



# Privacy Impact Assessment

for the

# Ombudsman Case Assistance Analytic Data Integration System

**DHS Reference No. DHS/CISOMB/PIA-001(a)**

**February 17, 2021**



**Homeland  
Security**



## Abstract

The U.S. Department of Homeland Security (DHS), Office of the Citizenship and Immigration Services Ombudsman (CISOMB) as mandated by Section 452 of the Homeland Security Act of 2002, is an independent office that reports directly to the Deputy Secretary of Homeland Security. CISOMB's mission is to: (1) assist individuals and employers who are experiencing difficulty resolving immigration benefit-related matters with U.S. Citizenship and Immigration Services (USCIS); (2) identify systemic challenges or trends with the delivery of immigration benefits; and (3) propose changes to mitigate those issues pursuant to 6 U.S.C. § 272(b). To accomplish this mission, CISOMB uses the Case Assistance Analytics and Data Integration (CAADI) system to process, track, and respond to requests for assistance, and to manage the workflow of cases. CISOMB is conducting this PIA to discuss the information that CISOMB receives from individuals and employers and processes through CAADI. This PIA updates and replaces the 2010 DHS/CISOMB/PIA-001 Virtual Ombudsman System PIA.

## Overview

CISOMB is dedicated to improving the quality of citizenship and immigration services delivered to the public by providing individual case assistance and making recommendations to improve the administration of immigration benefits by USCIS. CISOMB follows fundamental ombudsman principles, such as confidentiality, neutrality, and independence while undertaking its statutory mission. CISOMB does not have the authority to make or change USCIS decisions regarding any immigration matter.

Prior to requesting case assistance from CISOMB, individuals and employers must first attempt to resolve any issues directly with USCIS through one of the USCIS customer service options such as checking "My Case Status Online" for processing times or calling the USCIS Contact Center.<sup>1</sup> In the event that an individual or employer is dissatisfied with the USCIS response to a case-related question or believes the disposition of an application or petition was made in error or is unduly delayed, further assistance may be sought from CISOMB.

CISOMB provides cases assistance to address both procedural and substantive matters. Examples of procedural matters include: typographic errors in immigration documents; cases that are past normal processing times; USCIS failure to schedule biometric appointments, interviews,

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<sup>1</sup> For more information about USCIS customer service, *see* U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CUSTOMER RELATIONSHIP INTERFACE SYSTEM, DHS/USCIS/PIA-019 (2008 and subsequent updates); U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR CUSTOMER SCHEDULING AND SERVICES, DHS/USCIS/PIA-046 (2014 and subsequent updates); U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE NATIONAL CUSTOMER SERVICE CENTER, DHS/USCIS/PIA-054 (2014), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



naturalization oath ceremonies, or other appointments; change of address and mailing issues; refunds in cases of clear USCIS error; and lost files or file transfer problems. Examples of substantive matters include clear errors of facts or the misapplication of applicable laws and regulations.

## **Case Assistance**

Individuals/employers (or their legal/accredited representatives) seeking case assistance from CISOMB submit their request using the Form DHS-7001, *Case Assistance Form*, which can be completed and submitted electronically on the CISOMB website.<sup>2</sup> Individuals/employers are also able to attach and submit supporting documentation related to their request, such as paperwork previously submitted to USCIS. The electronic form (DHS-7001) automatically converts and transfers the information submitted therein into CAADI. Cases within CAADI have a corresponding field for each section of Form DHS-7001, so that each piece of information entered by the individual/employer appears in the CAADI record. Once an individual completes the online form, all data from the browser session is deleted from the individual's computer.

Individuals/employers are encouraged to use the online form but can also download a PDF version of the form from the CISOMB website and then submit the form and supporting documentation through mail, email, or fax.<sup>3</sup> When a Form DHS-7001 is received by these methods, CISOMB personnel manually create a case and input the data and supporting documentation from the form into the CAADI system. CISOMB personnel create a case in the CAADI system by entering the data from the hardcopy and uploading the supporting documents.

Once a request is submitted online, the individual will receive an emailed auto-response to acknowledge receipt of the case. If the case was submitted via mail, email, or fax, CISOMB personnel will send an email or letter, depending on the mode of submission, to the submitter acknowledging receipt of the request.

