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REFUGEES AND SECURITY VETTING

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EXECUTIVE SUMMARY

Over the last two decades, security and law enforcement professionals at all levels have worked to establish, improve and utilize robust security and vetting procedures for individuals admitted as refugees to the United States. These policies and procedures have been reviewed, enhanced and strengthened repeatedly. The procedures provide adequate security for the United States to welcome refugees without fear of a terrorist attack. It is in America's national security, foreign policy and economic interests to welcome refugees and it can be done without harming national security.

This paper serves as a primer for understanding the U.S. Refugee Admissions Program, the National Security Community's Screening and Vetting Enterprise – including continual improvements over the past 20 years and explanation of “extreme vetting” – and the current risks as understood by security professionals.

Honest conversations regarding immigration and refugee policy are still undermined by misrepresentation of the security risk posed by immigrants and security officials' capabilities to mitigate risk. The premise for limiting refugee access based on security concerns – i.e., limited resources for sufficient vetting and the risk posed by refugees – caters to narratives propagated by politics and misrepresents the national vetting process and the significant work accomplished by security and law enforcement officials. “Talking points” used against refugees have played upon domestic fears by misrepresenting the security risk, failing to honestly assess the progress made in security enhancements or refusing to address the resource gaps with proper budgetary support.

The [National Vetting Center](#) was established in 2018 as a multi-agency effort to create and maintain “tools and processes” to “enable a thorough, yet efficient review of appropriate intelligence, law enforcement, and other data...in a manner that protects both sources and methods and the privacy civil rights and civil liberties of the individuals whose information is vetted.”

President Donald Trump advocated lower refugee admissions by arguing the U.S. government needed to improve security vetting for refugees. However, after the Trump administration increased security vetting for refugees, the administration reduced the annual refugee ceiling and admitted fewer refugees.

Beginning in March 2017, President Trump reduced the FY 2017 refugee ceiling from 110,000 to 50,000, then further reduced the FY 2018 ceiling to 45,000. These changes were made under the auspices that securing the country required more thorough vetting and therefore we could not process as many people.

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By early 2019, the various agencies involved in refugee security vetting had implemented the enhancements required for “extreme vetting.” While some information technology (IT) systems needed to be connected to reduce some manual and paper-based processes, officials felt confident the system worked. If a known or suspected terrorist attempted to come to the U.S. through the refugee system, they would be detected and detained. Policymakers involved in this accomplishment expected this success would unlock the restrictions placed on refugees.

However, instead of returning the refugee ceiling to traditional levels – as recommended by the Secretaries of Defense, State, and Homeland Security – the Trump administration lowered the refugee ceiling further to 30,000 in 2019 and 18,000 in 2020. When the numbers continued to be reduced, those who initially gave the Trump administration the benefit of the doubt recognized extreme vetting was not a policy designed to keep Americans safe, but rather a policy intended to keep out people.

Among the findings and information in this analysis:

- A terrorist with a malicious purpose for gaining entry into the U.S. would most likely choose a different path than refugee for access to the United States because the screening and vetting process for the refugee program is more rigorous than any other method of gaining entry to the United States and the Refugee Admissions Process takes a long time – in 2018 the Resettlement Support Center (RSC) conducted interviews for people that had begun the process in 2009.
- Jennifer Arangio, who served on the Trump campaign before becoming a National Security Council (NSC) Senior Director with responsibilities for facilitating the refugee ceiling discussion, said, “I did used to think that the refugee program was vulnerable to terrorist infiltration. But then I got here and made it my business to learn the facts about the program, and now I know that refugees are the most vetted category of any immigrant. *You’d be crazy to come if you were a terrorist. This is the last way you would try to get into this country.*”
- The vetting process seeks to answer three key questions before someone can enter the United States: 1) Is the applicant who they claim to be?; 2) Is the applicant eligible for the immigration benefit they seek?; 3) Do they pose a national security or public safety threat to the United States? In the context of the U.S. Refugee Admissions Program, each question is asked multiple times, by a variety of agencies, throughout the process. USCIS Refugee Officers play a primary role in the vetting process, conducting in-depth interviews evaluating each applicant against the questions discussed above.

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- When a refugee has been referred to the United States for resettlement, the [Resettlement Support Center](#) (RSC) leverages the information collected by the United Nations High Commissioner for Refugees (UNHCR), undertakes pre-screening interviews and starts biographic checks. USCIS then facilitates a number of biometric and biographic checks comparing the applicant's information against U.S. government data. The USCIS Refugee Officer utilizes the information from these checks to structure interviews designed to determine if the individual is telling the truth about their identity, determine eligibility, and discern if any nefarious intent is present.
- USCIS Refugee Officers receive in-depth training to prepare them for their vetting duties. USCIS Refugee Officers receive five additional weeks of “specialized training that includes comprehensive instruction on all aspects of the job, including refugee law, grounds of inadmissibility, fraud detection and prevention, security protocols, interviewing techniques, credibility analysis, and country conditions research.” Before deploying overseas for interviews, officers learn to develop “lines of questioning to elicit information” regarding eligibility and potential security concerns relevant to the applicant’s home country. Preparation includes briefings from “outside experts from the intelligence, policy, and academic communities,” and deep investigations into timelines, country conditions and details of events that occurred in the applicant’s home country.
- If approved by USCIS, the State Department facilitates travel and additional biographic and biometrics checks are conducted by the Transportation Security Agency (TSA) and Customs and Border Protection (CBP) to board the flight and at the Port of Entry. After all of these steps, they can be admitted as a refugee.
- We should continue to strengthen and review vetting procedures and the U.S. Refugee Admissions Program (USRAP). Government programs are designed and executed by well-intentioned but imperfect individuals, usually woefully under-resourced. U.S. Citizenship and Immigration Services (USCIS) should complete the technological overhaul currently underway and move from a paper-based system to an electronic system seamlessly interconnected with the vetting process.
- The National Vetting Center needs to be properly funded, the National Vetting Enterprise fully staffed and implementation expedited. The National Counterterrorism Center needs additional resources to keep up with the expanding volume of data discovered about known and suspected terrorists. All of these require resources – time, funding, and personnel – and advocacy and accountability from all sides to ensure success.

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- A number of studies demonstrate admitting refugees does not increase the likelihood of terrorist attacks. A study published by the University of Chicago's *The Journal of Politics*, concluded that "in developed countries, refugee stocks do not constitute a Trojan horse that imports terrorism, nor do they boost homegrown terrorism."
- A study published in 2019 by the Cato Institute examined terrorists who conducted attacks in the United States from 1975-2017 by immigration status and nationality and found the chance of a person perishing in a terrorist attack on U.S. soil committed by a refugee was 1 in 2.86 billion per year.
- Evaluation and discussion of refugee policies cannot be predicated on zero-risk expectations or tolerance. If the goal of policymakers is to reduce the threat of terrorism, the data indicate we should be more focused on strengthening the vetting of tourists and business visitors.

