



Privacy Impact Assessment
for

USCIS and CISOMB Information Sharing

DHS/USCIS/PIA-073

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Abstract

The Department of Homeland Security (DHS) Office of the Citizenship and Immigration Services Ombudsman (CISOMB), established by Section 452 of the Homeland Security Act of 2002, provides independent analysis of problems encountered by individuals and employers who have submitted benefit request filings to U.S. Citizenship and Immigration Services (USCIS) and proposes changes to mitigate those problems. Sharing information between USCIS and CISOMB, where there is proper consent, is crucial to fulfilling this statutory mandate. USCIS is conducting this Privacy Impact Assessment (PIA) to discuss how USCIS provides information to CISOMB in order to (1) assist individuals and employers with resolving problems with USCIS; (2) identify programmatic areas where individuals and employers have problems in dealing with USCIS; and (3) propose changes to mitigate those problems.

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 USCIS. CISOMB provides impartial and independent advice to USCIS in an attempt to resolve outstanding issues with cases pending final adjudications. CISOMB does not have the authority to make or change USCIS decisions.

Prior to requesting assistance from CISOMB, individuals and employers must first attempt to resolve any issues directly with USCIS through at least one of the following USCIS customer service channels:

- Check *My Case Status Online* for processing times;¹
- Request assistance from USCIS using the *e-Request* tool to check on appointment accommodations, typographic errors, delayed delivery of documents, notices or cards by mail, or if a case is beyond the normal processing times;²
- Call the *USCIS National Customer Service Center*;³ or
- Make an *INFOPASS* Appointment with USCIS.⁴

USCIS is fundamentally transforming the delivery of immigration services while continuing to adjudicate millions of applications and petitions each year. USCIS strives to maintain an efficient and high quality level of service despite fluctuations in the demand for USCIS services. USCIS remains committed to making improvements in processing times and service delivery across the

¹ See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

² See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

³ See DHS/USCIS/PIA-054 National Customer Service Center, available at www.dhs.gov/privacy.

⁴ See DHS/USCIS/PIA-046 Customer Scheduling and Services, available at www.dhs.gov/privacy.



spectrum of applications and petitions. However, in the event 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, further assistance may be sought from CISOMB.

CISOMB provides case assistance to address both procedural and substantive matters. Examples of *procedural matters* include typographic errors in immigration documents; cases that are 60 days past normal processing times; USCIS' failure to schedule biometric appointments, interviews, 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 applications and petitions that were improperly rejected by USCIS; and systemic issues that should be subjected to higher-level review (e.g., the exercise of discretion,⁵ the misapplication of evidentiary standards, USCIS employees failing to comply with its policies).

Individuals seeking case assistance from CISOMB on a pending application or petition may submit an electronic Form DHS-7001⁶ through the Ombudsman Case Assistance Online⁷ system, which provides a direct, paperless submission of requests for assistance. Assistance should only be sought when an individual or employer has first attempted to obtain redress directly with USCIS. Customers are encouraged to use the online form, but can submit a paper-based Ombudsman Form DHS-7001 by downloading and completing a PDF version and submitting the form through mail, e-mail, or fax to CISOMB.

CISOMB reviews all incoming case assistance requests by examining facts, reviewing relevant data systems, and analyzing applicable laws, regulations, policies, and procedures. After assessing each case in this manner, CISOMB may contact USCIS service centers, field offices, and other facilities to request that USCIS engage in remedial actions. If CISOMB is unable to assist, it will inform the individual or employer that the matter is outside the scope of CISOMB's authority or otherwise does not merit further action.⁸

CISOMB is not an appellate body and cannot make or change decisions that were made by USCIS in accordance with applicable procedures and law. Additionally, CISOMB does not have the authority to reopen a case or to reverse any decisions the agency may have made. Petitioners

⁵ USCIS and CBP officers have the authority to exercise prosecutorial discretion. See <https://www.uscis.gov/policymanual/HTML/PolicyManual-Volume9-PartA-Chapter5.html> for more information.

