immigrants (immigrants who have a green card or permanent visa) living in New York City. This program, which is directly administered by DYCD, was created as the result of the federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996.

PRWORA changed almost every aspect of alien eligibility for federal, state, and local government assistance programs. It established comprehensive new restrictions on the eligibility of legal aliens for public assistance and further restricted public benefits for illegal aliens and non-immigrants (here to visit, attend school, or work temporarily). PRWORA eliminated virtually all eligibility of immigrants for Supplemental Security Income (SSI) and food stamps.

One of the ways immigrants remain eligible for federal benefits is by becoming naturalized U.S. citizens. To be naturalized, aliens must have continuously resided in the United States for five years as permanent residents, must show that they have good moral character, must demonstrate the ability to read, write, speak, and understand English, and must pass an examination on U.S. government and history.

The CNYC manual, dated June 1999, defines its current target population as legal permanent residents living in New York City who are eligible for naturalization and are receiving or applying for SSI or food stamps, or whose food-stamp or SSI eligibility has been discontinued because of immigration

status. With the help of the New York City Human Resources Administration (HRA) and the Department of Homeless Services (DHS), CNYC is able to identify immigrants at risk of losing or being denied federal benefits.

CNYC also assists legal immigrants who neither receive nor seek federal benefits but simply want to become citizens. It has offices in each of the five boroughs, in neighborhoods with large concentrations of immigrants. Each center provides information and free assistance with citizenship applications, required photographs, and referrals for English and U.S. history and civics classes. According to CNYC officials, the staff also makes home visits to help homebound individuals with their applications.

CNYC also operates a community outreach program in which its representatives visit organizations such as schools, senior centers, churches, and hospitals to provide applications, information, and assistance to immigrants in these organizations. Further, its telephone bank of six operators calls persons whose names are received from HRA to determine if they are eligible for citizenship and to inform them that CNYC can provide assistance in the naturalization process. The phone bank also handles unsolicited calls from immigrants seeking information.

## **Objectives**

The objectives of this audit were to determine (1) the effectiveness of the CNYC program and (2) whether funds were expended on program-related goods and services.

## **Scope and Methodology**

The scope of our audit was originally limited to Fiscal Year 2000, but we expanded the scope to include Fiscal Years 1998, 1999, and 2001, to cover all the years that the program has been in operation. To familiarize ourselves with the CNYC program we interviewed program officials and staff members, and reviewed the CNYC Policy and Procedure Manual. We also visited the Queens field office to observe the activities at the office and to understand the process that takes place when an individual walks into the office to apply for citizenship.

We chose a random sample of 100 records from the CNYC database that contained a listing of 236,941 immigrants. We reviewed the contact screens for each individual to determine the number of people CNYC successfully contacted and the number of individuals who filed citizenship applications with INS. We reviewed an additional 25 records of individuals who had completed the application process to determine whether they were part of CNYC's target

population and the length of time it took CNYC to conduct its supervisory and quality review of their applications.

## **Results in Brief**

CNYC measures its effectiveness by the number of applications it submits to INS. Based on this measurement, CNYC is doing a good job. The number of applications completed by CNYC and submitted to INS has steadily increased from 5,607 in Fiscal Year 1998 to 10,273 in Fiscal Year 2001. The number of appointments made and applicants served has also increased each year. Additionally, CNYC's OTPS funds were used appropriately for goods and services that were necessary and applicable to the program.

However, improvements can be made to further enhance the program, especially in terms of measuring its effectiveness. Although CNYC knows the number of applications it submitted to INS, it does not know whether the applicants it assisted ultimately became U.S. citizens. CNYC has not initiated a formal process (e.g., routine correspondence with applicants) to try to determine the outcome of its efforts, even though one of CNYC's original objectives was to "track naturalization applicants throughout the entire process to successful completion."

We also reviewed the contact screens for 100 records in the CNYC database and concluded that the CNYC staff did not always attempt to contact all of the individuals in the database, as required by its manual. Specifically, CNYC's staff did not attempt an outreach to 14 individuals, and did not complete its outreach to seven individuals. Moreover, CNYC contacted four individuals who should not have been contacted, since outreach had already been completed. Lastly, CNYC's manual failed to address the steps that should be taken by the staff when the person that they are trying to contact has a disconnected telephone.

In addition, CNYC does not report on what percentage of individuals who completed the application process were at risk, even though that information is available in the CNYC database. Furthermore, during our review, the CNYC database did not have a date field indicating when the applicant's name was entered in the system. Lastly, we reviewed the contact screens for 25 individuals who completed the application process with CNYC and determined that the supervisory review and the forwarding of applications to INS were not always done in a timely fashion.

This audit makes 13 recommendations, which are listed below. CNYC officials should:

1. Formalize the process for determining the citizenship status of program applicants.

2. Develop and report upon performance indicators that set goals and then measure the actual outcome of the program (i.e., the number of applicants who become U.S. citizens) as a percentage of applications submitted to INS.
3. Ensure that the staff completes all outreach efforts to each individual in its database.
4. Ensure that the staff does not make additional contacts in cases where contact has already been completed.
5. Ensure that the CNYC manual addresses what steps should be taken when telephone numbers are disconnected.
6. Ensure that the Event Listing case notes include all attempts at contact, including letters that are sent through bulk mailings.
7. Continue to generate exception reports to ensure that all individuals in the system are receiving the necessary outreach.
8. Require that the staff obtain and record the risk status of walk-in applicants in the Information and Retrieval screen.
9. Report in the Mayor's Management Report the percentage of applications filed with INS for individuals who were at risk. This would indicate how well CNYC is accomplishing its mission.
10. Determine whether CNYC's stated mission of preparing naturalization applications for immigrant New Yorkers who seek to become citizens in order to retain or attain eligibility for federal public benefits is still viable. If not, a revised mission statement should be promulgated.
11. Make sure that the CNYC database continues to maintain a visible and accessible date field that shows when individual names are entered in the system.
12. Ensure that whenever possible supervisory reviews are done on the day that processing is completed, when the applicant is present, as required by the CNYC protocol.
13. Consider defining an acceptable time frame between the quality assurance review and the forwarding of applications to INS. This time frame should be specified in the CNYC manual.

