Privacy Impact Assessment
for the

Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)

DHS/USCIS/PIA-023(a)

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Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) uses the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR) to streamline access to relevant information necessary to administrate the Immigration and Nationality Act. eCISCOR is a repository that consolidates information collected during the adjudication of applications and petitions for immigration benefits. USCIS is updating and reissuing this Privacy Impact Assessment (PIA) to clarify eCISCOR's functionalities and to discuss all source systems and interconnected systems to eCISCOR. USCIS replaces and retires DHS/USCIS/PIA-023 eCISCOR PIA upon publication of this PIA.

Overview

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) collects, tracks, and stores large amounts of information related to administering and processing benefit requests for all immigrant and nonimmigrant benefits. The USCIS Office of Information Technology (OIT) developed the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR) to consolidate and manage immigration and naturalization information from several USCIS data systems to reduce the labor involved in accessing, reporting, and sharing information and to improve connectivity between USCIS systems. eCISCOR serves as an intermediary database for current read-only application systems that require access to immigration and naturalization data. As an intermediary database, eCISCOR supports workflow management, performance measurement, and information sharing requests from external users. Further, consolidating multiple data systems into one centralized repository makes it easier to secure, manage, monitor, and preserve the accuracy of immigration and naturalization data. eCISCOR is an Enterprise Data Warehouse and Operational Data Store that supports three primary functions: data retrieval, data storage, and data dissemination and transaction reporting.

Data Retrieval

eCISCOR retrieves and displays an exact copy of USCIS information from connected source systems.[1] eCISCOR displays source system information in a read-only format to enforce system integrity. eCISCOR replicates many data elements about an applicant from the source systems including: name, alias, alien number (A-Number), address, gender, marital status, date of birth, country of birth, country of nationality, ethnic origin, religion, Social Security number (SSN), personal characteristics, and criminal history record. eCISCOR only receives biographic information from the source systems; biometrics such as photographs are not retrieved. eCISCOR retrieves data from the source systems on a daily basis to ensure the accuracy and completeness of

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[1] *See* Appendix A for a full list of connected source systems.

data. This allows USCIS to preserve the integrity and accuracy of the information derived from USCIS source systems.

Appendix A lists the source systems from which eCISCOR retrieves information. USCIS will update this appendix as USCIS adds or removes systems.

Data Storage

In addition to retrieving data from source systems, eCISCOR is a data repository for USCIS systems that currently do not have a repository function of their own or systems that USCIS previously decommissioned and replaced with another system.[2] Although a system's functionality may be replaced by another system, USCIS may need to access the data from the decommissioned system in instances in which the data has not been transferred to the replacement system.

eCISCOR retains the archived data in accordance with the records retention policies for the source systems. The data storage component of eCISCOR also implements rules to ensure that data elements are stored in a uniform format across source systems. For example, if one system records SSNs with dashes and another system records SSNs without dashes, eCISCOR will conform the data elements to eCISCOR's formatting rules.

Data Dissemination and Transaction Reporting

eCISCOR also sends data to USCIS systems.[3] When queried, eCISCOR sends data, including transaction and reporting data about USCIS source systems, to an interconnected USCIS system. The receiving system uses the data for mission-related operations, such as adjudicating a benefit, detecting fraud, and scheduling an immigration appointment. eCISCOR reduces the need to access multiple systems to conduct a query. The interconnection between eCISCOR and USCIS systems allow personnel to obtain source system data without affecting the performance of the source system. eCISCOR interfaces with multiple USCIS systems to assist in performing various functions such as reporting, statistical analysis, and adjudications. Because eCISCOR is a data repository that sends information to other USCIS systems for use by end-users, it does not itself have day-to-day users.

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?

Section 103 of the Immigration and Nationality Act (INA) authorizes eCISCOR to retrieve and store information.[4]

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[2] *See* Appendix B for a full list of operational and decommissioned systems that use eCISCOR to store data.
[3] *See* Appendix C for a full list of systems to which eCISCOR sends information.
[4] *See* 8 U.S.C. § 1103.

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

eCISCOR replicates and stores data from several USCIS systems. USCIS covers eCISCOR through the SORN for each source system from which it collects data.

The appendices to this PIA list the applicable SORN for each USCIS system to which eCISCOR connects.