Welcoming refugees is a small but critical part in addressing the broader set of factors underlying the global migration challenge. We need to have conversations about how to address the growing number of displaced persons in the world.

As studies demonstrate and national security professionals have testified, refugees can be admitted safely. It is time to shift the policy discussion to develop solutions to the remaining complex challenges. This requires honest dialogue, constructive conversations and sound policy crafted by principled arbitrators from all sides.

The security-based arguments against refugee admissions have not been made in good faith to improve policy. Policy conversation must focus on the actual security challenges. Thoughtful leadership requires professionals and policymakers willing to assess risk, mitigate security concerns and care for humanity.

INTRODUCTION

Every year since the early 1980s, executive branch officials determine the number of refugees admitted into the United States the following year by evaluating various factors, including humanitarian need, national interest and operational capacity.¹

Although the refugee admissions process historically has been considered bureaucratic and uncontroversial, the narrative surrounding refugee admissions changed dramatically during the 2016 presidential election. Political candidates began aggressively linking immigration policies to crime trends and suggested refugees and immigrants posed a greater risk of terrorism. Therefore, these voices argued, closing America's borders and reducing refugee access would be paramount to ensuring America's security.

While many of these assertions against immigrants and refugees could be easily debunked,^{2,3,4} certain elements of these arguments persist, largely due to a thin veneer of security justification. Honest conversations regarding immigration and refugee policy are still undermined by misrepresentation of the security risk posed by immigrants and security officials' capabilities to mitigate risk.

For the past six years, former President Trump, a small group of ideologues, and a growing number of politicians and media personalities have normalized the narratives calling refugees and immigrants criminals and terrorists. "Talking points" used against refugees have played upon domestic fears by misrepresenting the security risk, failing to honestly assess the progress made in security enhancements or refusing to address the resource gaps with proper budgetary support.

In addition to these narratives, addressing immigration and refugee policy has been further complicated by Covid-19 and the crisis in Afghanistan following America's withdrawal. Both issues elicit strong emotions across the proverbial aisle and have been used to further fear narratives. As a result, it is increasingly difficult to have a rational, fact-based conversation about the refugee program.

¹ <https://www.uscis.gov/humanitarian/refugees-and-asylum/usrap>.

² For example, statistics show that refugees commit crimes in far fewer numbers than people born in the United States. According to a RAND study, "overwhelmingly, most persons indicted on terrorism charges or who have become jihadist terrorists since 9/11 are U.S. citizens."

³ "Is There a Link Between Refugees and U.S. Crime Rates?," New American Economy (New American Economy Research Fund, February 7, 2017), <https://research.newamericaneconomy.org/report/is-there-a-link-between-refugees-and-u-s-crime-rates/>.

⁴ https://www.rand.org/content/dam/rand/pubs/research_reports/RR2500/RR2545/RAND_RR2545.pdf.

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Sound policy deserves to be grounded in fact, and honest dialogue requires truth, not myths. To that end, this paper addresses the security concerns often raised by advocates for closing the borders and nearly eliminating refugee admissions. What follows should serve as a primer for understanding the U.S. Refugee Admissions Program, the National Security Community's Screening and Vetting Enterprise – including continual improvements over the past 20 years and explanation of “extreme vetting” – and the current risks as understood by security professionals.⁵ It is based on more than two decades of experience as a security professional as well as my recent service as the DHS senior official responsible for overseeing the “extreme vetting” enhancements to our refugee system and as the chair of the Federal Government's National Vetting Governance Board.

The premise for limiting refugee access based on security concerns – i.e., limited resources for sufficient vetting and the risk posed by refugees – not only caters to narratives propagated by politics but also misrepresents the national vetting process and the significant work accomplished by security and law enforcement officials. By establishing a common understanding of the vetting process, the security enhancements, as well as the ongoing challenges, we can have more constructive conversations regarding refugee policy.

OVERVIEW OF THE U.S. REFUGEE ADMISSION PROGRAM

The overarching law governing immigration, including the refugee admission program, the [Immigration and Nationality Act \(INA\)](#), is considered one of the most complex parts of federal law. The security vetting required for immigrants and refugees – as authorized by other parts of the U.S. Code – further complicates immigration law.

In the 20 years since 9/11, the United States has established numerous programs and policies for the Departments of Homeland Security and State to screen and vet individuals applying for immigration benefits.⁶⁷ These programs are multi-agency in nature, leveraging law enforcement and intelligence capabilities to detect individuals that pose

⁵ This paper does not address the emergency evacuation of Afghans in August 2021. Some of the processes described in this paper were leveraged to screen and vet Afghans prior to being admitted to the United States - particularly the descriptions of biometric and biographic vetting outlined in section II. Notably, not all arriving Afghans are arriving as “refugees.” According to the [Migration Policy Institute](#), Afghans were admitted under one of four categories: 1) [Special Immigrant Visa \(SIV\) recipients](#). These visa holders worked for the U.S. government or government contractors in Afghanistan for at least a year; the visas also cover their immediate families. 2) [Refugees](#). They include those who worked for the U.S. government or government contractors for less than a year in Afghanistan, who worked for U.S.-funded programs or projects or were employed by a U.S.-based media organization or NGO. Spouses and children also are covered. 3) [SQ/SI parolees](#). These are individuals with pending applications for SIV status. 4) [Humanitarian parolees](#). This final category is for Afghans who do not have SQ/SI status and who will likely be seeking asylum in the United States.

⁶ DHS's [U.S. Citizenship and Immigration Services](#) and the State Department's [Office of Consular Affairs](#) are responsible for administering most immigration benefits.

⁷ Immigration Benefits - a broad term which encompasses granting the legal right for an individual to stay in the U.S. on a temporary or permanent basis. This includes immigrant and non-immigrant visas - for example, permanent residence (green cards), business travel or tourist travel, student visas, seasonal worker; as well as humanitarian admissions (asylum or refugee status) and employment authorizations.