## **Agency Response**

The matters covered in this report were discussed with officials from CNYC during and at the conclusion of this audit. A preliminary draft report was sent to the DYCD officials on April 29, 2002, and discussed at an exit conference held on May 7, 2002. On May 15, 2002, we submitted a draft report to DYCD officials with a request for comments. We received a written response from DYCD officials on May 30, 2002. The response stated in part:

“DYCD would like to thank the Comptroller’s Office for its continuous communication with DYCD officials throughout the course of the audit. These discussions made us aware of areas for improvement and allowed us to implement corrective action plans immediately.”

DYCD agreed with nine recommendations (one of which it has implemented and one of which it has partially implemented), partially agreed with recommendations #2 and #8, and disagreed with recommendations #9 and #10.





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**INTRODUCTION**

**Background**

The Department of Youth and Community Development (DYCD) supports youth and community services throughout New York City through contracts with a broad network of community-based organizations. In July 1997, DYCD initiated the Citizenship New York City (CNYC) program to provide citizenship services to legal immigrants (immigrants who have a green card or permanent visa) living in New York City. This program, which is directly administered by DYCD, was created as the result of the federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996.

PRWORA changed almost every aspect of alien eligibility for federal, state, and local government assistance programs. It established comprehensive new restrictions on the eligibility of legal aliens for public assistance and further restricted public benefits for illegal aliens and non-immigrants (here to visit, attend school, or work temporarily). PRWORA eliminated virtually all eligibility of immigrants for Supplemental Security Income (SSI) and food stamps.

One of the ways immigrants remain eligible for federal benefits is by becoming naturalized U.S. citizens. To be naturalized, aliens must have continuously resided in the United States for five years as permanent residents, must show that they have good moral character, must demonstrate the ability to read, write, speak, and understand English, and must pass an examination on U.S. government and history.

The objectives of CNYC as stated in its Website are: 1. To reach the population deemed most at risk of losing or not obtaining federal benefits (with special emphasis on SSI beneficiaries and food stamp recipients); 2. To prepare and submit naturalization applications in

an expeditious manner; 3. To enhance and provide support services to facilitate the naturalization application process; and 4. To track naturalization applicants throughout the entire process to successful completion and citizenship.

The CNYC manual, dated June 1999, defines its current target population as legal permanent residents living in New York City who are eligible for naturalization and are receiving or applying for SSI or food stamps, or whose food-stamp or SSI eligibility has been discontinued because of immigration status. With the help of the New York City Human Resources Administration (HRA) and the Department of Homeless Services (DHS), CNYC is able to identify immigrants at risk of losing or being denied federal benefits.

HRA works with the Social Security Administration to generate lists of individuals who receive federal benefits. It sends that data to DHS, which transmits it to CNYC in a form compatible with the CNYC computer system. CNYC loads the data into its database for tracking client information. HRA also refers to CNYC, on a case-by-case basis, individuals who are at risk of losing or not obtaining food stamp or Supplemental Security Income benefits due to non-citizenship status.

CNYC also assists legal immigrants who neither receive nor seek federal benefits but simply want to become citizens. It has offices in each of the five boroughs, in neighborhoods with large concentrations of immigrants. Each center provides information and free assistance with citizenship applications, required photographs, and referrals for English and U.S. history and civics classes. According to CNYC officials, the staff also makes home visits to help homebound individuals with their applications.

CNYC also operates a community outreach program in which its representatives visit organizations such as schools, senior centers, churches, and hospitals to provide applications, information, and assistance to immigrants in these organizations. Further, its telephone bank of six operators calls persons whose names are received from HRA to determine if they are eligible for citizenship and to inform them that CNYC can provide assistance in the naturalization process. The phone bank also handles unsolicited calls from immigrants seeking information.

CNYC prepares applications at its centers for immigrants who have been in the United States for four years and nine months or longer. After applications are completed, they are reviewed by a supervisor and forwarded to the Central Office, where there is a quality assurance review on each application. Applications are then submitted to the Immigration and Naturalization Service (INS). There are two types of applications: the N-400 application is for immigrants above the age of 18; the N-600 application is for immigrant children of U.S. citizens. (Immigrant children of immigrant parents are not eligible for citizenship until the age of 18.)

Figures from the CNYC database show that 31,795 applications were submitted to INS from Fiscal Year 1998 through Fiscal Year 2001. Statistics showing the numbers of appointments made, applicants served, and applications submitted to CNYC for these years appear in Table I, below.