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

Yes. USCIS completed a system security plan for eCISCOR, which was last updated on July 2, 2014. eCISCOR will no longer receive an Authority to Operate but instead has been placed in Ongoing Authorization (OA), which means that eCISCOR security controls and organizational risks are assessed and analyzed at regular intervals (that vary by security control) to support risk-based security decisions. New privacy controls issued by NIST are not impacted by OA.

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

eCISCOR follows the retention schedules for each source system. Please see appendices for source system retention schedules.

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.

eCISCOR is not subject to PRA requirements because it only collects information from other systems. Information from source systems may be subject to the PRA.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

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

eCISCOR replicates the source system data elements and sends the data to interconnected systems. eCISCOR also acts as a repository for both operational and decommissioned USCIS systems. As a multi-tier data repository, eCISCOR receives, maintains, and disseminates a large

amount of information including:

- **Names:** first, middle or initial, family, aliases, maiden, current and prior spouse(s), child(ren), person who prepared the form (e.g., attorney, preparer or representative);

- **Addresses:** home, current and prior spouse's, children's, applicant's e-mail, person who prepared the form, applicant's/spouse's employer;

- **Telephone Numbers:** applicant's or form preparer's telephone number;

- **Birth Information:** applicant, spouse, and children's birth dates, and country of birth;

- **SSN:** SSNs for applicable applicants and current spouses;[5]

- **Citizenship/Nationality Information:** applicant or spouse's race or country of nationality, date current spouse obtained citizenship, place spouse became a citizen;

- **Information Regarding Immigration Status:** A-Number, passport number, receipt number of applicant and dependents, and dates the applicant entered into and exited from the U.S. (days spent outside the U.S., trips outside the U.S.);

- **Marital Status/Family Information:** current and prior marriages or prior separations, prior spouse(s), date of marriage or divorce, number of marriages for applicant and spouse, reason prior marriage ended, whether applicant has ever been married to multiple persons at the same time, and family information (e.g., number of children);

- **Personal Characteristics:** hair color, eye color, height, gender, weight, languages spoken;

- **Tax Payment and Financial Information:** failure to pay taxes; owed taxes; claimed non-resident status for tax purposes; failure to file taxes because of nonresident status; applicant and spouse's earnings per week; amount in bank accounts; value of vehicles, real estate, and others assets; parents' estimated assets and weekly earnings;

- **Employment Information:**[6] place and address of employment or occupation, type of work, employer name, employer identification number, length of employment, and spouse's place of employment;

- **Case management records**: National File Tracking System (NFTS)[7] file location result;

- **Criminal history record (RAP Sheet)**: RAP sheet text, Federal Bureau of

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[5] eCISCOR does not automatically expose the SSN fields to eCISCOR users unless there is a business need that requires access to the SSN field.

[6] eCISCOR has the capability of processing employment information both relating to the applicant and of commercial entities who have filed petitions on behalf of workers.

[7] DHS/USCIS/PIA-032 National File Tracking System (NFTS), *available at* www.dhs.gov/privacy.

Investigation Number, Office of Biometric Identity Management (OBIM)[8] Encounter ID, OBIM Enumerator, True/False indicator stating whether the RAP Sheet text contains crimes against a minor; and

- **Military and Selective Service Information:** information evidencing Selective Service registration and military service (e.g., Selective Service number, date of registration, application for military exemption, military branch, willingness to bear arms for the U.S.)

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

eCISCOR collects and maintains immigration and naturalization information replicated from the source and interconnected systems listed in the Appendices to this PIA. Generally, most of the information in these systems comes from the immigration application that the applicant submits when seeking an immigration benefit.

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

eCISCOR uses a commercial source, Informatica AddressDoctor, to standardize the address data for addresses contained in eCISCOR. Informatica AddressDoctor is a formatting tool and does not provide any data to USCIS. This ensures that any information retained in or disseminated by eCISCOR is consistent. Furthermore, some of the eCISCOR source systems may collect, use, or maintain information obtained from commercial sources or publicly available information. For example, eCISCOR acts as the data repository for the Validation Instrument for Business Enterprises (VIBE). VIBE collects commercially available data about companies from Dun and Bradstreet (D&B).[9]

2.4   Discuss how accuracy of the data is ensured.

eCISCOR depends on the accuracy and quality of information from each source system. eCISCOR ensures the accuracy of the data by collecting the information directly from the source systems, which contain data typically collected directly from the individual applying for an immigration benefit.

eCISCOR also receives updates from the source system on a daily basis. eCISCOR has a refresh function to ensure the completeness of data within eCISCOR. The refresh function

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[8] OBIM is an office within DHS's National Protection and Programs Directorate. OBIM provides biometric identification services that help federal, state, and local government decision makers accurately identify the people they encounter and determine whether those people pose a risk to the United States. For more information, *see* http://www.dhs.gov/obim.