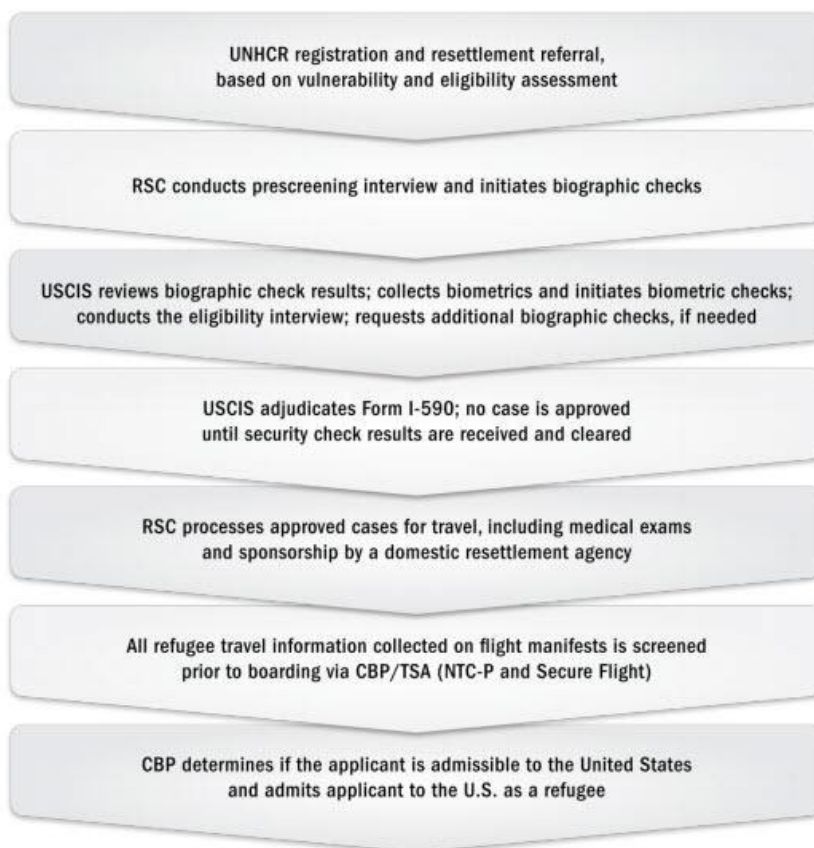
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a national security or public safety risk. The vetting overview in this paper simplifies the complex process, and certain details and nuances are avoided for the sake of clarity.

The U.S. Refugee Admissions Program (USRAP) involves multiple steps and multiple government agencies, international organizations and non-governmental organizational partners. The State Department coordinates the overall program, while USCIS is responsible for adjudicating the application for refugee resettlement, either approving or denying the case. Figure 1 provides an overview of the key steps in the process and those responsible for carrying out the steps in the admissions process.

Figure 1 - USCIS' General Refugee Process Diagram⁸

General Refugee Process



⁸https://www.uscis.gov/sites/default/files/document/fact-sheets/Refugee_Screening_and_Vetting_Fact_Sheet.pdf. See General Refugee Process Tab: <https://www.uscis.gov/humanitarian/refugees-and-asylum/refugees/refugee-processing-and-security-screening>.

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The Resettlement Support Center (RSC) for the Middle East and North Africa, operated by the [International Organization for Migration](#) (IOM) – a UN organization contracted by the State Department to support resettlement - created this [video overview](#) of the steps in the U.S. Refugee Admissions Program.

THREE KEY VETTING QUESTIONS

For our purposes, we are primarily interested in security vetting procedures. The vetting process seeks to answer three key questions before someone can enter the United States:

1. Is the applicant who they claim to be?
2. Is the applicant eligible for the immigration benefit they seek?
3. Do they pose a national security or public safety threat to the United States?

In the context of the U.S. Refugee Admissions Program, each question is asked multiple times, by a variety of agencies, throughout the process. (For detailed information about the overall process of admitting refugees, see this [fact sheet](#).)

1. Verifying Identity

For non-refugee applicants, this step occurs at their nearest U.S. Embassy by Consular Affairs officers. The applicant provides official documentation from their home country, which verifies their biographical information, i.e., full name, date of birth, place of birth, nationality, current address. This can often be done by providing a passport, birth certificate, driver's license or other official document. More developed countries may have arrangements with the United States to allow the federal government to compare an applicant's biometric information with biometric information collected by the home country as part of passport issuance.

Verifying identity for refugees can be more challenging than general immigration applicants. Often these individuals escaped dangerous circumstances with little to no warning and were unable to bring identifying documents with them, or such documents were destroyed during a conflict or to avoid being identified as a part of a persecuted group.

Under the [1951 Refugee Convention](#) and the 1967 Protocol, when an individual is initially applying for refugee status (Step 1, Fig. 1), the host country or [UN Refugee Agency](#) (UNHCR) are required to issue new identification documents enabling them to legally reside in the host country while they await resettlement or repatriation (should conditions allow).⁹ Steps are taken to attempt to verify biographic identity when they register the individual as a

⁹ See p. 62 of *Refugee Protection: A Guide to International Refugee Law* <https://www.unhcr.org/en-us/publications/legal/3d4aba564/refugee-protection-guide-international-refugee-law-handbook-parliamentarians.html>.

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refugee. Critically, UNHCR also collects biometric data: facial, fingerprint, and/or iris, to be able to provide future verification of identity.¹⁰

When a refugee has been referred to the United States for resettlement, the [Resettlement Support Center](#) (RSC) leverages the information collected by UNHCR, undertakes pre-screening interviews and starts biographic checks (Step 2, Fig. 1). USCIS then facilitates a number of biometric and biographic checks comparing the applicant's information against U.S. government data. The USCIS Refugee Officer utilizes the information from these checks to structure interviews designed to determine if the individual is telling the truth about their identity, determine eligibility, and discern if any nefarious intent is present. (More on these latter two points in the next sections). (Step 3, Fig. 1).

If approved by USCIS, the State Department facilitates travel (Step 5, Fig. 1) and additional biographic and biometrics checks are conducted by the Transportation Security Agency (TSA) and Customs and Border Protection (CBP) to board the flight and at the Port of Entry (Steps 6 and 7, Fig 1). After all of these steps, they can be admitted as a refugee.

2. Is the applicant eligible for the immigration benefit they seek?

There are multiple aspects to consider for eligibility, many are outside traditional security concerns, including whether the individual meets the definition of a refugee and is not firmly resettled in another third country.¹¹ USCIS also evaluates factors in an applicant's background rendering them inadmissible under U.S. law, such as whether the applicant has participated in the persecution of others, terrorist activity, or criminal activity. Regardless of whether those actions pose a direct threat to the national security or public safety of the United States, the individual is ineligible for refugee status in the United States.

3. Does the applicant pose a national security or public safety threat to the United States?

This question is the primary purpose behind the U.S. Government's national vetting enterprise.

In the context of a refugee applicant, "national security concerns exist when a person or organization has been determined to have a link to past, current, or planned involvement in an activity or organization involved in terrorism, espionage, sabotage, or the illegal transfer of goods, technology, or sensitive information."¹²

¹⁰ See UNHCR's Guidance on Registration and Identity Management for refugees: <https://www.unhcr.org/registration-guidance/chapter1/introduction-to-the-guidance-on-registration/>.