⁶ Available at <https://cisomb.dhs.gov/oca/form7001.aspx>.

⁷ See DHS/CISOMB/PIA-001 Virtual Ombudsman System (VOS), available at www.dhs.gov/privacy. The VOS is comprised of the OCA (Online Case Assistance) System and the CAADI (Case Assistance Analytics and Data Integration) System.

⁸ CISOMB's jurisdiction is limited by statute to problems involving USCIS. CISOMB does not have the authority to assist with problems that individuals or employers experience with U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), the U.S. Department of State (DOS), the Executive Office for Immigration Review (EOIR), or the U.S. Department of Labor (DOL). However, it may be possible for the Ombudsman to assist if the application involves both USCIS and another government entity.



and applicants for certain categories of immigration benefits may appeal a negative decision to the USCIS Administrative Appeals Office (AAO), which is responsible for conducting administrative review of appeals to ensure consistency and accuracy in the interpretation of immigration law and policy, or they may appeal to the Board of Immigration Appeals (BIA), where applicable.⁹

System Access

CISOMB receives requests for assistance from individuals and employers experiencing difficulties with the immigration benefits process. To support case assistance, USCIS provides CISOMB access to several USCIS systems. Appendix A includes a complete list of USCIS systems to which CISOMB has access. The Appendix will be updated as USCIS provides CISOMB access to additional systems.

Prior to contacting USCIS, CISOMB accesses USCIS's major applications to provide expert case assistance and to research systemic issues. CISOMB uses any information gleaned to determine whether to proceed with the case assistance request from the customer. The more information CISOMB is able to access, the better it can assess whether an inquiry should be made with USCIS. Information can also determine to which office to direct the inquiry. CISOMB formulates recommendations to USCIS—both formally and informally—to resolve problems, and reports to Congress on areas where USCIS could improve the delivery of immigration services and benefits. CISOMB issues formal recommendations to USCIS and per the statute USCIS is required to respond to those recommendations within three months. CISOMB responds to smaller scale issues that don't require a USCIS response within three months through informal recommendations submitted as one-pagers or white papers in which the CISOMB studies an issue, identifies solutions, and make recommendations.¹⁰

Requests for Information

Pursuant to its statutory functions, CISOMB is the recipient of requests for assistance from individuals and employers experiencing difficulties with the immigration benefits process. CISOMB makes general, expedited,¹¹ extended,¹² and priority¹³ case inquiries to the appropriate

⁹ See DHS/USCIS/PIA-062 Administrative Appeals Office (AAO) Case Management System, available at www.dhs.gov/privacy.

¹⁰ CISOMB may informally bring systemic issues to USCIS's attention for resolution. CISOMB also issues a formal recommendation by sending the recommendation directly to the USCIS Director for consideration and comment, and also issues an annual report.

¹¹ USCIS may expedite a petition or application if it meets one or more of the following criteria: severe financial loss to company or person; emergency situation; humanitarian reasons; nonprofit organization whose request is in furtherance of the cultural and social interests of the United States; Department of Defense or national interest situation; USCIS error; or compelling interest of USCIS.

¹² Extended Review cases are those pending at least 6 months outside normal processing times without a final resolution where the delay is not attributable to the applicant and/or petitioner, and where the Ombudsman has attempted to resolve the case with the USCIS office of jurisdiction.

¹³ CISOMB may also request priority case assistance for cases that do not fall within the expedite criteria. In such



USCIS Program Office and Directorate with case-related issues or concerns from individuals and employers or their representatives, if applicable. CISOMB directs the case inquiry to the designated USCIS Points of Contact (POC). USCIS POCs are senior representatives from USCIS offices, including: Service Center Operations Directorate (SCOPS), Field Office Directorate (FOD), AAO, the Refugee, Asylum, and International Operations Directorate (RAIO), and the Customer Service and Public Engagement Directorate (CSPED). USCIS uses an Enterprise Collaboration Network (ECN) or a shared drive to securely collect and store information in a centralized location to respond to the general, expedited, extended, or priority case inquiries. If a case is pending a fraud investigation, or has been transferred to U.S. Immigration and Customs Enforcement (ICE), or there are other similar special circumstances, this information will not be relayed to the customer.