[9] *See* DHS/USCIS/PIA-044 VIBE, *available at* www.dhs.gov/privacy.

identifies and captures any changes to data within a source system and updates this information in eCISCOR daily. This updated information includes any changes made to the data by the individual applicant as he or she proceeds through the adjudication process. The source system PIAs detail the opportunities that individuals have to correct their PII during the immigration and naturalization process.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that eCISCOR maintains an excess of USCIS data.

Mitigation: eCISCOR transfers data from nearly all USCIS live transaction systems. Due to the age of many legacy USCIS live transaction systems, USCIS requires eCISCOR, and other backend storage systems, to reduce the labor and system strain involved in accessing, reporting, and sharing information between USCIS systems. Though all USCIS data is collected for a similar purpose of immigration benefit adjudication, due to USCIS reliance on older live transaction systems, the risk of overcollection of USCIS data by backend storage and reporting systems cannot be mitigated.

Privacy Risk: There is a risk that the data that eCISCOR sends and receives is inaccurate.

Mitigation: eCISCOR depends on the accuracy and quality of information provided by source systems. USCIS updates source system data maintained in eCISCOR daily to capture data changes. This process reduces the risk of data discrepancies between eCISCOR and the source systems. In addition, eCISCOR access is limited to read-only connectivity, to preserve the integrity and accuracy of the information derived from USCIS systems.

Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

3.1 Describe how and why the project uses the information.

eCISCOR uses information to support the other USCIS systems to which it connects. There are no day-to-day users of eCISCOR. USCIS uses the information maintained by eCISCOR for reporting, statistical analysis, and adjudication purposes. Only a limited number of authorized USCIS employees have access to the back-end functionality of eCISCOR to maintain the system.

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. There are no day-to-day users of eCISCOR.

3.4   <u>Privacy Impact Analysis</u>: Related to the Uses of Information

<u>Privacy Risk</u>: There is a risk that eCISCOR users may inappropriately access information from source systems without a need-to-know.

<u>Mitigation</u>: eCISCOR is a repository of data for the purpose of reporting and archiving. There is no direct access to eCISCOR other than for system administrator purposes. To access eCISCOR information, users must access the information by accessing an interconnected system (see Appendix C for a list of all interconnected systems). For example, if a user has access to the Person Centric Query System (PCQS)[10] he or she is able to access eCISCOR data through PCQS. Users may only access the archived data in eCISCOR through the interconnected systems. To ensure these access controls, USCIS executes an Interface Control Agreement between eCISCOR and each connected system to define the data the connected system may retrieve from eCISCOR.

eCISCOR has few dedicated users and is hosted in a separate location from all source systems. Only administrators have access to all information within eCISCOR for system maintenance purposes.

Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

eCISCOR does not provide specific notice prior to the collection of information because eCISCOR is not the original point of collection. USCIS provides general notice to individuals

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[10] DHS/USCIS/PIA-010 Person Centric Query Service (PCQS), *available at* www.dhs.gov/privacy.

through a Privacy Act Statement on all USCIS forms' instructions, which is the original point of collection. This PIA, associated source system PIAs, and SORNs listed in the appendices to this PIA also provide notice.

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

On benefit request form instructions, USCIS provides applicants seeking USCIS benefits with a Privacy Act Statement. The Privacy Act Statement details the authority and uses of information. USCIS notifies the applicant on the benefit request form that he or she may decline to provide the requested information. However, failure to provide the requested information may delay a final decision or result in the denial of the applicant's benefit request. On each benefit request form, USCIS includes a release authorization statement that requests the applicant's signature to permit USCIS to release any information from the applicant's records necessary to determine eligibility for the requested benefit.

4.3 <u>Privacy Impact Analysis</u>: Related to Notice

Privacy Risk: Because eCISCOR is not the source system of collection, there is a risk that individuals will not receive notice of the purpose for which eCISCOR uses their information.