**TABLE I**

Appointments Made, Applicants Served, and Applications Submitted to INS  
Fiscal Years 1998 to 2001

<b>Fiscal Year</b>	<b>Appointments Made</b>	<b>Applicants Served</b>	<b>Applicants Served as a Percentage of Appointments Made</b>	<b>Applications Filed with INS</b>	<b>Applications filed as a Percentage of Applicants Served</b>
1998	9,763	7,436	76%	5,607	75%
1999	12,863	9,562	74%	8,002	84%
2000	13,549	10,040	74%	7,913	79%
2001	16,661	12,764	77%	10,273	80%
Total	52,836	39,802	75%	31,795	80%

In Fiscal Year 2001, CNYC spent \$4,189,160 to administer the program—\$3,345,505 on Personal Services expenses and \$843,655 on Other Than Personal Services (OTPS) expenses. CNYC has approximately 96 employees serving in different capacities. DYCD’s main office has 14 administrative and support staff workers, including staff analysts, lawyers, and application specialists. Nineteen employees work at CNYC’s Central Office, including 12 outreach workers, five administrative staff workers, and two quality assurance workers. The five field offices collectively have approximately 63 employees.

## **Objectives**

The objectives of this audit were to determine (1) the effectiveness of the CNYC program and (2) whether funds were expended on program-related goods and services.

## **Scope and Methodology**

The scope of our audit was originally limited to Fiscal Year 2000, but we expanded the scope to include Fiscal Years 1998, 1999, and 2001, to cover all the years that the program has been in operation. To familiarize ourselves with the CNYC program we interviewed program officials and staff members, and reviewed the CNYC Policy and Procedure Manual. We also visited the Queens field office, accompanied by the Executive Director, to observe the activities at the office and to understand the process that takes place when an individual walks into the office to apply for citizenship.

We conducted telephone interviews with 21 community-based organizations that provide immigration and citizenship services, as well as organizations in two other states that provide services similar to those of CNYC. We contacted those organizations to determine whether they provide the same services as CNYC and whether they use similar procedures.

We chose a random sample of 100 records from the CNYC database that contained a listing of 236,941 immigrants. We reviewed the contact screens for each individual to determine the number of people CNYC successfully contacted and the number of individuals who filed citizenship applications with INS. We reviewed an additional 25 records of individuals who had completed the application process to determine whether they were part of CNYC's target population and the length of time it took CNYC to conduct its supervisory and quality review of their applications.

We also reviewed the database screens that listed the N-400 and N-600 applications that had been forwarded to INS for processing. We selected a sample of 41 of the applicants and checked their telephone numbers, using the white pages on the Internet, to determine whether the information provided to CNYC reflected verifiable data and whether applicants could be reached for follow-up.

In addition, we selected and reviewed all 52 purchase orders, totaling \$170,764, issued in Fiscal Year 2001 to determine whether CNYC funds were expended on program-related goods and services.

Our audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS), and included tests of the records and other auditing procedures considered necessary. This audit was performed in accordance with the City Comptroller's audit responsibilities as set forth in Chapter 5, § 93, of the New York City Charter.

## **Agency Response**

The matters covered in this report were discussed with officials from CNYC during and at the conclusion of this audit. A preliminary draft report was sent to the DYCD officials on April 29, 2002, and discussed at an exit conference held on May 7, 2002. On May 15, 2002 we submitted a draft report to DYCD officials with a request for comments. We received a written response from DYCD officials on May 30, 2002. The response stated in part:

“DYCD would like to thank the Comptroller's Office for its continuous communication with DYCD officials throughout the course of the audit. These discussions made us aware of areas for improvement and allowed us to implement corrective action plans immediately.”

DYCD agreed with nine recommendations (one of which it has implemented and one of which it has partially implemented), partially agreed with recommendations #2 and #8, and disagreed with recommendations #9 and #10.

**OFFICE OF THE COMPTROLLER  
NEW YORK CITY  
DATE FILED: JUNE 13, 2002**

## **FINDINGS AND RECOMMENDATIONS**

CNYC measures its effectiveness by the number of applications it submits to INS. Based on this measurement, CNYC is doing a good job. The number of applications completed by CNYC and submitted to INS has steadily increased from 5,607 in Fiscal Year 1998 to 10,273 in Fiscal Year 2001. The number of appointments made and applicants served has also increased each year. Additionally, CNYC's OTPS funds were used appropriately for goods and services that were necessary and applicable to the program.

However, improvements can be made to further enhance the program, especially in terms of measuring its effectiveness. Specifically, since CNYC began in 1997, no effort has been made to determine how many applicants served by CNYC actually become U.S. citizens. We also found that CNYC's telephone outreach efforts could be improved, and that CNYC does not track whether applicants assisted were at risk of losing benefits. In addition, the supervisory review and forwarding of applications to INS were not always timely and during our audit the CNYC client information tracking database did not show the date that each applicant's name was entered in the system.

### **CNYC Does Not Measure and Report on the Number of Assisted Applicants Who Become Citizens**

Although CNYC knows the number of applications it submitted to INS, it does not know whether the applicants they assisted ultimately became U.S. citizens. CNYC officials said that they have met with INS several times to convince the agency to share this information with them, but to date have been unsuccessful. They supplied us with a copy of a memo from the INS New York District Director to the CNYC Executive Director, stating that the INS was unable to meet CNYC's request to provide citizenship status. CNYC officials also stated that they rely on applicants to let CNYC know if they have been successful in obtaining citizenship. CNYC was able to provide us with documentation to show that some individuals do in fact inform CNYC when they obtain their citizenship. However, CNYC's staff has not initiated a formal process (e.g., routine correspondence with applicants) to try to determine the outcome of their efforts, even though one of CNYC's original objectives was to "track naturalization applicants throughout the entire process to successful completion."