CISOMB may also request to review case files, including Alien Files,¹⁴ Temporary Files,¹⁵ and receipt files,¹⁶ to perform its statutorily mandated case assistance services. CISOMB makes these requests to CSPED. CSPED makes the official paper records available for review by CISOMB at USCIS Headquarters or a designated location. In the event the case file is not within USCIS custody, CSPED works to obtain a copy of the file to provide to the CISOMB. USCIS reserves the right to hold the file where there is a pending application or petition until completion of the adjudication. CISOMB must keep case file information confidential as required by applicable law. CISOMB will not be permitted to maintain files without direct USCIS supervision.

Upon request, files may also be made available to CISOMB in digital form on a CD or similar functional media. CISOMB may not share information contained within the file with anyone not having prerequisite access or without explicit consent from USCIS, and must destroy or return any copies of files once their research is completed. When the Ombudsman determines that a case review warrants further consideration from leadership at the USCIS Headquarters, CISOMB submits a detailed written request through CSPED outlining the procedural history of the matter, relevant case details, and reasons for the request for USCIS leadership consideration.

instances CISOMB will provide a written explanation of the reasons for the priority request as part of the case inquiry.

¹⁴ Alien Files, or "A-Files," are individual files identified by subject's Alien Registration Number ("A-number"). An A-number is a unique personal identifier assigned to a non-citizen. A-Files became the official file for all immigration and naturalization records created or consolidated since April 1, 1944.

¹⁵ Temporary Files (T-Files) are temporary files that are created to store permanent documentation when the original A-File cannot immediately be located, or is pending receipt from another USCIS Office.

¹⁶ Receipt Files serve as an adjunct to the A-File. Each Receipt File houses a specific form type including supporting documentation, and each form type and/or group of form types must be maintained for various time periods based on the administrative, fiscal, and legal needs of the USCIS.



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?

Pursuant to Section 452 of the Homeland Security Act of 2002, the CISOMB provides case assistance to individuals and employers, in addition to making recommendations to USCIS to improve immigration services. 6 U.S.C. § 271(a)(3)(E) requires USCIS and CISOMB to meet regularly in order to consult on resolving problems. Information sharing between USCIS and CISOMB, where there is the proper consent of the individual or employer, is crucial to fulfilling this statutory mandate.

Additionally, the DHS Delegation Citizenship and Immigration Services CISOMB (DHS Delegation 22000, Issue Date 9/30/2011), the Memorandum of Understanding Between U.S. Citizenship and Immigration Services and the Citizenship and Immigration Services Ombudsman signed 23 Feb 2012 and the DHS Memorandum “DHS Policy for Internal Information Exchange and Sharing” dated February 1, 2007, authorizes the sharing of information between DHS components, including USCIS and CISOMB. Further, CISOMB and USCIS memorialized their information sharing efforts in a Memorandum of Understanding entitled “USCIS and CISOMB Information Systems Access Agreement” dated March 16, 2016.

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

The following Privacy Act System of Records Notices apply to the collection, use, maintenance, and dissemination of information:

- Alien File, Index, and National File Tracking System,¹⁷ which covers the collection, use, and maintenance of benefit requests forms and supplemental;
- Inter-Country Adoptions Security,¹⁸ which covers the collection and use of adoption forms, decisional data, and associated fees for adjudication;
- Benefits Information System,¹⁹ which covers the collection and use of immigrant and nonimmigrant benefit request forms, decisional data, and associated fees for adjudication;
- Fraud Detection and National Security Records,²⁰ which covers the cases referred to Center Fraud Detection Operation for administrative inquiry and identified as benefit fraud;

¹⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

¹⁸ DHS/USCIS-005 Inter-Country Adoptions Security, 81 FR 78614 (Nov. 8, 2016).