¹¹ <https://www.uscis.gov/humanitarian/refugees-and-asylum/refugee-eligibility-determination>.

¹² See USCIS National Security Processing tab <https://www.uscis.gov/humanitarian/refugees-and-asylum/refugees/refugee-processing-and-security-screening>.

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Usually, a concern is detected when an applicant's biographic and biometric data are provided to national security agencies for checks. Though it could also come from the interview process or testimony from other associates of the applicant. Any available information in U.S. government databases is provided to USCIS and investigated further by the [Fraud Detection and National Security Directorate](#). This may include providing the interviewing officers additional case-specific information that could help inform lines of inquiry for the interview. Regardless of where the derogatory information originates, USCIS remains the adjudicating agency, responsible for determining admissibility.

Consequently, USCIS Refugee Officers play a primary role in the vetting process, conducting in-depth interviews evaluating each applicant against the questions discussed above. While applicants through other immigration avenues appear before a State Department Consular Affairs Officer for an interview, those interviews tend to be shorter and less tailored to the individual applicant. The procedures for refugee admissions recognize verifying identity through traditional means (passports or birth certificates) may be impossible, therefore more scrutiny is provided in the refugee interview process to address all three questions in detail.

USCIS Refugee Officers receive in-depth training to prepare them for their vetting duties. According to former USCIS Director Leon Rodriguez, USCIS Refugee Officers receive five additional weeks of “specialized training that includes comprehensive instruction on all aspects of the job, including refugee law, grounds of inadmissibility, fraud detection and prevention, security protocols, interviewing techniques, credibility analysis, and country conditions research.”¹³ Further, before deploying overseas for interviews, officers learn to develop “lines of questioning to elicit information” regarding eligibility and potential security concerns relevant to the applicant’s home country.¹⁴ Preparation includes briefings from “outside experts from the intelligence, policy, and academic communities,” and deep investigations into timelines, country conditions and details of events that occurred in the applicant’s home country.¹⁵ This enables the Refugee Officer to evaluate the applicant’s claims in context, e.g., where they are from, their reason for fleeing, their journey out of their country, and helps to “identify any possible grounds of ineligibility” such as fraud, crime or national security issues.”¹⁶

¹³ House Committee on Homeland Security Hearing. February 3, 2016. Crisis of Confidence: Preventing Terrorist Infiltration Through U.S. Refugee and Visa Programs. Testimony of USCIS Director, Leon Rodriguez. <https://www.govinfo.gov/content/pkg/CHRG-114hrg21522/html/CHRG-114hrg21522.htm>.

¹⁴ See USRAP Screening Tab, USCIS Interview <https://www.uscis.gov/humanitarian/refugees-and-asylum/refugees/refugee-processing-and-security-screening>

¹⁵ House Committee on Homeland Security Hearing. February 3, 2016. Crisis of Confidence: Preventing Terrorist Infiltration Through U.S. Refugee and Visa Programs. Testimony of USCIS Director, Leon Rodriguez. <https://www.govinfo.gov/content/pkg/CHRG-114hrg21522/html/CHRG-114hrg21522.htm>.

¹⁶ Ibid.

“YOU’D BE CRAZY TO COME IF YOU WERE A TERRORIST”

In 2018, I traveled to Cairo with experts from USCIS’ Refugee Affairs Division and DHS’ Screening and Vetting Policy team to observe the lengthy process a refugee undertakes to be admitted into the United States. I observed how the UNHCR evaluates displaced persons to determine an individual’s identity and eligibility for the refugee program. I spent several hours at the RSC, managed by the International Organization for Migration, a contractor of the U.S. State Department, which helps facilitate the [multi-step process](#) a potential refugee goes through to come to the United States.

Among the many functions the Resettlement Support Center performs, it hosts USCIS’ Refugee Officers and refugee applicants for in-person interviews to determine eligibility for admission into the United States. I observed several of these in-depth interviews, surprised by the rigor and depth the Officers approached their task. While the bulk of national security vetting occurs in Washington, DC, these in-person interviews serve as an important, earlier opportunity to detect information not yet in intelligence and law enforcement databases.

Further, this experience offered a clear picture of the disparity between the growing calls for “extreme vetting” of refugees and the on-the-ground reality. A terrorist with a malicious purpose for gaining entry into the U.S. would most likely choose a different path for access to the United States because the screening and vetting process for the refugee program is more rigorous than any other method of gaining entry to the United States and the Refugee Admissions Process takes a long time long – in 2018 the Resettlement Support Center conducted interviews for people that had begun the process in 2009.

This is a common conclusion, shared by Jennifer Arangio, who served on the Trump campaign before becoming a National Security Council (NSC) Senior Director with responsibilities for facilitating the refugee ceiling discussion.¹⁷ She stated:

Yeah, I did used to think that the refugee program was vulnerable to terrorist infiltration. But then I got here and made it my business to learn the facts about the program, and now I know that refugees are the most vetted category of any immigrant. *You’d be crazy to come if you were a terrorist. This is the last way you would try to get into this country.*¹⁸

¹⁷ <https://www.politico.com/story/2018/07/13/national-security-council-jennifer-arangio-ousted-719691>.

¹⁸ Julie Hirschfeld Davis and Michael D. Shear, *Border Wars: Inside Trump’s Assault on Immigration*. Simon & Schuster: New York, 2020.

II. NATIONAL VETTING ENTERPRISE: CONTINUAL IMPROVEMENT FOR 20 YEARS

Following the attacks of September 11, 2001, the national security community prioritized preventing terrorists from entering the United States. Homeland security officials refer to this as “pushing the borders out” and establishing a “layered defense strategy.”

Pre-9/11, multiple agencies compiled “watchlists” for their own operational purposes but did not share watchlists with others. As a result, there was not an effective way to compare notes on individuals identified as potentially being a public safety or national security threat. While there are numerous enhancements¹⁹ in screening and vetting over the past 20 years, one of the most significant for purposes of refugee vetting is the establishment of the *National Counterterrorism Center*, which “serves as the primary organization...for analyzing and integrating all intelligence possessed or acquired by the U.S. Government pertaining to terrorism.”²⁰ NCTC manages the *Terrorist Identities Datamart Environment (TIDE)*,²¹ the “central *classified* repository for all known or suspected international terrorists and their networks of contacts and support.”²² The identity records include any data known about the individual - including “biographic information, such as names and dates of birth; biometric information, such as photos; and derogatory information explaining a subject’s link to terrorism.”²³ TIDE is the core collection of information the U.S. Government has on known and suspected terrorists and their associates.