We contacted the Los Angeles City College Citizenship Center to learn about that program and determine whether they have a system in place to track the number of applicants who become citizens. There were many similarities between the Los Angeles City College Citizenship Center and CNYC, although CNYC is larger. The Los Angeles center provides free application assistance, INS-required photographs, and provides classes in history, government, and preparation for the INS interview. The Los Angeles center also has an outreach program, and it tracks the number of applicants who become citizens. The Los Angeles center uses person-to-person contact to determine each applicant's current status. It also sends out prepaid postcards, asking individuals to report whether or not they have become citizens. According to

the Director of the Los Angeles Center approximately 90 percent of the individuals they assist become citizens.

We conducted telephone interviews with 21 New York City community-based organizations and determined that they perform services similar to CNYC, also free of charge. Many of these centers (15 out of the 21) informed us that they track the number of applicants who become citizens through phone calls or mailings, or from information received from INS.

We discussed this issue with CNYC officials and received a memorandum, dated April 2, 2002, from DYCD's Director of Internal Review. The memo stated, "In August 2001 CNYC began directly contacting people we assisted to apply for citizenship in 1997 and 1998 to find out if they had become citizens, randomly selecting a sample of 891 cases. CNYC was able to contact 336 clients from this sample, and of those 253 [75%] reported they had become U.S. citizens." The memo also stated that after September 11, 2001, CNYC's telephone lines and computer systems were disconnected, and that CNYC resumed its outreach activities on March 18, 2002, after it regained computer communications at its central office.

CNYC should formalize the process for determining the citizenship status of former applicants, and then establish performance indicators to measure the program's success, based on citizenship-status outcomes for program applicants. It should not, as was past practice, rely on applicants to inform it of their citizenship status. The practice of contacting individuals, which CNYC said it started in August 2001 and resumed in March 2002, should continue on a formalized basis, and be supplemented by mailings when necessary. These actions should take place within a specified time, bearing in mind that INS takes an average of nine months to process an application. Once the information is obtained, it should be entered in the CNYC database, where it can be summarized and later reported on.

## **Recommendations**

CNYC officials should:

1. Formalize the process for determining the citizenship status of program applicants.

**DYCD Response:** "As discussed at the Exit Conference, DYCD already has begun formalized processes to determine the citizenship status of CNYC applicants. These include: a) conducting a telephone survey of applicants CNYC assisted in 1997 and 1998. . . . b) providing applicants with pre-paid postcards to mail to CNYC upon completion of the naturalization process (to begin in July 2002). c) enhancing the computer system's capacity to alert CNYC outreach workers to attempt to make contact with clients one year after their applications have been filed with INS. In addition, DYCD will continue to petition the federal INS to grant us formal information about clients' citizenship status."

2. Develop and report upon performance indicators that set goals and then measure the actual outcome of the program i.e., the number of applicants who become U.S. citizens, as a percentage of applications submitted to INS.



**DYCD Response:** “As was discussed at the Exit Conference, the Department already tracks controllable performance indicators for CNYC—such as the number of applications submitted to INS. DYCD cannot control the rate at which the federal INS grants citizenship. Such a measurement is not a measurement of DYCD’s performance but of the performance of the federal government. Further, as previously discussed, the federal INS has declined to share information about whether applicants assisted by CNYC have gained citizenship. Until the time that DYCD is able to obtain this information directly from the INS, the Department will only be able to report on the number of clients that it has been able to contact one year after they have completed CNYC’s services and who voluntarily share their immigration status with DYCD.

**Auditor Comments:** DYCD stated in its response to recommendation #1 that it has begun to formalize processes to determine the citizenship status of CNYC applicants. If DYCD does so, it should report on the number of clients it has been able to contact and the number who have indicated their citizenship status.

## **CNYC Can Improve Its Outreach**

We reviewed the contact screens for 100 records in the CNYC database and concluded that the CNYC staff did not always attempt to contact all of the individuals in the database, as required by its manual. Specifically, CNYC’s staff did not attempt an outreach to 14 individuals, and did not complete its outreach to seven individuals. Moreover, CNYC contacted four individuals who should not have been contacted, since outreach had already been completed. Lastly, CNYC’s manual failed to address the steps that should be taken by the staff when the person that they are trying to contact has a disconnected telephone.

When CNYC receives from HRA the names of immigrants at risk of losing or not obtaining federal benefits, these names are entered in the CNYC client information tracking database, along with the corresponding addresses, telephone numbers, and other information. Once these names are in the system, CNYC contacts individuals to verify their eligibility for citizenship and to make appointments to assist them in filling out their applications.

According to the CNYC Policy and Procedure Manual, outreach is considered complete if CNYC has attempted outreach and determined that the individual falls within one of the following categories:

- Already Applied: client already applied for citizenship;
- Deceased;
- Declined Assistance: client declined CNYC’s assistance;
- Failed Contact/Letter Sent: at least three telephone contacts have been made to contact the client and a letter has been sent to him or her;
- Intake Scheduled: an appointment has been scheduled;
- Phone Disconnected: client’s phone is disconnected, out of service, etc.;
- Wrong Phone #/Letter Sent: client’s phone number as listed in the system is incorrect;
- Wrong #/Letter Returned: letter to client was returned.

Based on our review of the contact screens for the 100 records in our sample, we found that CNYC made no attempt to contact 14 individuals in its system. We discussed this issue with CNYC officials and based on what we were told, it appears that CNYC's database system's deficiencies are the cause of this problem. The system failed to generate these 14 names for contact because certain data was missing from the files. For example, 12 of the 14 individuals had no listing of country of origin and five did not have Legal Permanent Residency dates. To address this issue, CNYC stated, "CNYC is working with the programming staff of the DYCD Information Technology department to improve the logic used to assign clients to the telephone bank operators so that CNYC outreach operators can most effectively reach potential clients."