¹⁹ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

²⁰ DHS/USCIS-006 Fraud Detection and National Security Records (FDNS) 77 FR 47411 (Aug. 8, 2012).



- Asylum Information and Pre-Screening System of Records,²¹ which covers the collection and use of affirmative asylum applications, applications filed with USCIS for suspension of deportation, special rule cancellation of removal pursuant to the Nicaraguan Adjustment and Central American Relief Act, credible fear screening cases, and reasonable fear screening cases;
- Refugee Case Processing and Security Information System of Records,²² which covers the collection and use of refugee follow to join request forms, decisional data, and associated for adjudication; and
- Virtual Ombudsman System,²³ which provides efficient and secure case management and processing of information related to individuals' and employers' problems with USCIS.

USCIS will add an Appendix to document any new system access resulting in additional SORNs.

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

Yes. The system security plans for the respective case management systems cover CISOMB as a user of the system. The system security plans were completed by USCIS.

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

Yes. USCIS has NARA-approved retention schedules for its case management systems. For more information on the type of information each system collects, uses, disseminates, and maintains, as well as system retention schedules, please refer to the system PIAs referenced in Appendix A available at www.dhs.gov/privacy. CISOMB has an updated records retention schedule currently pending with NARA.

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.

The USCIS and CISOMB information sharing initiative is not subject to the PRA.

²¹ DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (Nov. 30, 2015).

²² DHS/USCIS-017 Refugee Case Processing and Security Information System of Records, 81 FR 72075 (Oct. 19, 2016).

²³ DHS/CISOMB-001 Virtual Ombudsman System, 75 FR 18857 (Apr. 13, 2010).



Section 2.0 Characterization of the Information

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

USCIS provides CISOMB access to several USCIS systems. The information within the systems includes information regarding in-process and adjudicated benefit requests. USCIS systems include information on benefit requestors, beneficiaries, family members, sponsors, preparers, attorneys, and designated representatives. For more information on the type of information each system collects, uses, disseminates, and maintains, please refer to the system PIAs listed in Appendix A, and available at www.dhs.gov/privacy.

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

Most of the information in USCIS systems is derived from data provided by the benefit requestor or beneficiary on the completed immigration form and documentation in support of his or her benefit request. USCIS staff may also manually enter case status and adjudicative decision information into USCIS systems. USCIS systems may also receive information from interconnected internal and external systems. Please see the respective USCIS case management system PIA to learn more about the internal and external system interconnections.

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, although the source systems may use commercial or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

USCIS collects information primarily from the benefit requestor or beneficiary or his or her representative; therefore it is assumed to be accurate. To ensure manually entered data is accurate, all USCIS data entry personnel can review and edit information prior to and after its submission. USCIS personnel verify the accuracy by comparing information provided by the individual with information contained in the individual's A-File and from other internal and external systems. USCIS also verifies data accuracy with the benefit requestor or beneficiary during the interview process. USCIS personnel can correct and edit inaccuracies at any stage of the process. Additionally, if the benefit requestor or legal representative identifies any data discrepancies, the individual may request amendment of their records as outlined in Section 7 Redress.



2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USCIS will manually input data incorrectly.

Mitigation: USCIS has mitigated this risk by developing separate, detailed Standard Operating Procedures (SOP) for handling information provided by benefit requestors on each USCIS form. These SOPs include detailed quality control reviews that help to ensure that the information has been accurately transferred from the paper forms submitted by individuals into the associated case management systems. These procedures ensure that all data fields are completed and describe how data entry personnel handle inconsistencies during data entry. The SOPs cover every stage of data entry from the time the envelope is opened until the time the data entered and saved into the associated case management systems. USCIS allows applicants to make changes to their information in the associated case management systems during the application analysis and case management process. If an applicant later determines that a transcription error occurred during the data input process, the individual may contact the USCIS office where the application was filed and request correction. In addition, USCIS mitigates this risk by accepting some applications electronically in order to remove the possibility of data transcription errors. This mitigation is further discussed in the above-mentioned case management system PIAs.