## **Case Assistance Analytic and Data Integration (CAADI) System**

The CAADI system is an internal (i.e., behind the DHS firewall) system that CISOMB personnel use to process, track, and respond to requests for assistance from individuals and employers, and to manage the workflow of cases. Only CISOMB and Office of the Chief Information Officer (OCIO) operations and maintenance personnel have access to the CAADI system. The CAADI system enables CISOMB to segregate data into several categories to provide customized feedback to individuals and employers, generate internal reports, and supply real-time aggregated statistical information about the office workflow.

CAADI assists CISOMB in accomplishing its statutory mandate in a more efficient and

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<sup>2</sup> The electronic Form DHS-7001 is available at <https://www.dhs.gov/topic/cis-ombudsman/forms/7001>.

<sup>3</sup> The downloadable Form DHS-7001 and associated instructions for submission via mail, email, or fax is available at <https://www.dhs.gov/publication/form-dhs-7001-instructions>.



effective manner and reduces the amount of time dedicated to data entry and collection by affording an individual or employer with the option to submit their information electronically, feeding it directly into the CAADI system via the Form DHS-7001 web interface. CISOMB can also use the reports and statistics generated by CAADI to assist with identifying systemic challenges and trends and proposing changes to mitigate those issues.

## **Case Intake and Processing**

When a Form DHS-7001 is entered into CAADI system, either automatically or manually, it is reviewed by senior CISOMB personnel (via a process called “triage”) to determine:

1. Whether the issue is within CISOMB’s jurisdiction. If not, the triage analyst will mark the case as resolved and notify the applicant via email;
2. Whether there are issues that meet criteria set by USCIS for a case to be expedited.<sup>4</sup> If so, the triage analyst will indicate on the case record that it is expedited and it will be routed to a separate expedite queue; and
3. Whether the information submitted is complete and the case is ready to be worked by CISOMB personnel. If not, the triage analyst will contact the individual/employer with a request for the necessary information and inform them that the information must be sent within seven days or the record will be closed.

When triage is complete, the triage analyst routes the case to the appropriate queue within CAADI, where the case is then assigned to an Immigration Law Analyst for an in-depth review. The Immigration Law Analyst will use the identifying information from the case to search available USCIS systems<sup>5</sup> for the current status of the applicant’s petition. At this time, the Immigration Law Analyst will also look for any discrepancies between the information given by the applicant and the information contained in USCIS systems. Any discrepancies are resolved by contacting the applicant or the relevant USCIS office, whichever is more likely to have the most accurate information.

Upon review, CISOMB personnel may inquire with USCIS on the status of the case. These inquiries are sent by email to the USCIS office of jurisdiction and include a summary of the applicant’s issue as well as identifying information (e.g., name, date of birth, Alien Number) that USCIS can use to query its internal data systems and retrieve the hardcopy file, as necessary. CISOMB may also discuss the case with the individual or employer who submitted it for additional

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<sup>4</sup> USCIS may consider an expedited request if one or more of the following criteria are met: severe financial loss, urgent humanitarian reasons, compelling U.S. government interest, clear USCIS error. *See* USCIS Webpage, <https://www.uscis.gov/forms/filing-guidance/how-to-make-an-expedite-request>.

<sup>5</sup> For more information on the USCIS systems that CISOMB accesses, *see* U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR USCIS AND CISOMB INFORMATION SHARING, DHS/USCIS/PIA-073 (2018), Appendix A, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.





clarification of the issue or may determine that no action is currently required by CISOMB (e.g., USCIS is still within their established processing times for the case). Once a resolution to the applicant's issue is achieved, or if it is determined that there is no further step CISOMB can take to assist them, the case is considered resolved. CISOMB notifies the applicant of the outcome of inquiries made to USCIS and that their case is closed. These actions and their outcomes are documented within the CAADI system along with the contents of any correspondence with the applicant or USCIS.

## **Reporting and Metrics**

CAADI also supports the creation of charts, graphs, and customized reports based on information collected through the Form DHS-7001. This information is aggregated and does not include PII. CISOMB uses these products to provide feedback and recommendations to USCIS, both formally and informally, and to report to Congress on areas where USCIS could improve delivery of immigration services and benefits. CAADI also provides metrics and statistics to assist CISOMB in understanding and improving office workflow and efficiency. This information does not include PII.

## **Section 1.0 Authorities and Other Requirements**

### **1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?**

The specific legal authorities that define this collection of information are articulated in the Homeland Security Act of 2002, 6 U.S.C. § 272; Title VI the Civil Rights Act of 1964; Departmental Regulation (5 U.S.C. § 301); and Records Management by Federal Agency Heads (44 U.S.C. § 3101).