Mitigation: USCIS provides the individual a Privacy Act Statement at the original point of collection through the publication of this PIA, and the applicable SORN(s).

Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

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

USCIS retains data derived from all existing USCIS systems in accordance with data retention schedules specific to those systems. eCISCOR will eventually retain a collection of all legacy USCIS system data as a read-only copy as legacy systems are decommissioned. Source system records retention schedules will remain in effect as systems are decommissioned.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk eCISCOR may maintain PII for a period longer than necessary to achieve agency objectives.

Mitigation: USCIS mitigates this risk by following the NARA-approved retention schedule for each source system's data (including archived or decommissioned systems) even though eCISCOR maintains the data. The schedules proposed and approved by NARA for each

source system match the requirements of the Federal Records Act and the stated purpose and mission of the system. USCIS and NARA carefully negotiated the times in the source systems' NARA schedules to ensure that USCIS retains data for the minimum time needed to process the application and make the information available for other USCIS benefits that an applicant might seek.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government, and private sector entities.

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.

Yes, USCIS uses eCISCOR to fulfill requests for information from the source interconnected systems to reduce resource strain on those front end processing systems. To respond to requests, USCIS shares data from eCISCOR externally on an ad hoc basis consistent with the routine uses covered by the applicable source system SORN. If there is a valid need to share the eCISCOR data externally, such as responding to an external federal agency's Request for Information for a law enforcement purpose, USCIS shares the data through a Computer Readable Extract (CRE).[11] If USCIS approves an ad hoc CRE, USCIS and the receiving entity adhere to the DHS 4300A Sensitive System Handbook - Attachment S1 - Managing CREs containing Sensitive Personally Identifiable Information (PII).[12]

USCIS may also share information maintained by eCISCOR if an external agency has access to a system that connects with eCISCOR. Please refer to the source system PIAs for more information on external sharing.

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

eCISCOR itself does not share information externally. Access to eCISCOR is limited to USCIS systems. Any information sharing with other entities is completed through the source systems from which eCISCOR information is derived or through the ad hoc CRE process. Each eCISCOR source system has a corresponding SORN.

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[11] DHS defines ad hoc CREs as unplanned, one-time data retrieval events created in response to a specific need for information and not otherwise previously authorized by management or covered in the source system's security plan or by an established Information Sharing and Access Agreement (ISAA).
[12] *See* DHS Sensitive Systems Policy Directive 4300A (2014).

6.3 Does the project place limitations on re-dissemination?

eCISCOR itself does not share information externally. eCISCOR does not, as a system, re-disseminate information. However, in some instances, USCIS may share eCISCOR data through a CRE, and the Requesting Entity may incorporate the eCISCOR records into its own Privacy Act System of Records. If this occurs, the Requesting Entity may share such information in accordance with the provisions of the Privacy Act of 1974, as amended, including, as appropriate, sharing with Requesting Entity personnel who have an official need to know the information, and sharing pursuant to the routine uses in the applicable SORN published by Requesting Entity.

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

eCISCOR extracts data from individual source systems to respond to requests for information. eCISCOR is not a system of record and therefore does not maintain a record of disclosures. USCIS maintains a record of disclosure via the USCIS source system or via the USCIS CRE process.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the data shared externally from the USCIS source systems via an eCISCOR extract may be inaccurate since eCISCOR is not the primary source system of USCIS data.

Mitigation: This risk can only be partially mitigated. Using a data repository such as eCISCOR protects the source system from undue resource strain, however the data is not necessarily as current as the primary source system data. USCIS uses eCISCOR to meet auditor or law enforcement requests for large extracts of information from USCIS systems. If these large extracts were performed against a live transaction system that is designed to perform real-time daily tasks for USCIS customers, the primary source system functionality would significantly decrease. This system lag would cause considerable mission disruption. Therefore, USCIS relies on the eCISCOR system to perform large data extracts. To mitigate the risk of inaccurate data within eCISCOR (and therefore, within the request for information responses), eCISCOR refreshes from the source systems on a daily basis (generally overnight). A daily refresh is the most frequent timeframe for refresh that USCIS can implement without impacting the functionality of the live transaction source systems.