In seven additional cases, where contact was attempted, CNYC did not complete its outreach. For example, in two of those seven cases no telephone contacts were attempted; the individuals only received information sent in a bulk mailing. In the other five cases, there were only one or two attempts to contact the individual by telephone. CNYC provided us with documentation to show that bulk mail letters were sent to three of these five individuals; however, although letters were sent, contact is still not considered complete because only one or two telephone contacts were attempted. According to the CNYC manual, outreach is considered complete when at least three attempts have been made to contact the client by telephone, and a letter has been sent. Therefore, overall, in 21 cases (21%) of the 100 that we reviewed, CNYC either made no attempt or did not complete contact with the individual.

Our review of the database also showed that there were four instances in which contact had already been completed as indicated in CNYC's case notes, but that the CNYC staff nonetheless made another one or two additional attempts to contact the individuals. For example, the case notes indicated that an individual contacted on August 25, 1997, was already a citizen; nevertheless, the CNYC staff contacted this person two more times—on April 13, 1998, and on June 22, 1998. In another example, on November 2, 2000, a staff member sent a letter to an individual whose telephone number was incorrectly listed. Nevertheless, another telephone call was made to the same individual on November 11, 2000. The CNYC manual clearly states that the staff should always look at the case notes to determine the outreach status of each client before attempting to make contact.

In addition, when bulk mail letters were sent to individuals, CNYC did not record this information in the Event Listing case notes. We were therefore unable to obtain a complete history of the outreach performed. For example, we found that CNYC attempted contact with two individuals, whose phones were disconnected. Both of those individuals received information in a bulk mailing, and this information was not recorded in the Event Listing case notes, but rather on a completely different screen. Therefore, the Event Listing is not a complete record of all outreach performed. Furthermore, the CNYC manual did not address what steps should be taken when an individual's phone has been disconnected. CNYC should consider recording all attempts at contacts, including bulk mailings, in the Event Listing case notes.

In summary, in some cases CNYC is not making any attempt at telephone contacts, is not completing contacts, or is making additional attempts when contact has already been completed.

After we discussed these issues with CNYC officials, they informed us that they now generate an exception report from the system to determine which individuals have not been contacted. CNYC should continue to generate exception reports to ensure that outreach is being made to all individuals in its system.

### **Recommendations**

CNYC officials should:

3. Ensure that the staff completes all outreach efforts to each individual in its database.

**DYCD Response:** “CNYC has developed an exception report to identify clients who have not been contacted. CNYC has already begun a mailing to these clients. CNYC is working to improve the logic for assigning clients to outreach workers to contact.”

4. Ensure that the staff does not make additional contacts in cases where contact has already been completed.

**DYCD Response:** “CNYC has re-instructed staff to review the outreach screen thoroughly before calling to ensure they do not conduct additional outreach after the requisite number of attempts have been made.”

5. Ensure that the CNYC manual addresses what steps should be taken when telephones are disconnected.

**DYCD Response:** “As discussed at the Exit Conference, the CNYC Manual has been under revision. This recommendation has been incorporated into the revised Draft. In addition, CNYC staff were instructed to send letters to prospective clients when they cannot be reached by telephone.”

6. Ensure that the Event Listing case notes include all attempts at contact, including letters that are sent through bulk mailings. This would ensure that all outreach attempts are recorded in one complete record.

**DYCD Response:** “The CNYC system automatically generates a notification on the information and referral screen when bulk mailings are sent to prospective applicants. At the Comptroller’s request, CNYC is working with the Information Technology Department to have this information appear as an event as well.”

7. Continue to generate exception reports to ensure that all individuals in the system are receiving the necessary outreach.

**DYCD Response:** “DYCD will continue to generate such exception reports.”

## **CNYC Does Not Report on the Number Of Applicants Assisted Who Were at Risk of Losing Public Benefits**

CNYC's mission, as stated in its manual, is to prepare naturalization applications for immigrants at risk of losing or not obtaining such benefits as SSI and food stamps. However, CNYC does not report on what percentage of individuals who completed the application process were at risk, even though that information is available in the CNYC database. CNYC reports in the Mayor's Management Report only the number of applications sent to INS. This information, although useful, is not a sufficient indicator of how well CNYC is accomplishing its mission.

We reviewed the Information and Retrieval and contact screens for 25 individuals who completed the application process with CNYC during Fiscal Year 2000. The Information and Retrieval screens for 17 of these individuals identified the risk factor as non-target (not at risk of losing or not obtaining benefits) and eight were assigned a risk factor (food stamps or SSI). However, CNYC officials said that they considered 13 of the 17 individuals at risk either because of their refugee status or because they had low-paying jobs. They provided documentation that eight of the 13 individuals were refugees, and that showed the jobs held by nine individuals (although no salaries were shown). If these individuals were actually considered at risk, CNYC should have recorded this information in the risk factor field of the Information and Retrieval screen.

According to CNYC officials, the definition of "at risk" has changed over time. CNYC was created to help immigrants most at risk of losing their public benefits as a result of welfare reform. CNYC officials said that although they continue to reach out to immigrants who receive public benefits, they have also given priority to a different group of immigrants who might at some future time need benefits but would be ineligible for them unless they were citizens.

If a large portion of immigrants assisted by CNYC are not currently at risk, but rather might at some future time need benefits, CNYC should reconsider its mission. Rather than stating that its mission is to prepare naturalization applications for immigrants at risk, CNYC should consider a more general mission statement, such as to prepare naturalization applications for all immigrant New Yorkers. Regardless of how it defines its mission, CNYC should include the number of immigrants assisted that are at risk in the Mayor's Management Report, along with the other statistics that it provides.