### **1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

The information collected from individuals/employers and stored in CAADI is covered by DHS/CISOMB-001 Virtual Ombudsman System.<sup>6</sup>

### **1.3 Has a system security plan been completed for the information system(s) supporting the project?**

This PIA update does not change the Authority to Operate (ATO) for CAADI. The ATO was granted on August 27, 2013. The CAADI system was implemented, approved, and authorized by the DHS Chief Information Officer (OCIO), Information Sharing and Services Office (IS2O) and is compliant with all Federal Information Security Management Act (FISMA) and Agency

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<sup>6</sup> See DHS/CISOMB-001 Virtual Ombudsman System, 75 Fed. Reg. 8857 (April 3, 2010), *available at* <https://www.dhs.gov/system-records-notices-sorn>. This SORN is currently in the process of being updated.



Privacy Management requirements.

## **1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?**

In accordance with the NARA-approved retention and disposal schedule DAA-0563-2019-0004,<sup>7</sup> processed requests at the final disposition phase of the case are deleted or destroyed three years after resolution. Uncompleted requests are the record copy of request for assistance where additional information was requested, but not received. Individuals/employers are notified that their requests will be closed if their responses are not received within seven business days. Cases are closed 30 days after the request for additional information. They are deleted and destroyed three years later. In a case where the Form DHS-7001 is submitted in paper form via mail or fax, a CAADI case is created, all information is entered into it, and the paper form is destroyed. In a case where the Form DHS-7001 is submitted as a PDF via email, a CAADI case is created, all information is entered into it, the PDF is saved to the record as an attachment, and the email is deleted. Any supporting documentation is retained and destroyed according to the same retention schedules and practices as the Form DHS-7001 itself.

## **1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.**

Form DHS-7001, OMB Control number is 1601-0004, is covered by the PRA. Any forms added to CAADI will be listed in Appendix A.

## **Section 2.0 Characterization of the Information**

### **2.1 Identify the information the project collects, uses, disseminates, or maintains.**

CISOMB collects the following information via Form DHS-7001 about individuals requesting case assistance:

- Individual's full legal name, including any aliases;
- Individual's date and country of birth;
- Individual's legal country of citizenship;

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<sup>7</sup> See NATIONAL ARCHIVES AND RECORDS ADMINISTRATION, REQUEST FOR RECORDS DISPOSITION AUTHORITY, OFFICE OF CITIZENSHIP IMMIGRATION SERVICES OMBUDSMAN (2019), available at [https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-homeland-security/rg-0563/daa-0563-2019-0004\\_sf115.pdf](https://www.archives.gov/files/records-mgmt/rcs/schedules/departments/department-of-homeland-security/rg-0563/daa-0563-2019-0004_sf115.pdf).



- Individual's Alien Number;
- Individual's contact information, including mailing address, email address, phone number, and fax number;
- Full legal name of person preparing the form if other than the individual name in the case;
- Applications and petitions filed;
- Receipt number received from USCIS in response to application/petition filed;
- Immigration status or interim benefit applied or petitioned for;
- Type of case problem;
- Source of case problems;
- Description of case problems;
- Prior actions taken to remedy the problem;
- Name of and contact information for designated attorney/representative, if applicable;
- Consent of the petitioner for USCIS to disclose information in the file to the designated representative, if applicable;
- Verification statement signed and dated by the subject of the request or the authorized representative;
- Declaration by the individual or the attorney or representative submitting the case problem; and
- Supporting documentation attached to the form submission, such as evidence submitted to USCIS, documents received from USCIS, or other information the individual feels is relevant or important.

CAADI also maintains CISOMB personnel information for the appropriate creation and provisioning of user accounts, such as: name, job title, phone number, email address, and DHSNET Username.

The CAADI system also helps generate various reports based on the systematic issues raised in the requests received from individuals and employers. This information, which does not include PII, is articulated in:

- The Ombudsman's Annual Reports to Congress and any official recommendations to USCIS;
- Detailed reports providing list of pending, unassigned, and assigned cases;



- Management reports that help monitor workloads, determine resource needs, and recognize problem areas;
- Summary reports that provide management and analysis information; and
- Troubleshooting reports identifying potential problems.