Most screening and law enforcement agencies, especially those on the frontline, operate at an unclassified level. One of the important lessons learned from the 9/11 attacks is to ensure relevant information, collected by the intelligence community and held in classified systems with limited access, is passed to the agencies with screening and law enforcement responsibilities which could encounter a known or suspected terrorist. The initial mechanism created in 2003 to ensure officials “connected the dots” is the multi-agency *Terrorist Screening Center (TSC)* which manages the Terrorist Screening Database (TSDB), commonly referred to as “the watchlist.” The TSDB contains a small subset of sensitive but *unclassified* identity information - designed to help agencies with screening and law enforcement responsibilities.²⁴ The TSC acts as a bridge between the classified information held in TIDE and screening agencies operating in unclassified settings.²⁵

¹⁹ Not mentioned in this paper: Vetting programs of DHS’ CBP, TSA, and ICE, State’s Consular Affairs, FBI, and Department of Defense (DOD) that is responsible for U.S. government personnel security vetting, as well as vetting for access to military installations.

²⁰ <https://www.dni.gov/index.php/nctc-how-we-work/overview>.

²¹ For more on TIDE, see Fact Sheet: https://www.dni.gov/files/Tide_Fact_Sheet.pdf.

²² Ibid. Underlined and italicized added by author for comparison.

²³ Ibid. Underlined and italicized added by author for comparison.

²⁴ <https://www.fbi.gov/file-repository/terrorist-screening-center-frequently-asked-questions.pdf/view>.

²⁵ <https://www.fbi.gov/file-repository/terrorist-screening-center-frequently-asked-questions.pdf/view>.

A CHRISTMAS DAY RECKONING

As with many systems created in the early years following 9/11, experience and failures have led to strengthening the TIDE and TSC. One such example occurred on Christmas Day 2009. A Nigerian man who conspired with al Qaeda detonated a bomb on an international flight on descent into Detroit.²⁶ Thankfully, the bomb was not potent enough to take down the aircraft and only two people were injured besides the bomber.

Despite the intelligence community having received two separate pieces of derogatory information in the two months prior to the attack, the bomber, Umar Farouk Abdulmutallab, was not watchlisted. More specifically, he had a record in TIDE, the *classified* database at NCTC, but his identity information “was not passed to the TSC for watchlisting” due to not having enough information to meet the criteria for “reasonable suspicion.”²⁷

A few months later, Russ Travers, then the Deputy Director for Information Sharing and Knowledge Development at the NCTC with primary responsibility for TIDE, testified before the Congress on the failure to detect Abdulmutallab. He explained that for information to be passed from TIDE to the TSC, the information was evaluated to determine if it met a “reasonable suspicion” standard - which is a legal standard used in criminal matters.²⁸ In the fall of 2008, the National Security Council Deputies’ Committee approved criteria for “reasonable suspicion” and set the “minimum amount of derogatory information” necessary to put someone on the watchlist.²⁹ Specifically, they asserted that “individuals described as militants, extremists, jihadists, etc. should not be nominated without particularized derogatory information” and “those who only associate with known or suspected terrorists, but have done nothing to support terrorism” are ineligible for the No Fly List (NFL) or Selectee List (SL).³⁰

Mr. Travers concluded his testimony by highlighting the watchlisting architecture was “fundamentally sound” and the attack did not arise from an information sharing issue but rather as a result of dots not being connected quickly enough. He recommended the government should review its reasonable suspicion criteria for watchlists and do better “piec[ing] together partial, fragmentary information from multiple collectors.” Travers noted this challenge is “complicated” and requires more “analysts and the use of technology to correlate vast amounts of information housed in multiple agencies and systems.”

²⁶ <https://archives.fbi.gov/archives/detroit/press-releases/2011/underwear-bomber-umar-farouk-abdulmutallab-pleads-guilty>.

²⁷ https://www.dni.gov/files/documents/Newsroom/Testimonies/20100324_testimony.pdf.

²⁸ https://www.law.cornell.edu/wex/reasonable_suspicion.

²⁹ https://www.dni.gov/files/documents/Newsroom/Testimonies/20100324_testimony.pdf.

³⁰ Ibid.

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In the immediate aftermath of the Christmas Day bombing, President Obama directed a review of the watchlisting system.³¹ The details of changes remain at classified or sensitive but unclassified levels, but some of the results can be seen in data that has been released since. In 2013, NBC News reported, “TIDE grew from 740,000 names in 2011 to 875,000 in 2012 – an 18 percent jump. The TSDB, for its part, jumped 23 percent from 423,000 individuals in May 2010 to 520,000 in October 2012, according to the CRS and the Terrorism Screening Center.”³² In court filings from 2021, the TSDB contains more than one million records.³³

Based on these increases, it appears Mr. Travers’ recommendation to review the reasonable suspicion criteria for watchlists occurred. The second recommendation – to leverage technology and utilize more analysts to “correlate vast amounts of information” from across the government – was made more difficult by this voluminous increase in nominations to TIDE.

ISIS AND “HOMEGROWN VIOLENT EXTREMISM”

In the latter part of the Obama administration, the threat from al Qaeda diminished and ISIS entered the world stage. By 2015-2016, attacks occurring in Europe and the U.S. came from individuals inspired but not directed by ISIS. ISIS mastered social media – radicalizing, recruiting, and training virtually – and encouraged a “bring-your-own-weapon” approach to terrorism. The counterterrorism community labels these homegrown violent extremists (HVEs). The San Bernardino attack in December 2015, and the Pulse Nightclub attack in Orlando, June 2016, are two of the most well-known and deadly examples of HVEs in the United States.

These dramatic events, combined with the horrific scenes of ISIS beheadings and desperate people fleeing Syria covered the front pages of U.S. newspapers, providing ample opportunities for speculation and fearmongering during an election year. In response to the San Bernardino attack, candidate Donald Trump promised to establish a ban on Muslims from entering the U.S. and renewed those calls after the Pulse Nightclub attack. His rhetoric was quickly condemned by Republicans and Democrats, but nonetheless planted a seed of suspicion for significant portions of the country to believe “outsiders” make America less safe.

³¹ <https://obamawhitehouse.archives.gov/blog/2009/12/29/president-preliminary-findings-regarding-attempted-terrorist-attack>.

³² <https://www.nbcnews.com/news/investigations/too-much-terrorism-data-connecting-dots-may-be-getting-harder-flna6c10044619>.

³³ <https://www.lawfareblog.com/case-summary-fourth-circuit-upholds-terrorism-watchlist-database>.