### **Recommendations**

CNYC officials should:

8. Require that the staff obtain and record the risk status of walk-in applicants in the Information and Retrieval screen.

**DYCD Response:** “. . . for those walk-in clients who wish to complete applications for citizenship, CNYC does already collect information about risk-status.”

**Auditor Comments:** Although CNYC states that it collects information about risk status, it is not recording the risk factor for all of the individuals that it determines to be at risk. Thirteen of the 17 walk-in applicants, in our sample, did not have a recorded risk factor. However, CNYC officials stated that they considered these 13 individuals at-risk—either because of their refugee status or because they had low-paying jobs. If CNYC actually considered these individuals at risk, CNYC should have recorded this information in the risk factor field of the Information and Retrieval screens.

9. Report in the Mayor’s Management Report the percentage of applications filed with INS for individuals who were at risk. This would indicate how well CNYC is accomplishing its mission.

**DYCD Response:** “As stated on DYCD’s website, ‘Citizenship NYC is a free City service that helps immigrant New York City residents to become naturalized citizens of the United States.’ As such, CNYC helps any New Yorker requiring assistance in completing naturalization applications. Citizenship NYC specializes in the needs of low-income, elderly, disabled, and young immigrants, helping them to apply for fee waivers, disability waivers, homebound naturalization interviews, and derivative citizenship. CNYC currently reports to the Mayor’s Office on the number of applications submitted to the INS, which reflects the number of people served who need citizenship to retain or attain federal benefits eligibility.”

**Auditor Comments:** We realize that CNYC provides application assistance to all New York City residents, not just those at risk, but as DYCD stated in its response to recommendation #8, “CNYC does already collect information about risk status.” Since CNYC collects this information, we are recommending that it be recorded in the risk factor field. Once it is recorded, CNYC will be able to determine the percentage of applications filed with INS for individuals who were at risk, and will be able to report this information in the Mayor’s Management Report. Since CNYC’s mission is to prepare naturalization applications for immigrants at risk of losing or not obtaining benefits, the number of individuals assisted that were at risk would be a measure of how well CNYC is accomplishing its mission.

10. Determine whether CNYC’s stated mission of preparing naturalization applications for immigrant New Yorkers who seek to become citizens in order to retain or attain eligibility for federal public benefits is still viable. If not, a revised mission statement should be promulgated.

**DYCD Response:** “CNYC currently prepares naturalization applications for immigrant New Yorkers who seek to become citizens in order to retain or attain eligibility for federal benefits. CNYC anticipates that it will continue to serve this population as well as those who may, in the near future, fall into this population. CNYC does not turn away immigrants from the services it offers.”

**Auditor Comment:** We realize, and CNYC agrees, that it not only assists immigrants who seek to become citizens in order to retain or attain eligibility for federal benefits, but assists all immigrants interested in becoming citizens. By calculating the number of immigrants assisted

that were at risk, CNYC can determine whether the majority of the population it is currently serving is at risk. If CNYC determines that a large percentage of the population is not at risk, we recommend that CNYC consider changing its mission statement.

### **Date Field is not Visible in Database**

The CNYC database used to maintain information for each immigrant did not have a date field indicating when the applicant's name was entered in the CNYC system. In order to perform a review, we therefore had to request the date the information was received from HRA and entered into the CNYC system. CNYC officials told us that the date field is located somewhere in the system and that obtaining date information would "involve a pretty detailed analysis of all the fields and sub-fields in the system to see where this information would lie." Based on this response, we did not pursue the request because it was apparent that date information was not readily available, accessible, or utilized.

Without having a date as a benchmark, we were unable to determine the length of time between the date of receipt of information from HRA and the date the client was contacted by the CNYC staff. In addition, for the 14 individuals mentioned previously, with whom CNYC made no attempt at outreach, we were unable to determine how long each individual's name had been in the system without any contact. For that matter, we were unable to determine the length of time that any individual's name was in the system before contact was made.

The date that the information is first entered in the CNYC system would be helpful to CNYC as well. For example, it would help supervisors determine whether there is timely outreach and processing of applications. The date would also show when information on individuals was received from HRA and would permit CNYC to complete contacts with individuals from an earlier list before initiating contacts to individuals on subsequent lists.

We met with CNYC to discuss the issue, stressing the importance of date information. Subsequent to our meeting, CNYC implemented this suggestion. The creation date for each entry is now visible in the database. CNYC should ensure that this information continues to be readily accessible in its database.

### **Recommendation**

CNYC officials should:

11. Make sure that the CNYC database continues to maintain a visible and accessible date field that shows when individual names are entered in the system.

**DYCD Response:** "DYCD has always maintained this information automatically in the database. DYCD has recently made this information available for viewing on the information and retrieval screen. The CNYC system will continue to maintain this information."

## **The Timeliness of the Application Process Can Be Improved**

After citizenship applications are completed, they are reviewed by a supervisor and are forwarded to the CNYC Central Office, where a quality assurance review is done on each application. The applications are then forwarded to the INS. We reviewed the contact screens for 25 individuals who completed the application process with CNYC and determined that the supervisory review and the forwarding of applications to INS were not always done in a timely fashion.

### **Supervisory Review**

The contact screens for 25 individuals who completed the application process with CNYC showed that it took an average of six business days between the completion and the supervisory review of the 25 applications.

According to the CNYC Policies and Procedures Manual, the supervisory review should take place while the applicant is present, ideally while the individual is being photographed. The supervisor is supposed to verify the accuracy of all parts of the application against supporting documents and “detect any issue that would, if discovered later, require the applicant to be contacted or called back in.” This means that the supervisory review should take place the same day that the application is completed, preferably while the applicant is still present at the center. Of the 25 contact screens reviewed, we determined that only one supervisory review was completed on the same day that the application was completed. For the other 24 applications, supervisory reviews were performed from one to 45 business days after the application was completed.