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

Any individual seeking to access information maintained in eCISCOR should direct his or her request to the USCIS Freedom of Information Act (FOIA) / Privacy Act (PA) Officer at USCIS FOIA/PA, 70 Kimball Avenue, South Burlington, Vermont 05403-6813 (Human resources and procurement records) or USCIS National Records Center (NRC), P.O. Box 648010, Lee's Summit, MO 64064-8010 (all other USCIS records). The process for requesting records can be found at 6 CFR § 5.21.

As eCISCOR evolves, it will consolidate data from multiple USCIS application systems. Individuals may request access to their information by submitting a Privacy Act request.

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

eCISCOR itself does not employ any mechanisms that allow individuals to amend erroneous information. However, individuals can access and correct their information through redress procedures for individual source systems as described in the applicable source system SORN. eCISCOR maintains read-only data obtained from the source systems, and USCIS personnel cannot amend eCISCOR records directly. eCISCOR has a refresh mechanism that updates eCISCOR on a daily basis to reflect any changes in the source systems records; this refresh helps ensure timely and accurate data.

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

eCISCOR does not employ mechanisms or procedures to notify individuals on how to amend their information that may be contained within eCISCOR. eCISCOR is a repository only and receives its data from source systems via replications. USCIS corrects an individual's information by updating the source system that initially collected the information. This corrected information will then populate eCISCOR. The SORNs and PIAs for the source systems explain how individuals can correct erroneous information.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that USCIS source system owners may not afford an individual adequate opportunity to correct information transferred or stored by eCISCOR.

Mitigation: eCISCOR is not the system of record for any of its stored or transferred data. eCISCOR provides a mechanism to access and share data to and from multiple connected systems. The information accessed and retrieved by eCISCOR is obtained from connected IT systems. The underlying connected IT systems are fully responsible for any information sent to or provided by eCISCOR. It is the responsibility of the connected system owner to provide procedures for access

and redress in accordance with FOIA and the PA. Individuals may seek more information on access, redress, or correction by reviewing the SORN for the individual source system.

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

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

USCIS ensures information is used in accordance with the stated practices in this PIA by implementing security controls to safeguard PII. USCIS only grants back-end access to eCISCOR to authorized personnel on a strictly need-to-know basis. USCIS audits user access in accordance with the DHS Sensitive Systems Policy Directive.[13] The complete list of controls is included in the eCISCOR Security Plan. All the security measures are put in place to ensure that the PII in eCISCOR is accessed and used in accordance with DHS and USCIS policies and guidelines.

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

All federal employees and contractors are required to complete annual privacy awareness and computer security awareness training.

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

Only eCISCOR System Administrators, Database Administrators, and select Subject Matter Experts have direct access to eCISCOR. USCIS audits their access on an operating system level, as well as database application level. Users of interconnected systems cannot access eCISCOR directly. Rather, users access eCISCOR information through the systems to which eCISCOR provides data.

Only USCIS users with a valid need-to-know and an account can access eCISCOR's interconnected systems. If a user's account is expired or deleted, that user will not be able to log into the system through eCISCOR. All eCISCOR-connected systems have system logs that indicate successful and failed logins and details about conducted queries. These systems can also audit the list of registered users and each user's access permissions. Auditing does not include the ability to identify specific records each user can access, but audits can include the ability to identify

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[13] *See* DHS Sensitive Systems Policy Directive 4300A (2014).

the subject areas that each user accessed. Some systems conduct self-audits by reviewing logs, permissions, and access forms.

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?

eCISCOR itself does not share information outside of USCIS. USCIS may share eCISCOR data either through the USCIS source system or on an ad hoc basis. If USCIS shares information routinely though the source system, an MOU between USCIS and the receiving agency is in place. If sharing occurs on an ad hoc basis through a CRE, USCIS follows the DHS 4300A Sensitive System Handbook - Attachment S1 - Managing CREs containing SPII. Within USCIS, all of eCISCOR's information source systems (listed in the appendices to this PIA) have an Interface Control Agreement with eCISCOR itemizing each data element sent to eCISCOR.

Responsible Officials

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United States Citizenship and Immigration Services
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Approval Signature

Original signed copy on file with DHS Privacy Office.

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Department of Homeland Security

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APPENDIX A

eCISCOR Source Systems

The below source systems have a one-way connection with eCISCOR. This appendix will be updated as systems are added or removed.