Privacy Risk: There is a risk that the benefit requestor, representative, form preparer, and/or interpreter provides inaccurate information.

Mitigation: USCIS mitigates this risk by collecting information primarily from the benefit requestor or his or her representative so that the most current and accurate information about the benefit requestor and beneficiary is available to USCIS. The aforementioned individuals are required to sign a statement certifying, under penalty of perjury, that the information included in the benefit request form and any submitted document are complete, true, and correct. In order to verify the information provided by the benefit requestor or representative, USCIS performs necessary background and national security checks. USCIS personnel may also check other sources to verify information provided by the benefit requestor or representative. The information verification process is further discussed in the respective case management system PIAs.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

USCIS provides CISOMB access to USCIS systems to (1) assist individuals and employers with resolving problems with USCIS; (2) identify areas in which individuals and employers have problems in dealing with USCIS; and (3) propose changes to mitigate those problems.



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.

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

No.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that information may be used outside of the original purpose for collection, which is to determine benefit eligibility.

Mitigation: This risk is mitigated. An individual or employer engages with the CISOMB because he or she is experiencing issues with a pending case at USCIS that the individual was unable to resolve directly with USCIS. CISOMB inquires with USCIS about the issue and waits for USCIS to notify CISOMB that it has taken action to resolve the issue. Additionally, CISOMB does not inquire with USCIS about an individual or employer's case without the applicant's or petitioner's consent.

All records are protected from unauthorized access and use through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. USCIS limits access to PII by employing role-based access. All CISOMB employees and contractors are thoroughly trained regarding the use of the database and the sensitivity of the information. Additionally, all CISOMB employees and contractors are required take the annual security and privacy awareness training.

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.

USCIS provides general notice to individuals through the publication of this PIA. Notice is also provided through DHS/CISOMB/PIA-001 Virtual Ombudsman System²⁴ and

²⁴ See DHS/CISOMB/PIA-001 Virtual Ombudsman System, available at www.dhs.gov/privacy.



DHS/CISOMB-001 Virtual Ombudsman System of Records.²⁵ Both can be found at www.dhs.gov/privacy. Additionally, a Privacy Act Statement is available to the individual or employer at the point of collection on both the CISOMB web and paper Form 7001, *Case Assistance Form*.²⁶ The Privacy Act Statement covers the authority, purpose, routine uses, and effects on the individual or employer as it relates to the collection. Additional information about this process, including Frequently Asked Questions (FAQ), is available on the USCIS and CISOMB webpages.

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 7001, *Case Assistance Form* to CISOMB. Form 7001 includes a Privacy Act Statement, which informs individuals that providing their information is voluntary. A customer can choose to decline to provide information; however, that may prevent the customer from receiving case assistance from CISOMB.

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk related to notice. CISOMB provides individuals, employers and representatives with a Privacy Act Statement before they submit any information to CISOMB and all actions are taken with the individual's consent. USCIS is providing general notice through the publication of this PIA.

Section 5.0 Data Retention by the project

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

USCIS provides CISOMB read-only access to the USCIS systems. For requests for information, CISOMB retains reports for business purposes and then destroys them when no longer needed in accordance with NARA's General Record Schedule 20, Item 16. Additionally, CISOMB must destroy or return any copies of A-Files, T-Files or receipt files once its research is completed.

5.2 Privacy Impact Analysis: Related to Retention

CISOMB maintains the information necessary to provide case assistance including information maintained when researching and writing recommendations in accordance with

²⁵ DHS/CISOMB-001 Virtual Ombudsman System of Records, 75 FR 18857 (April 13, 2010).