II. “EXTREME VETTING”

Among his first actions in office, former President Trump issued Executive Order [13780](#)³⁴ designed to “Protect the Nation from Foreign Terrorist Entry into the United States.” Among its numerous provisions, the executive order temporarily suspended entry for individuals from certain countries designated as posing a national security threat to the U.S. - commonly known as the “Muslim ban” because the countries listed in the initial order were Muslim-majority countries. The order also temporarily suspended the refugee program pending a review. The primary argument was strengthening security vetting necessitated a reduced number of entrants.

Experts in the vetting community believed the “travel ban” rhetoric and concept were misguided. The attacks and plots cited as reasons for reducing immigration were actually carried out either by U.S. citizens, radicalized in the United States or by individuals who immigrated to the U.S. prior to the vetting enhancements made following the 2009 Christmas Day attack. Though critical of the explanation, career national security professionals agreed more improvements were necessary. Many expressed concern about the dramatic increases in refugee admissions during the last year of the Obama Administration. Some argued the push to increase refugee numbers as a response to the crisis in Syria had overwhelmed the U.S. Refugee Admissions Program, which still needed technological modernization and increased staff. Therefore, when then-President Trump directed extreme vetting and reduced refugee access, the security community regarded the decision as disingenuous rhetoric, but also an opportunity to continue improvements to vetting that began during the Bush and Obama Administrations, and were called for by the 9/11 Commission’s Recommendations.

U.S. REFUGEE ADMISSION PROGRAM REVIEW

In response to Executive Order 13780, issued by President Trump in March 2017, refugee admissions were temporarily suspended while a review was undertaken to strengthen vetting. As documented in this [October 2017 response](#) to the President, the Secretaries of State and Homeland Security and the Director of National Intelligence asserted to the President that “the improvements to the USRAP vetting process...are generally adequate to ensure the security and welfare of the United States.”³⁵ Additional reviews of procedures continued for countries requiring Security Advisory Opinions (SAO) – a process in place well before the Trump Administration. A [report](#) of the enhancements and a detailed description of the screening process, including the biometric and biographic checks used for the U.S. Refugee Admissions Program, were issued in June 2020 by USCIS. (For brevity’s sake, not all of

³⁴ The initial Order, EO 13769, was enjoined by the courts. E.O. 13780 was a reissuance to address the legal challenges identified in the original order. It was subsequently upheld by the courts as being within the President’s authorities. The order was rescinded by President Biden in January 2021.

³⁵ See page 1, https://www.dhs.gov/sites/default/files/publications/17_1023_S1_Refugee-Admissions-Program.pdf.

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the information contained in this [7-page Fact Sheet](#) is included, but readers interested in the details of the process should review the document.)

NATIONAL VETTING CENTER

The [National Vetting Center](#) was established in 2018 as a multi-agency effort to create and maintain “tools and processes” to “enable a thorough, yet efficient review of appropriate intelligence, law enforcement, and other data...in a manner that protects both sources and methods and the privacy civil rights and civil liberties of the individuals whose information is vetted.”³⁶

At the time of its establishment, security vetting relied on processes and procedures “designed for single uses that only leverage portions of potentially relevant data.” Further these procedures were heavily dependent upon a human analyst physically checking multiple different databases, “[using] separate technical interfaces that are not scalable or adaptable to meet ever-evolving threats.”³⁷

Rather than relying on disjointed processes across multiple agencies, the NVC allows the agency with responsibility for adjudicating the immigration benefit (for refugees, USCIS) to have a centralized process to determine if any U.S. Government agency holds classified information relevant to the individual being considered for admission into the U.S.³⁸

NVC is not creating or consolidating new information or databases – but rather streamlining and managing the process by which agencies with vetting responsibilities can more easily discover information within classified U.S. Government holdings so that “immigration and border security decisions are fully informed and accurately implemented by adjudicators consistent with existing authorities.” The NVC is a “facilitator or service provider for the NVC process and technology used for vetting.”³⁹

The National Vetting Center became operational in December 2018. So far, one vetting program has been incorporated into NVC processes: CBP’s [Electronic System for Travel Authorization \(ESTA\)](#) - the mechanism by which citizens in Visa Waiver countries use to visit the United States.⁴⁰ Recent statements by NVC officials to

³⁶ National Security Presidential Memorandum-9 (NSPM-9), “*Optimizing the Use of Federal Government Information in Support of the National Vetting Enterprise*,” issued February 2018, called for the establishment of a National Vetting Center and an interagency governance board to oversee the national vetting enterprise. Though NSPM-9 was not made public, DHS released a redacted, unclassified version of the August 2018 National Vetting Center’s Implementation Plan. See <https://www.dhs.gov/sites/default/files/publications/NSPM-9%20Implementation%20Plan.pdf>.

³⁷ Pg 5, <https://www.dhs.gov/sites/default/files/publications/NSPM-9%20Implementation%20Plan.pdf>

³⁸ <https://www.afcea.org/content/new-vetting-center-flipping-script-watchlisting>.

³⁹ Pg 3, Privacy Impact Assessment of the National Vetting Center, December 2018. DHS/ALL/PIA-072.

<https://www.dhs.gov/sites/default/files/publications/privacy-pia-dhsall072-nvc-october2021.pdf>.

⁴⁰ <https://www.cbp.gov/border-security/ports-entry/national-vetting-center>.

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refugee-related NGOs, indicate that refugees will be incorporated into the NVC in 2022. This is good news for refugee applicants. The NVC will enable security checks to be streamlined, better coordinating multiple vetting requests across multiple agencies. It will reduce the time USCIS would have to wait for a result, enabling vetting responses to be provided back in minutes instead of months or years. Integrating the NVC into the Refugee Process strengthens security, as it will allow for greater thoroughness in checking government holdings beyond terrorism, including screening for potential ties to transnational organized crime, proliferation of weapons of mass destruction, or espionage.⁴¹

IMPLEMENTATION OF “EXTREME VETTING” = REDUCED REFUGEE CEILINGS

Beginning in March 2017, President Trump reduced the FY 2017 refugee ceiling from 110,000 to 50,000,⁴² then further reduced the FY 2018 ceiling to 45,000.⁴³ These changes were made under the auspices that securing the country required more thorough vetting and therefore we could not process as many people.

By early 2019, the various agencies involved in refugee security vetting had implemented the enhancements required for “extreme vetting.” While some IT systems needed to be connected to reduce some manual and paper-based processes, officials felt confident the system worked. If a Known or Suspected Terrorist attempted to come to the U.S. through the refugee system, they would be detected and detained. Policymakers involved in this accomplishment expected this success would unlock the restrictions placed on refugees.