According to the CNYC manual, if a delay is needed for the supervisory review, the supervisor fills in a deferral date that does not exceed 10 business days after the application is submitted for processing. For six of the 25 applications, the supervisory review was done more than 10 business days after the processing was completed. In one instance, the processing was completed on April 18, 2000, and the supervisory review was not completed until June 19, 2000—45 business days later.

We discussed this matter with CNYC officials. They responded that in the cases where there were more lengthy delays, the delays were due to lack of information from the applicant. We noted that in some instances this was the case. However, CNYC should not consider an application to be complete until the applicant has submitted all documentation necessary for the application to be sent for supervisory review.

### **Forwarding of Applications to INS**

We reviewed the contact screens for the same 25 individuals and determined that it took an average of seven business days between the date the quality assurance review was completed and the date the application was forwarded to INS. In one instance, the quality review was

completed on June 16, 2000 but the application was not forwarded to INS until July 7, 2000—15 business days later. In another instance, the quality review was completed on June 23, 2000; however, the application was not forwarded to INS until July 7, 2000— 10 business days later.

The CNYC manual does not define a time frame between the quality assurance review and the forwarding of applications to INS. Therefore, CNYC should consider instituting an acceptable time frame between these two actions. This information should be included in its manual so that the staff will be aware of the time frame that they must adhere to. Depending on the volume of applications received, CNYC should consider forwarding the applications to INS at least weekly. Obviously, the sooner INS receives the application, the sooner the applicant will be considered for citizenship. This is the ultimate goal of CNYC.

### **Recommendations**

CNYC officials should:

12. Ensure that whenever possible supervisory reviews are done on the day that processing is completed, when the applicant is present, as required by the CNYC protocol.

**DYCD Response:** “CNYC supervisors currently conduct a pre-cursory review of applications while the applicant is on site. Due to volume of applications, CNYC supervisors cannot complete a thorough review of every pending application while the client is on-site. As discussed, the revised Draft of the CNYC Manual requires this pre-cursory review, but not a complete review.”

13. Consider defining an acceptable time frame between the quality assurance review and the forwarding of applications to INS. This time frame should be specified in the CNYC manual.

**DYCD Response:** “CNYC’s new manual, when completed, will specify this timeframe. In addition, CNYC is working with the Department’s Information Technology department to determine the feasibility of exception reporting for cases that are approaching this timeframe.”





**DEPARTMENT OF YOUTH AND COMMUNITY DEVELOPMENT**

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**JEANNE B. MULLGRAV**  
Commissioner

May 24, 2002

Roger D. Liwer, *Assistant Comptroller for Audits*  
Office of the NYC Comptroller  
1 Centre Street, Room 1100 North  
New York, N.Y. 10007-2341

Dear Mr. Liwer:

On Wednesday, May 15, 2002, we received the Draft Report of the Audit of the Department of Youth and Community Development's Citizenship New York City (CNYC) Program MG01-186A. To follow, please find our point by point response:

*Recommendation One:* Formalize the process of determining the citizenship status of program applicants.

✓ **Response:** As indicated during the audit, the only source from which the Department's Citizenship NYC (CNYC) initiative can gain full information about the status of its clients is the federal Immigration and Naturalization Service (INS). As documented to the Comptroller's Office, the INS has indicated to DYCD in writing that they will not share information directly with DYCD nor anyone that is not a citizenship applicant or the legal representative of a citizenship applicant. As discussed at the Exit Conference, DYCD already has begun formalized processes to determine the citizenship status of CNYC applicants. These include: a) conducting a telephone survey of applicants CNYC assisted in 1997 and 1998. DYCD found that approximately 75 percent of those contacted had already been granted citizenship by the INS to date. CNYC will continue reaching out to its former applicants to seek their current status information. b) providing applicants with pre-paid postcards to mail to CNYC upon completion of the naturalization process (to begin in July 2002). c) enhancing the computer system's capacity to alert CNYC outreach workers to attempt to make contact with clients one year after their applications have been filed with the INS. In addition, DYCD will continue to petition the federal INS to grant us formal information about clients' citizenship status.

*Recommendation Two:* Develop and report on performance indicators that set goals and then measure the actual outcome of the program (i.e. the number of applicants who become US citizens as a percentage of applications submitted to INS).

- ✓ *Response:* As was discussed at the Exit Conference, the Department already tracks controllable performance indicators for CNYC – such as the number of applications submitted to the INS. DYCD cannot control the rate at which the federal INS grants citizenship. Such an indicator is not a measurement of DYCD's performance, but of the performance of the federal government. Further, as previously discussed, the federal INS has declined to share information about whether applicants assisted by CNYC have gained citizenship. Until the time that DYCD is able to obtain this information directly from the INS, the Department will only be able to report on the number of clients that it has been able to contact one year after they have completed CNYC's services and who voluntarily share their immigration status with DYCD.

*Recommendation Three:* Ensure that staff completes all outreach efforts to each individual in its database.

- ◆ *Response:* CNYC has developed an exception report to identify clients who have not been contacted. CNYC has already begun a mailing to these clients. CNYC is working to improve the logic for assigning clients to the outreach workers to contact.

*Recommendation Four:* Ensure that the staff does not make additional contacts in cases where contact has already been completed.

- ✓ *Response:* CNYC has re-instructed staff to review the outreach screen thoroughly before calling to ensure they do not conduct additional outreach after the requisite number of attempts has been made.