- **Computer-Linked Application Information Management System 3 (CLAIMS 3)** is a case management system used to process all immigration benefits except naturalization, asylum, and refugee status.

    o **PIA:** CLAIMS 3[14]

    o **SORN:** Benefits Information System[15]

- **Computer-Linked Application Information Management System 4 (CLAIMS 4)** is an electronic case management application tracking and processing system used to process and adjudicate the Form N-400, *Application for Naturalization.*

    o **PIA:** CLAIMS 4[16]

    o **SORN:** Benefits Information System[17]

- **Central Index System (CIS)** is a system that supports a legacy Immigration and Naturalization Service's records management need to collect and disseminate automated biographic and historical information on the status of applicants seeking immigration benefits.

    o **PIA:** CIS[18]

    o **SORN:** Alien File, Index, and National File Tracking System of Records (A-File)[19]

- **Refugee, Asylum, and Parole System (RAPS)** is a system that provides case management functionality for asylum and refugee cases.

    o **PIA:** Refugees, Asylum, and Parole System and the Asylum Pre-Screening System[20]

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[14] DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, *available at* www.dhs.gov/privacy.

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

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

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

[18] DHS/USCIS/PIA-009 Central Index System (CIS), *available at* www.dhs.gov/privacy.

[19] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

[20] DHS/USCIS/PIA-027 Refugees, Asylum, and Parole System and the Asylum Pre-Screening System, *available at* www.dhs.gov/privacy.

- o **SORN:** Asylum Information and Pre-Screening[21]

- **Alien's Change of Address Form (AR-11)** tracks address changes that individuals submit using the Form AR-11.

  - o **PIA:** AR-11[22]

  - o **SORN:** Benefits Information System[23]

- **National File Tracking System (NFTS)** is used to track A-File location information.

  - o **PIA:** NFTS[24]

  - o **SORN:** A-File[25]

- **Marriage Fraud Amendment System (MFAS)** is used to process requests for the Form I-751, *Petition to Remove Conditions on Residence* and the Form I-829, *Petition by Entrepreneur to Remove Conditions.*

  - o **PIA:** CLAIMS 3[26]

  - o **SORN:** Benefits Information System[27]

- **USCIS Electronic Immigration System (USCIS ELIS)** allows individuals requesting a USCIS benefit to register online and submit certain benefit requests through the online system.

  - o **PIA:** USCIS ELIS[28]

  - o **SORNs:**

    - ▪ Benefits Information System[29]

    - ▪ A-File[30]

- **National Appointment Scheduling System (NASS)** is a national appointment scheduling system that enables USCIS to better address the demands of its existing case load and to better implement new requirements as they emerge.

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[21] DHS/USCIS-010 Asylum Information and Pre-Screening, 75 FR 409 (Jan. 5, 2010).
[22] DHS/USCIS/PIA-018 Alien Change of Address Card (AR-11), *available at* www.dhs.gov/privacy.
[23] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[24] DHS/USCIS/PIA-032 National File Tracking System (NFTS), *available at* www.dhs.gov/privacy.
[25] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).
[26] DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, *available at* www.dhs.gov/privacy.
[27] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[28] DHS/USCIS/PIA-056 USCIS ELIS, *available at* www.dhs.gov/privacy.
[29] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[30] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

- o **PIA:** NASS[31]

- o **SORNs:**

  - Background Check Service[32]

  - Biometric Storage System[33]

  - Benefits Information System[34]

  - Asylum Information and Pre-Screening[35]

- **Customer Profile Management System** (**CPMS)** provides the capability of managing and reusing biometric images.

  - o **PIA:** CPMS[36]

  - o **SORNs:**

    - Biometric Storage System[37]

    - Background Check Service[38]

- **Enterprise Service Bus (ESB) - Department of the Treasury (DOT) Transaction Reporting System (TRS), Pay.gov** interconnection sends eCISCOR payment status information from DOT Financial Management Service for USCIS benefit requests through the USCIS ESB. eCISCOR contains a Payment Mart within the data warehouse that allows report generation for the USCIS Financial Management Division from USCIS ELIS, CLAIMS 3, and CLAIMS 4.