²⁶ The Form 7001, Case Assistance Form and corresponding instructions (including the Privacy Notice) are available at <https://www.dhs.gov/publication/form-dhs-7001-instructions>.



NARA's General Record Schedule 20, Item 16. CISOMB retains and retires data used to formulate recommendations through the General Record Schedule N1-563-08-001 until superseded by the CISOMB Records Schedule DAA-0563-2017-0003 currently under review by NARA.

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 info

Not applicable. This PIA examines the information sharing between USCIS and CISOMB, both of which are internal DHS components.

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

Not applicable. This PIA examines the information sharing between USCIS and CISOMB, both of which are internal DHS components.

6.3 Does the project place limitations on re-dissemination?

Not applicable. This PIA examines the information sharing between USCIS and CISOMB, both of which are internal DHS components.

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

Not applicable. This PIA examines the information sharing between USCIS and CISOMB, both of which are internal DHS components.

6.5 Privacy Impact Analysis: Related to Information Sharing

There is a minimal privacy risk related to external information sharing because CISOMB does not share case related information outside of DHS.

Section 7.0 Redress

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

The individual interaction with CISOMB is itself a form of redress. Individuals experiencing difficulties with the immigration benefits process are able to contact CISOMB to



request case assistance. CISOMB contacts and works with USCIS to respond to and/or resolve customer inquiries. In addition, individuals seeking to access or amend their USCIS records may file a Privacy Act (PA) or Freedom of Information Act (FOIA) request. Any individual seeking to access his or her USCIS record may submit a request to the following address:

USCIS National Records Center
Freedom of Information Act/Privacy Act Program
P.O. Box 648010
Lee's Summit, MO 64064-8010

Any individual seeking to access his or her CISOMB record may submit a request to the following address:

Office of the CIS Ombudsman
Privacy Act/FOIA
Department of Homeland Security
Mail Stop 0180
Washington, D.C. 20528

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 are able to contact CISOMB to request case assistance. CISOMB contacts and works with USCIS to respond to and resolve customer inquiries. U.S. citizens and lawful permanent residents are afforded the ability to correct information by filing a Privacy Act Amendment request under the Privacy Act. U.S. citizens, lawful permanent residents, and persons covered by the Judicial Redress Act should submit requests to contest or amend information. Individuals may direct all requests to contest or amend information to the USCIS FOIA/PA Office. Individuals must state clearly and concisely in the redress request the information being contested, the reason for contesting it, the proposed amendment, and clearly mark the envelope "Privacy Act Amendment." This would only apply to amendment of USCIS-held information. Persons not covered by the Privacy Act are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

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

USCIS notifies individuals of the procedures for correcting their information in this PIA, Privacy Notice, and the USCIS website. Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. The Privacy



Notice, including notice of an individual's right to correct information, are also contained on the instructions to immigration forms published by USCIS.

7.4 Privacy Impact Analysis: Related to Redress

There is minimal privacy risk related to redress. USCIS provides individuals with access, amendment, or correction to their records when requested through a FOIA or Privacy Act request.

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?

USCIS ensures that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

All DHS federal employees and contractors, including USCIS and CISOMB, are required to complete annual privacy and security awareness training. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (*e.g.*, SORN, Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard 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 USCIS systems and case files is provided on a need-to-know basis, which is determined by the users' respective responsibilities. CISOMB staff require access to USCIS systems to assist with requests for case assistance and to study systemic issues. CISOMB personnel with a valid need-to-know will be granted access to USCIS systems via either the USCIS My Access²⁷ online portal or via the USCIS IT Helpdesk. Likewise, once it is determined that CISOMB personnel no longer have a need-to-know, CISOMB will request that their access be immediately revoked by contacting the USCIS IT Helpdesk.

