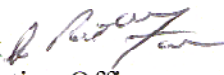





Homeland
Security

JUN 03 2008

MEMORANDUM FOR: Office of Management and Budget

THROUGH: Luke McCormack 
ICE Chief Information Officer

FROM: Richard Mangogna 
DHS Chief Information Officer

SUBJECT: Secure Communities Survey - OMB Emergency Paperwork Reduction Act (PRA) Clearance

Purpose

The purpose of the memorandum is to request OMB Emergency PRA clearance for the Secure Communities survey.

Background

The U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) is improving community safety by transforming the way the federal government cooperates with state and local law enforcement agencies to identify, detain, and remove all criminal aliens held in custody. Secure Communities (SC) will revolutionize immigration enforcement by using technology to share information between law enforcement agencies and by applying risk-based methodologies to focus resources on assisting all local communities remove high-risk criminal aliens.

To implement Secure Communities, ICE must collect detailed requirements and input from its state and local law enforcement partners. ICE will collect information from law enforcement officials at over 3,500 state and local jails across the United States as part of the Secure Communities Initiative. The collection of information is facilitated by information technology permitting electronic submissions of responses via an online survey. This survey will determine the fingerprint procedures and technological capabilities of state and local jails, governance, and basic jail booking statistics. This information will be used to prioritize and inform the implementation strategy of the Secure Communities plan.

ICE can not reasonably comply with the normal clearance procedures under 5 CFR 1320. In the FY 2008 Appropriations Bill, ICE received \$200 million provided by Congress in two-year money to spend in FY2008 and FY2009 for Secure Communities. It is already mid-year through FY08 and ICE cannot begin to deploy solutions until it receives the results of this survey. Secure Communities has a tight project schedule with tremendous departmental and Congressional pressure and without

emergency clearance may miss important deadlines to prioritize local sites and deliver a strategy for implementation.

For example, as part of Secure Communities, DHS has reached an agreement with Department of Justice (DOJ), Federal Bureau of Investigation (FBI), Criminal Justice Information System (CJIS) to begin rolling out interoperability with DHS' Automated Biometric Identification System (IDENT) in October 2008. This survey will allow ICE to identify and prioritize locations for interoperability roll-out beginning October 2008. The use of normal clearance procedures will prevent the collection of the necessary information in time to properly set-up the October 2008 interoperability roll-out.

Public harm is reasonably likely to result if normal clearance procedures are followed. If normal clearance procedures are followed, Secure Communities implementation may be delayed affecting ICE's ability to assist local communities in removing all high-risk criminal aliens.

The use of normal clearance practices is likely to disrupt the collection of key information. Without input from its state and local law enforcement partners, Secure Communities is unable to plan its implementation strategy, causing significant project delays, and affecting its ability to effectively spend its two-year money.

ICE has taken all practical steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.

Attachment