The CAADI system contains a list of CISOMB personnel who are users of the system. The user profile is created to enable the staff members to gain access to the system. The CAADI system also contains a list of names and email addresses for points of contacts at each USCIS Service Center and Field Office. This list is updated by CISOMB staff as necessary.

## **2.2 What are the sources of the information and how is the information collected for the project?**

CISOMB collects information from members of the general public who seek assistance from the Ombudsman in resolving their case problems with USCIS through the Form DHS-7001, Case Assistance Form. CISOMB also accesses and receives information from USCIS; this information is entered into CAADI, as appropriate.

## **2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.**

No. CISOMB does not use any information derived from commercial sources or publicly available information.

## **2.4 Discuss how accuracy of the data is ensured.**

CISOMB personnel check information in CAADI against information in USCIS systems for accuracy by comparing it with data previously submitted and verified by USCIS. CISOMB personnel may also correspond with individuals/employers to verify information and resolve cases. For example, if an individual/employer submits a request for assistance to CISOMB and the information the person submits does not match the information currently held by USCIS, CISOMB will attempt to clear the discrepancy by contacting USCIS or the individual/employer (or their representatives) to request clarification. Whether USCIS or the individual/employer is contacted depends on which would be more likely to have definitive information.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** There is a risk that information collected on Form DHS-7001 or information contained in the attached documents submitted with the Form DHS-7001 may be inaccurate.

**Mitigation:** This risk is partially mitigated. CISOMB collects information directly from





the requester or their legal representative using Form DHS-7001. Supporting documentation is also provided directly by the requester. CISOMB personnel working on the case verify accuracy of submitted information by comparing it against available information in USCIS systems. CISOMB resolves any inconsistencies in the form and/or the supporting documentation by contacting the individual who submitted the information or the relevant USCIS office. If the information is submitted by a legal representative, CISOMB will only contact the legal representative, so a risk remains that the legal representative may submit inaccurate information.

**Privacy Risk:** If an individual submits Form DHS-7001 via mail, email, or fax, the information could be inaccurately entered into CAADI during the manual entry process.

**Mitigation:** This risk is mitigated. There is always a risk of mistakes during data entry, but CISOMB personnel perform the same process of verifying accuracy whether information is submitted electronically via the online form or via mail, email, or fax. Personnel will contact the preparer of the request, as required, to resolve inconsistencies or typing errors.

## **Section 3.0 Uses of the Information**

### **3.1 Describe how and why the project uses the information.**

CISOMB collects biographical data and case information to assist individuals and employers who are experiencing difficulty resolving immigration benefit-related matters with USCIS. Aggregated case information is also used to identify systemic challenges or trends with the delivery of immigration benefits and propose changes to mitigate those issues pursuant to 6 U.S.C. § 272(b).

### **3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.**

No, there is no specific technology used to conduct electronic searches to locate predictive patterns or anomalies.

### **3.3 Are there other components with assigned roles and responsibilities within the system?**

Only CISOMB personnel use the CAADI system; OCIO personnel provide technical operations and maintenance support.

### **3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk that information in the CAADI system will be accessed by individuals without the proper clearances and without a need to know.



**Mitigation:** This risk is mitigated. CISOMB personnel receive annual privacy training and introductory training on CAADI before they are given an account name and password, and specialized CISOMB access and security control training as a prerequisite for authorization to use the system. All CISOMB staff are able to see information on any case, but ability to edit information is restricted through user permissions.

## Section 4.0 Notice

### 4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

A Privacy Act Statement is available to the individual or employer at the point of collection on both the DHS webpage and paper Form DHS-7001. The Privacy Act Statement covers the authority, purpose, routine uses, and effects on the individual or employers as it relates to the collection. CISOMB also provides general notice to individuals through the publication of this PIA and corresponding SORN. Additional information about the Ombudsman and its mission is available on the agency website.

### 4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

CISOMB assists individuals and employers who are unable to resolve problems directly with USCIS. To receive assistance with a problem regarding an application or petition with USCIS, individuals may submit Form DHS-7001 to CISOMB. The Form DHS-7001 includes a Privacy Act Statement, which informs the individuals that provide their information is voluntary. An individual can choose to decline to provide information; however, that may prevent the individual from receiving case assistance from CISOMB.

### 4.3 **Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that individuals may be unaware that CISOMB will share their information with USCIS or with external agencies.