²⁷ The MyAccess application provides support for access to USCIS systems. MyAccess allows users to request access to USCIS systems, approve access requests, and review users for each system.



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?

USCIS reviews each information sharing initiative with CISOMB to ensure such practices are compatible with the legal authority in which USCIS fulfills its mission. USCIS has a formal review and approval process in place for new information sharing access agreements. Any new use of information and/or new access requests for the system must go through the USCIS change control process and must be approved by the proper authorities of this process, such as the USCIS Privacy Officer, Chief of Information Security Officer, Office of Chief Counsel, and the respective Program Office.

Responsible Officials

Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services
Department of Homeland Security

Stacy Shore
Acting Deputy Director
Office of the Citizenship and Immigration Services Ombudsman
Department of Homeland Security

Approval Signature

[Original, signed copy complete and on file with the DHS Privacy Office]

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security



APPENDIX A: USCIS Systems with CISOMB Access

- **Change of Address System (AR-11)**²⁸ which tracks address changes submitted to the Department of Homeland Security (DHS) in paper and electronic form as required by Section 265 of the Immigration and Nationality Act (INA), 8 U.S.C. 1305.
- **Central Index System (CIS 2)**²⁹ which serves as a DHS-wide index used to track the history of an immigrant and nonimmigrant in the adjudication process, as well as the location of immigration case files.
- **Computer Linked Application Information Management System (CLAIMS 3)**³⁰ which is used to manage the adjudication process for most domestically-filed, paper-based, immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status.
- **Computer Linked Application Information Management System (CLAIMS 4)**³¹ which is used to process applications for naturalization and citizenship.
- **Interim Case Management System (ICMS)**³² which is the web-based front-end to CLAIMS 3. ICMS is used to review, modify, and track the adjudication performed by USCIS personnel of benefit request forms.
- **National File Tracking System (NFTS)**³³ which allows DHS to track and log the movement of paper and electronic immigration case files in a centralized database, and provide timely and accurate access to the immigration case file location.
- **Global (not an acronym)**³⁴ which is a comprehensive case management tool that enables USCIS to handle and process applications for asylum pursuant to Section 208 of INA and applications for suspension of deportation or special rule cancellation of removal pursuant to NACARA § 203.
- **Person Centric Query System (PCQS)**³⁵ which allows users to submit a single query and view all transactions involving an immigrant or nonimmigrant across multiple DHS and external systems. PCQS returns a consolidated view of the individual's past interactions

²⁸ See DHS/USCIS/PIA-018 Alien Change of Address Card (AR-11), available at www.dhs.gov/privacy.

²⁹ See DHS/USCIS/PIA-009 Central Index System (CIS), available at www.dhs.gov/privacy.

³⁰ See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at www.dhs.gov/privacy.

³¹ See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS) 4, available at www.dhs.gov/privacy.

³² See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at www.dhs.gov/privacy.

³³ See DHS/USCIS/PIA-032 NFTS, available at www.dhs.gov/privacy.

³⁴ See DHS/USCIS/PIA-027(c) USCIS Asylum Division, available at www.dhs.gov/privacy.

³⁵ See DHS/USCIS/PIA-010 Person Centric Query Service, available at www.dhs.gov/privacy.



with DHS Components and other agencies as he or she passed through the U.S. immigration system.

- **USCIS Electronic Immigration System (USCIS ELIS)**³⁶ which is an electronic case management system that allows USCIS to process certain immigration benefit requests.
- **Validation Instrument for Business Enterprise (VIBE)**³⁷ which is used to (1) validate the business operations and financial viability of organizations seeking to employ foreign workers; and (2) identify benefit fraud based on the Fraud Detection and National Security Directorate (FDNS) findings and other government agencies' referrals.

³⁶ See DHS/USCIS/PIA-056 USCIS ELIS, available at www.dhs.gov/privacy.

³⁷ See DHS/USCIS/PIA-044 VIBE, available at www.dhs.gov/privacy.