However, instead of returning the refugee ceiling to traditional levels – as recommended by the Secretaries of Defense, State, and Homeland Security – the Trump Administration continued to reduce the refugee ceiling to 30,000 in 2019 and 18,000 in 2020.⁴⁴ (Notably, these historically low numbers were set prior to the COVID-19 worldwide pandemic. The 2020 ceiling was announced on November 1, 2019.) When the numbers continued to be reduced, those who initially gave the Trump administration the benefit of the doubt – and I include myself – recognized extreme vetting was not a policy designed to keep Americans safe, but rather a policy intended to keep out people, including from certain nationalities.

⁴¹ These threat actor categories are a sample of those outlined in NSPM-7. See footnote 5 on page 6 of the Implementation Plan. <https://www.dhs.gov/sites/default/files/publications/NSPM-9%20Implementation%20Plan.pdf>.

⁴² President Obama set the FY 2017 Ceiling in September 2016 at 110,000. President Trump updated that number in March 2017, reducing it to 50,000. See: <https://obamawhitehouse.archives.gov/the-press-office/2016/09/28/presidential-determination-refugee-admissions-fiscal-year-2017> and <https://www.federalregister.gov/documents/2017/03/09/2017-04837/protecting-the-nation-from-foreign-terrorist-entry-into-the-united-states>.

⁴³ <https://www.migrationpolicy.org/programs/data-hub/charts/us-annual-refugee-resettlement-ceilings-and-number-refugees-admitted-united>.

⁴⁴ Ibid.

CONCLUSION

Over the last two decades, security and law enforcement professionals at all levels have worked to establish and utilize robust security and vetting procedures for individuals admitted as refugees to the United States. As detailed above, these policies and procedures have been reviewed, enhanced, and strengthened repeatedly. As a security professional, I believe these procedures provide adequate security for the United States to welcome refugees without fear of a terrorist attack.

This is not to suggest there is zero risk. Living in an open, democratic society brings risk. Even with the best intelligence collection on earth, even if the system has no gaps, and even if technology has empowered near real-time recurrent electronic vetting, security is still limited by what former Secretary of Defense Rumsfeld called the “unknown unknowns.” The vetting system is not omniscient. Nor can it predict who may be radicalized in the future. Therefore, while it is important for the vetting system to thoroughly vet those who come to the United States, it would be foolish to expect doing so reduces the risk to zero. Thus, evaluation and discussion of refugee policies cannot be predicated on zero-risk expectations or tolerance.

Further, a number of studies demonstrate admitting refugees does not increase the likelihood of terrorist attacks. One study, published by the University of Chicago’s *The Journal of Politics*, assessed whether refugee admissions serve as a “Trojan Horse” – language used by candidate Donald Trump in 2015 to argue the United States should not admit Syrian refugees.⁴⁵ Professors Polo and Wucherpfennig conclude that “in developed countries, refugee stocks do not constitute a Trojan horse that imports terrorism, nor do they boost homegrown terrorism.”⁴⁶

The same research also examined whether fearmongering contributed to attacks on refugees in their new host countries and concluded, “Inflation of the refugee-terrorism link through (social) media, politicians, and public authorities unsettles the public needlessly; stir[ing] hostility against refugees and migrants for electoral purposes...may generate major unintended consequences and trigger more terrorism” against the refugees.”⁴⁷

⁴⁵ <https://www.cnn.com/2015/11/16/politics/donald-trump-syrian-refugees/index.html>.

⁴⁶ Polo, S. M., & Wucherpfennig, J. (2021). Trojan horse, copycat, or scapegoat? unpacking the refugees-terrorism nexus. *The Journal of Politics*, volume 84, number 1, January 2022. <https://doi.org/10.1086/714926>. Published by The University of Chicago Press for the Southern Political Science Association.

⁴⁷ Ibid.

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A study published in 2019 by the Cato Institute examined terrorists who conducted attacks in the United States from 1975-2017 by immigration status and nationality. Over the 43-year period studied,⁴⁸ they found the chance of a person perishing in a terrorist attack on U.S. soil committed by:

- A tourist / B visa: about 1 in 4.1 million per year;
- By a US-born domestic or foreign inspired terrorist: 1 in 28 million per year;
- A refugee: 1 in 3.86 billion per year;
- An illegal immigrant: 0.⁴⁹

If the goal of policymakers is to reduce the threat of terrorism, the data indicate we should be more focused on strengthening the vetting of tourists and business visitors. Notably, the 2019 Cato study also conducted a cost-benefit analysis and concluded travel bans are not a reasonable solution: “a moratorium on foreigners entering the country is costlier than the benefits, even when including the property, business, and economic costs caused by foreign-born terrorism.”

In the period from after 9/11 to 2017, Cato also determined “the chance of being murdered by a native-born terrorist was 4.3 times as great as being murdered by a foreign-born terrorist.” The current terrorist threat emanates from homegrown violent extremists - people who have radicalized while inside the U.S. - as well as from ideologies other than violent Salafi-jihadism. As CSIS has documented in studying terrorist attacks and plots going back to 1994, “far-right terrorism has significantly outpaced terrorism from other types of perpetrators, including from far-left networks and individuals inspired by the Islamic State and al-Qaeda.”⁵⁰⁵¹ Therefore to reduce attacks, it is paramount the homegrown threat is addressed with the same level of seriousness as the threat from foreign terrorists, within constitutional restrictions.

When I returned to government in 2017, the counterterrorism community had realized the tools developed in response to 9/11 – pushing the borders out, watchlisting, intelligence and law enforcement capabilities – were insufficient to address U.S. citizens being radicalized and mobilized to violence over the internet. There was also an increasing body of evidence indicating the reasons people radicalize to any violent ideology tend to be less tied to the ideology or religion, and more related to psychosocial factors and grievances in an individual's life. Consequently, arguing an individual out of an ideology rarely works, but addressing the underlying factors is key for disengagement and de-radicalization. This also means banning individuals from entry into the United States

⁴⁸ Cato's analysis includes those murdered in the terrorist attacks of September 11, 2001 - which make up a significant majority of the number of people killed by terrorists in the 43-year period studied.

⁴⁹ Alex Nowrasteh. (May 2019). *Terrorists by Immigration Status and Nationality: A Risk Analysis, 1975–2017* (No. 866). Cato Institute. https://www.cato.org/sites/cato.org/files/pubs/pdf/pa_866_edit.pdf.

⁵⁰ <https://www.csis.org/analysis/escalating-terrorism-problem-united-states>.

⁵¹ <https://www.washingtonpost.com/investigations/interactive/2021/domestic-terrorism-data/>.

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because of their religion or nationality is an ineffective tool to weed out terrorists. My DHS colleagues and I drafted a prevention [Strategy](#) in 2019 and launched the [Center for Prevention Programs and Partnerships](#) at DHS. We need to rapidly scale this additional “layer of defense” across the country to keep our communities safe. (For more on this topic, see [this article](#) I wrote for the 20th anniversary of the 9/11 attacks.)