**Mitigation:** This risk is mitigated. Information is collected directly from Form DHS-7001, which states that by submitting this information to CISOMB, individuals consent to the review of the information and allows CISOMB to contact USCIS on the individual's behalf. CISOMB also provides individuals, employers, and/or their legal representatives with a Privacy Act Statement before they submit any information to CISOMB. Further, any CISOMB actions are generally taken with the individual's consent.



## Section 5.0 Data Retention by the project

### 5.1 Explain how long and for what reason the information is retained.

Records residing in CAADI will be maintained and retained by CISOMB in accordance with the NARA General Records Schedule DAA-0563-2019-004. Processed requests at the final disposition phase of the case are deleted or destroyed three years after resolution. Uncompleted requests are the record copy of request for assistance where additional information was requested, but not received. Individuals/employers are notified that their requests will be closed if their responses are not received within seven business days. Cases are closed 30 days after the request for additional information. They are deleted and destroyed three years later.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** There is a risk that case information submitted via mail, email, or fax could be retained after the data has been entered into the CAADI system.

**Mitigation:** This risk is mitigated. Standard operating procedures have been implemented by CISOMB to destroy paper submissions of Form DHS-7001 and to delete emails containing attached PDF versions of the form. CISOMB staff are regularly trained on these procedures to ensure adherence to the above retention schedule.

## Section 6.0 Information Sharing

### 6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Information submitted on the Form DHS-7001 is collected and directly input into the CAADI system, whether electronically or by CISOMB personnel. Information is shared outside of DHS on a need to know basis and in accordance with the routine uses outlined in the DHS/CISOMB-001 Virtual Ombudsman System SORN. CISOMB does not share data directly from the CAADI system. CISOMB may send inquiries via email or phone call on a need to know to resolve a case issue or to obtain case status. These inquiries may be sent to the National Visa Center (NVC), which is an entity of the U.S. Department of State, and the Executive Office for Immigration Review (EOIR) and Board of Immigration Appeals (BIA), which are part of the U.S. Department of Justice.

CISOMB sends inquiries to those agencies by providing information such as receipt numbers or beneficiary or petitioners' names to obtain status updates on a customer's case in order to assist that individual. This type of information already exists in those agencies' files, records, and databases.



## **6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.**

CAADI collects individuals' personal information to support the Ombudsman's efforts to resolve case issues through collaboration with other agencies. This information is also used to formulate recommendations to USCIS pursuant to 6 U.S.C. 272(b). CISOMB only shares data with external agencies pursuant to a routine use in the DHS/CISOMB-001 Virtual Ombudsman SORN and when the information will be used for a purpose that is compatible with CISOMB's mission. Strict controls have been imposed to minimize risk of compromising the information that is being stored. Access to the CAADI system is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions.

## **6.3 Does the project place limitations on re-dissemination?**

No limitations on re-dissemination restrictions are placed on the external organizations as those agencies listed above are the owners of the information requested.

## **6.4 Describe how the project maintains a record of any disclosures outside of the Department.**

CISOMB maintains a record of the requests and the results of those requests or responses in CAADI. CAADI maintains records of the outcome of each request, including the date of the request and the response.

## **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** There is a risk that information contained in CAADI may be shared improperly with individuals who do not have a need to know the information.

**Mitigation:** This risk is mitigated. CISOMB does not share information directly from CAADI. CISOMB may send inquiries on a case-by-case basis to external agencies to obtain status updates on particular cases, but all such sharing is performed in accordance with the routine uses outlined in the DHS/CISOMB-001 Virtual Ombudsman SORN. Additionally, the external agencies with whom the information is shared already have access to the same information in their own databases.

## **Section 7.0 Redress**

### **7.1 What are the procedures that allow individuals to access their information?**

Individuals or employers seeking access to any record containing information that is part of CAADI may submit a Freedom of Information Act (FOIA) request. U.S. citizens, lawful



permanent residents, and individuals who have records covered under the Judicial Redress Act (JRA) may file a Privacy Act (PA) request to access their information. Individuals may obtain instructions on how to submit a FOIA/PA request at <https://www.dhs.gov/how-submit-foia-or-privacy-act-request-department-homelandsecurity>. Individuals or employers can submit requests in writing to the address below, indicating in their request that it is for CISOMB records. DHS also allows Privacy Act and FOIA requests to be submitted electronically at <https://www.dhs.gov/dhs-foia-privacy-act-request-submission-form>.