*Recommendation Five:* Ensure that the CNYC Manual addresses what steps should be taken when telephone numbers are disconnected.

- ✓ *Response:* As discussed at the Exit Conference, the CNYC Manual has been under revision. This recommendation has been incorporated into the revised Draft. In addition, CNYC staff were instructed to send letters to prospective clients when they cannot be reached by telephone.

*Recommendation Six:* Ensure that the Event Listing case notes include all attempts at contact, including letters that are sent through bulk mailings.

- ✓ *Response:* The CNYC system automatically generates a notification on the information and referral screen when bulk mailings are sent to prospective

applicants. At the Comptroller's request, CNYC is working with the Information Technology Department to have this information appear as an event as well.

*Recommendation Seven:* Continue to generate exception reports to ensure that all individuals in the system are receiving necessary outreach.

✓ *Response:* DYCD will continue to generate such exception reports.

*Recommendation Eight:* Require that the staff obtain and record the risk status of walk-in applicants in the Information and Retrieval Screen.

✓ *Response:* As discussed at the Exit Conference, the definition of at-risk has changed over time for the immigrant population seeking citizenship as Congress has revised immigrants' eligibility criteria for federal benefits several times.

CNYC serves immigrants who are currently not eligible for federal benefits because they are not citizens. CNYC also serves those who may require federal benefits but will not be eligible for them because they have not yet obtained citizenship.

CNYC collects as much information as possible for walk-in clients. However, in some cases, walk-in clients are only seeking information and are not willing to divulge personal information - sometimes they are not even willing to give their real names. DYCD cannot require these individuals to provide more information than they are voluntarily willing to give.

However, for those walk-in clients who wish to complete applications for citizenship, CNYC does already collect information about risk-status.

*Recommendation Nine:* Report in the Mayor's Management Report the percentage of applications filed with the INS for individuals who were at risk. This would indicate how well CNYC is accomplishing its mission.

✓ *Response:* As stated on DYCD's website, "Citizenship NYC is a free City service that helps immigrant New York City residents to become naturalized citizens of the United States." As such, CNYC helps any New Yorker requiring assistance in completing naturalization applications. Citizenship NYC specializes in the needs of low-income, elderly, disabled, and young immigrants, helping them to apply for fee waivers, disability waivers, homebound naturalization interviews, and derivative citizenship. CNYC currently reports to the Mayor's Office on the number of applications submitted to the INS, which reflects the number of people served who need citizenship to retain or attain federal benefits eligibility.

*Recommendation Ten:* Determine whether CNYC's stated mission of preparing naturalization applications for immigrant New Yorkers who seek to become citizens in

order to retain or attain eligibility for federal benefits is still viable. If not, a revised mission statement should be promulgated.

- ✓ *Response:* CNYC currently prepares naturalization applications for immigrant New Yorkers who seek to become citizens in order to retain or attain eligibility for federal benefits. CNYC anticipates that it will continue to serve this population as well as those who may, in the near future, fall into this population. CNYC does not turn away immigrants from the services it offers.

*Recommendation Eleven:* Make sure that the CNYC database continues to maintain a visible and accessible date field that shows when individual names are entered in the system.

- ✓ *Response:* DYCD has always maintained this information automatically in the database. DYCD has recently made this information available for viewing on the information and referral screen. The CNYC system will continue to maintain this information.

*Recommendation Twelve:* Ensure that whenever possible supervisory reviews are done on the day that processing is completed, when the applicant is present, as required by CNYC protocol.

- ✓ *Response:* As discussed at the Exit Conference, the case cited in the audit that was pending for 45 days was due to the fact that the client had completed the INS application, with CNYC's assistance, prior to the time in which he was eligible for citizenship. If CNYC had submitted this application to the INS prior to the client's eligibility, the client would have forfeited his \$250 application fee to the INS and the application would have been automatically rejected; the client would have been forced to go through the entire application process a second time. Instead, CNYC worked with the client until the application was complete, and then held the application until the date at which the client was in fact eligible for citizenship. Only then did CNYC submit the application to the INS for consideration. This case was handled appropriately by CNYC.

Also, as mentioned during the audit, and as discussed at the Exit Conference, CNYC supervisors currently conduct a pre-cursory review of applications while the applicant is on-site. Due to the volume of applicants, CNYC supervisors cannot complete a thorough review of every pending application while the client is on-site. As discussed, the revised Draft of the CNYC Manual requires this pre-cursory review, but not a complete review.

*Recommendation Thirteen:* Consider defining an acceptable timeframe between the quality assurance review and the forwarding of applications to INS. This timeframe should be specified in the CNYC Manual.

May 24, 2002

✓ *Response:* CNYC's new manual, when completed, will specify this timeframe. In addition, CNYC is working with the Department's Information Technology department to determine the feasibility of exception reporting for cases that are approaching this timeframe.

DYCD would like to thank the Comptroller's Office for its continuous communication with DYCD officials throughout the course of the audit. These discussions made us aware of areas for improvement and allowed us to implement corrective action plans immediately.

Please feel free to contact me directly or the Director of Internal Review, Maggie Slane at (212) 676-8216, if you have any questions or concerns.

Sincerely,

  
Jeanne B. Mullgrav  
Commissioner

C: Michele F. Berman, *Deputy Commissioner for Administration*  
Lisette Nieves, *Chief of Staff*  
John Sharp, *Executive Director, Citizenship New York City of New York*  
Joseph Rocco, *Director, Field Operations*  
Karen Fleshman, *Director, Outreach*  
Maggie Slane, *Director, Internal Review*