The goal is not zero risk, the goal is a strong and continually improving layered set of defenses. We must vet who comes into the country, and we must continue to refine and improve sharing information between intelligence and law enforcement partners. We must support law enforcement efforts to detect and disrupt homegrown threats. We need to significantly strengthen and rapidly scale local prevention capabilities to intervene with individuals vulnerable to being radicalized to violence.

We should also continue to strengthen and review vetting procedures and the U.S. Refugee Admissions Program. Government programs are designed and executed by well-intentioned but imperfect individuals, usually woefully under-resourced. USCIS should complete the technological overhaul currently underway and move from a paper-based system to an electronic system seamlessly interconnected with the vetting process. The National Vetting Center needs to be properly funded, the National Vetting Enterprise fully staffed and implementation expedited. The National Counterterrorism Center needs additional resources to keep up with the expanding volume of data discovered about known and suspected terrorists. All of these require resources – time, funding, and personnel – and advocacy and accountability from all sides to ensure success.

The security-based arguments against refugee admissions have not been made in good faith with an eye toward improving policy. Constructive conversation must focus on the actual security challenges. Thoughtful leadership requires professionals and policymakers willing to assess risk, mitigate security concerns and care for humanity. Rather than fearmongering, we need to be having conversations about how we address the growing number of displaced persons in the world.

When I visited Egypt in 2018, I also met with Egyptian officials to understand the challenges they face in hosting the largest number of registered refugees and asylum-seekers in history.⁵² Those historic numbers have continued to increase. Though officially cited today as 265,000 refugees, that number likely does not capture the entire picture of what Egypt is supporting because it does not account for displaced persons living in Egypt but not registered with UNHCR. Later in 2018, I visited one of Greece’s Migrant Reception Centers on the Aegean Island of Chios, on the front lines of the European migration crisis of 2015-2016. Thousands of refugees drowned while fleeing the Syrian war attempting to cross the ~4-mile channel from Turkey.⁵³ To this day, thousands of refugees await the processing

⁵² <https://www.unhcr.org/eg/about-us/refugee-context-in-egypt>

⁵³ See for example: <https://www.newsweek.com/six-afghan-migrant-children-drown-turkish-coast-402518>.

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of their asylum claims, housed on Chios and other islands, in [conditions](#) which human rights advocates have [declared inhumane](#).

While these trips reassured me that U.S. partners robustly attempt to verify the identity of the individuals requesting asylum or refugee status and run security checks to ensure the individuals do not pose a security or public safety risk, I walked away concerned our efforts were not sufficient for the scope and scale of this global problem. Allowing displaced persons to languish in inhumane conditions for years, even a decade, is not only immoral if we have the resources to assist the situation, but doing so could also create environments rich for grievance and radicalization.

Displacement and migration remain a global challenge, whether examining the current situation on the Belarussian-Poland Border, the plight of millions fleeing Afghanistan, or the constant influx at the U.S. southern border. Experts have consistently sounded alarms at the increasing rates worldwide. Refugee resettlement helps a tiny fraction of the millions of individuals that have been forcibly displaced from their homes. We need a more comprehensive approach to this complex challenge to prevent future security challenges.

A successful comprehensive policy requires the United States to restore its leadership on refugee protection and participate in solutions with other developed countries. We cannot come to the table and ask others to do what we are unwilling to do.⁵⁴ Terrorists, malevolent and failed states do not stop plotting to attack the United States simply because we decide to take an “America First” isolationist approach. Enforcement alone has not and will not solve migration problems that have economic and humanitarian root causes. This is clear from the number of migrants and asylum seekers who arrived at our southern border despite a “harsh enforcement as deterrence” approach during the Trump Administration.

Welcoming refugees is a small but critical part in addressing the broader set of factors underlying the global migration challenge. Admitting refugees is in America’s security interest and economic interest. Multiple studies have shown refugees strengthen our economy.⁵⁵ Immigrants play a disproportionate role in entrepreneurship,⁵⁶

⁵⁴ Rosanna Kim and Ariana Berengaut, “Restoring U.S. Global Leadership on Refugee Protection,” National Conference on Citizenship & Penn Biden Center for Diplomacy and Global Engagement, October 2020, <https://global.upenn.edu/sites/default/files/penn-biden-center/Restoring%20U.S.%20Global%20Leadership%20on%20Refugee%20Protection.pdf>;

⁵⁵ For summaries of economic studies see: Jeff Mason, “*Immigrants as Economic Contributors: Refugees Are a Fiscal Success Story for America*,” National Immigration Forum, June 14, 2018, <https://immigrationforum.org/article/immigrants-as-economic-contributors-refugees-are-a-fiscal-success-story-foramerica>. and Bahar, Dany, “*Why accepting refugees is a win-win-win formula*,” Brookings, June 19, 2018, from <https://www.brookings.edu/blog/up-front/2018/06/19/refugees-are-a-win-win-win-formula-for-economic-development/>

⁵⁶ <https://hbr.org/2016/10/immigrants-play-a-disproportionate-role-in-american-entrepreneurship>

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refugee women outpace other immigrant and native-born women in labor force participation,⁵⁷ and the introduction of immigrants into the workforce encourages low-skilled native workers to enhance their skills, leading to more complex jobs and significant wage increases.⁵⁸ Refugees' native understanding of their home countries assist us with business development and trade.⁵⁹ A Trump administration study, required by an Executive Order, documented that refugees were a net gain for the economy: over a 10-year period, refugees brought in \$63 billion more in government revenue than the cost of the overall US Refugee Admissions Program.⁶⁰ (Of note, the public release of this study was blocked by a senior White House aide because the findings did not align with the preferred narrative.)⁶¹

It is in our nation's national security, foreign policy and economic interests to welcome refugees. The facts are clear, as studies demonstrate and national security professionals have testified: refugees can be admitted safely. It is time to shift the policy discussion to develop solutions to the remaining complex challenges. This requires honest dialogue, constructive conversations and sound policy crafted by principled arbitrators from all sides.

⁵⁷ Ramya Vijaya (2020) Comparing Labor Market Trajectories of Refugee Women to Other Immigrant and Native-Born Women in the United States, *Feminist Economics*, 26:4, 149-177, DOI: [10.1080/13545701.2020.1759815](https://doi.org/10.1080/13545701.2020.1759815)

⁵⁸ <https://voxeu.org/article/how-immigrants-and-job-mobility-help-low-skilled-workers>.

⁵⁹ <https://voxeu.org/article/long-run-trade-effect-vietnamese-boat-people>.

⁶⁰ <https://www.nytimes.com/2017/09/18/us/politics/refugees-revenue-cost-report-trump.html>.

⁶¹ Ibid.

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