Chief Privacy Officer and Chief Freedom of Information Act Officer  
Privacy Office, Department of Homeland Security  
2707 Martin Luther King Jr. Avenue, SE  
Washington, D.C. 20528

Further information about how to contact CISOMB is available at <https://www.dhs.gov/contact-cisomb>.

## **7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

Individuals experiencing difficulties with the immigration benefits process may contact CISOMB to request case assistance. CISOMB contacts and works with USCIS to respond to and resolve customer inquiries. All customers, regardless of citizenship or lawful permanent resident status, may correct erroneous information by contacting CISOMB by phone, email, fax, or mail. U.S. citizens and lawful permanent residents are additionally afforded the ability to correct information by filing a Privacy Act Amendment request under the Privacy Act. Individuals may direct all requests to contest or amend information to the USCIS FOIA/PA Office. More information is available at: <https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act>.

## **7.3 How does the project notify individuals about the procedures for correcting their information?**

CISOMB notifies individuals of the procedures for correcting their information through this PIA, Privacy Act Statement and other notices on Form DHS-7001, and the CISOMB portion of the DHS website.

## **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that the individual or employer will not know how to gain access to their information, how to correct it, and where redress is provided.

**Mitigation:** This risk is mitigated. CISOMB notifies the individual or employer through the Privacy Act Statement at the point of collection on Form DHS-7001, through this PIA, and by





following the notification procedures section of the DHS/CISOMB-001 Virtual Ombudsman System SORN. Additional information is available on the agency website.

## **Section 8.0 Auditing and Accountability**

### **8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?**

CISOMB ensures that the practices stated in this PIA comply with federal, DHS, and CISOMB policies and procedures through various measures including standard operating procedures, orientation and training, rules of behavior, and auditing and accountability procedures.

CAADI allows for the auditing and tracking of any user action taken within the system. Additionally, any actions taken regarding an individual's or employer's case or workflow are tracked and logged for security control and continuity of operations. Any correspondence back to an individual or employer is tracked and logged.

Current CISOMB operations do not involve an IT system other than the designated portion of the DHS webpage containing the electronic Form DHS-7001 and CAADI. Access to CAADI is restricted to CISOMB staff, contractors, and other authorized DHS personnel (e.g., OCIO technical support staff) with a need to know.

Because CISOMB's webpage is a user interface to the electronic Form DHS-7001, roles are not necessary or available. Roles are, however, in place for CAADI. Further, because CISOMB's webpage is a portion of the larger, DHS public-facing website, this webpage conforms to guidance governing the larger website. CISOMB employs Immigration Law Analysts and Immigration Case Assistants to review and analyze case problems and trends filed by an individual or employer. The Ombudsman's CAADI Program Manager is the Management and Program Analyst assigned to administer and provide oversight for the CAADI system.

### **8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.**

All federal employees and contractors, including CISOMB staff, are required to complete annual privacy and security awareness training. The Privacy Awareness training addresses appropriate privacy concerns including Privacy Act obligations. The Computer Security Awareness training also examines appropriate technical, physical, personnel, and administrative controls to safeguard information. In addition, CISOMB conducts internal training specifically focusing on the use of the CAADI system, providing necessary awareness of the functionality of the system as it pertains to the secure processing, storage, and retrieval of information.



### **8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?**

Access to information contained in CISOMB's system and case files is provided on a need to know basis, which is determined by the users' respective responsibilities. CISOMB personnel with a valid need to know will be granted access to CAADI to assist with requests for case assistance and/or to participate in the study of systemic issues, consistent with the office's statutory mission. Once it is determined that personnel no longer have a need to know (e.g., separation from the office, change of role), their access is immediately revoked.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

All MOUs, MOAs, and similar agreements are reviewed by the CAADI Program Manager and senior CISOMB personnel, as appropriate, before being forwarded as needed to other DHS Headquarters offices (e.g., Privacy Office, Office of the General Counsel) for a formal review.

## **Contact Official**

Zoubair Moutaoukil  
Office of the Citizenship and Immigration Services Ombudsman  
(202) 357-8537

## **Responsible Official**

Gary Merson  
Chief of Staff  
Office of the Citizenship and Immigration Services Ombudsman  
(202) 357-8103

## **Approval Signature**

Approved, signed copy on file at the DHS Privacy Office.

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James Holzer  
Acting Chief Privacy Officer  
U.S. Department of Homeland Security  
(202) 343-1717