  - o **PIA:** ESB[39]

  - o **SORN:**

    - General Information Technology Access Account Records System (GITAARS)[40]

- **Service Request Management Tool (SRMT)** provides USCIS Customer Service officers the ability to record and resolve Service Requests (SR) from customers. It also allows

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[31] DHS/USCIS/PIA-057 National Appointment Scheduling System, *available at* www.dhs.gov/privacy.
[32] DHS/USCIS-002 Background Check Service, 72 FR 31082 (June 5, 2007).
[33] DHS/USCIS-003 Biometric Storage System, 72 FR 17172 (Apr. 6, 2007).
[34] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[35] DHS/USCIS-010 Asylum Information and Pre-Screening, 80 FR 74781 (Nov. 30, 2015).
[36] DHS/USCIS/PIA-060 Customer Profile Management Service (CPMS), *available at* www.dhs.gov/privacy
[37] DHS/USCIS-003 Biometric Storage System, 72 FR 17172 (Apr. 6, 2007).
[38] DHS/USCIS-002 Background Check Service, 72 FR 31082 (June 5, 2007).
[39] DHS/USCIS/PIA-008 Enterprise Service Bus, *available at* www.dhs.gov/privacy.
[40] DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).

USCIS to respond directly to the customer with an update on their case or provide steps to the customer of what may be required to resolve the issue.

  o **PIA:** Customer Relationship Interface System[41]

  o **SORN:** Benefits Information System[42]

- **Asylum Pre-Screen System (APSS)** allows USCIS to track and manage casework, schedule interviews, update relevant findings and decisions, generate reports, and assess the effectiveness of the Asylum Pre-Screen System. The system captures case data, tracks case support, a control case interviews, and generates management and statistical reports.

  o **PIA:** Refugees, Asylum, and Parole System and the Asylum Pre-Screening System[43]

  o **SORN:** Asylum Information and Pre-Screening System of Records[44]

- **FD-258 Mainframe**, system was established to meet the USCIS requirement to track fingerprint information both to and from the Federal Bureau of Investigation (FBI). The FD258 MF system maintains information on the fingerprint status of individual applicants.

  o **PIA:** CLAIMS 3[45]

  o **SORN:** Benefits Information System[46]

- **Private Attorney Maintenance System (PAMS)** stores the detail of attorney information and the Attorney ID, a nine-byte value that uniquely identifies the attorney. The Attorney ID is used to retrieve attorney data for purposes of display in RAPS and for creating attorney copies of all correspondence with the applicant. APSS looks up names and addresses of Attorneys IDs

  o **PIA:** Refugees, Asylum, and Parole System and the Asylum Pre-Screening System[47]

  o **SORN:** Asylum Information and Pre-Screening System of Records[48]

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[41] DHS/USCIS/PIA-019 Customer Relationship Interface System, and all associated updates, *available at* www.dhs.gov/privacy.
[42] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[43] DHS/USCIS/PIA-027 Refugees, Asylum, and Parole System and the Asylum Pre-Screening System, *available at* www.dhs.gov/privacy.
[44] DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 75 FR 409 (Jan. 5, 2010).
[45] DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, *available at* www.dhs.gov/privacy.
[46] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[47] DHS/USCIS/PIA-027 Refugees, Asylum, and Parole System and the Asylum Pre-Screening System, *available at* www.dhs.gov/privacy.
[48] DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 75 FR 409 (Jan. 5, 2010).

- **Service Center CLAIMS** (**SCCLAIMS**) system was developed to analyze applications for immigration benefits in CLAIMS3. It is used in FDNS field offices to search CLAIMS3 data for possible discrepancies, identify applicants whose names are on national security and public safety lists, and identify possible fraudulent applicants before they are adjudicated.

  - **PIA:**
    - FDNS Directorate PIA[49]
    - FDNS-Data System PIA[50]
    - CLAIMS 3 PIA[51]

  - **SORN:**
    - FDNS SORN[52]
    - A-File SORN[53]

[49] DHS/USCIS/PIA-013-01 Fraud Detection and National Security Directorate (FDNS) *available at* www.dhs.gov/privacy.
[50] DHS/USCIS/PIA-013(a) Fraud Detection and National Security – Data System (FDNS-DS) *available at* www.dhs.gov/privacy.
[51] DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems *available at* www.dhs.gov/privacy.
[52] DHS/USCIS-006 Fraud Detection and National Security Records (FDNS), 77 FR 47411 (Aug. 8, 2012).
[53] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

APPENDIX B

Data Storage in eCISCOR

eCISCOR serves as a data repository for the following operational and decommissioned systems:

Operational Systems

- **ESB Validation Instrument for Business Enterprises (VIBE)** – ESB VIBE is used alongside CLAIMS 3 case processing of employment-based benefits to validate the eligibility of an employer filing for employment-based immigration benefits and to ensure that companies are not misrepresenting themselves for the purposes of defrauding USCIS. eCISCOR is the data repository for VIBE.

    o **PIA:** Validation Instrument for Business Enterprises[54]

    o **SORNs:**

        ▪ A-File[55]

        ▪ Fraud Detection and National Security Records (FDNS)[56]

        ▪ Benefits Information System[57]

    o **Retention Schedule:** Under development. VIBE will store and maintain the records of VIBE Status Report's and other data indefinitely until a NARA appraisal is completed. USCIS is proposing a retention of 15 years.

- **ESB USCIS International Visa Project** – The project allows USCIS to collect biometrics of individuals seeking immigration benefits from a participating country who are currently physically present in the United States. This prevents the applicant from having to travel to the participating country to provide this information. eCISCOR stores transactional data on behalf of the USCIS International Visa Project.

    o **PIA:** USCIS International Visa Project[58]

    o **SORN:** Not applicable

    o **Retention Schedule:** eCISCOR does not store any applicant data from the International Visa Project. USCIS only retains the transactional data in accordance with the DHS Sensitive Systems Policy Directive, which states, "Audit trail records must be maintained online for at least 90 days, thereby allowing rapid access to

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[54] DHS/USCIS/PIA-044 Validation Instrument for Business Enterprises, *available at* www.dhs.gov/privacy.
[55] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).
[56] DHS/USCIS-006 Fraud Detection and National Security Records (FDNS), 77 FR 47411 (Aug. 8, 2012).
[57] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[58] DHS/USCIS/PIA-048 USCIS International Visa Project, *available at* www.dhs.gov/privacy.

recent information. Audit trails should be preserved for a period of seven years as part of managing records for each system to allow audit information to be placed online for analysis with reasonable ease."[59] This is the standard retention period specified by DHS Security Authorization policy for system audit data.

Decommissioned Systems in the eCISCOR data repository

- **Adjudication Tracking System (ATS):** ATS system was used to track adjudications for individuals applying for immigration benefits. ATS provided functionality to define and manage resources available for adjudications, records management, scheduling appointments, and reporting. ATS was decommissioned and is in read-only mode. However, eCISCOR acts as a data repository for the decommissioned data and continues to follow the ATS Retention Schedule previously approved by NARA (N1-566-09-04). This retention schedule requires USCIS to retain the information for 10 years after the last completed action.

- **InfoPass:** InfoPass allowed public users to schedule and manage appointments with immigration officials through the use of a web-based client interface application. USCIS personnel used InfoPass for administrative purposes. InfoPass data was migrated to the NASS in June 2016. A copy of the data will be given to the InfoPass System Owner for archiving. InfoPass was decommissioned in August 2016.

  o **PIA:** Customer Scheduling and Services[60]

  o **SORNs:**

    - GITAARS[61]

    - Benefits Information System[62]

- **Parole Case Tracking System (PCTS):** PCTS was a casework data entry and tracking for both Significant Public Benefit Paroles (SPBP) and Humanitarian Paroles (HP). PCTS has been decommissioned and is in read only mode. The PCTS has been replaced by Case and Activity Management for International Operations (CAMINO).[63] Although CAMINO replaces the PCTS functionality, eCISCOR acts as a data repository for the decommissioned data and continues to follow the PCTS Retention Schedule previously approved by NARA (N1-566-08-06). This retention schedule requires USCIS to retain the information for 25 years after the final decision on the case.

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[59] *See* DHS Sensitive Systems Policy Directive 4300A (2014).
[60] DHS/USCIS/PIA-046 Customer Scheduling and Services, *available at* www.dhs.gov/privacy.
[61] DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).
[62] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[63] DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), *available at* www.dhs.gov/privacy.

- **Reengineered Naturalization Application Casework System (RNACS):** RNACS was used to process and track applications associated with naturalization and/or citizenship. eCISCOR previously had an interconnection to the RNACS, which has now been decommissioned. eCISCOR acts as a data repository for the decommissioned data and continues to follow the RNACS Retention Schedule previously approved by NARA (N1-566-08-15). This retention schedule requires USCIS to retain the information for 15 years after the last completed action.

- **Scheduling and Notification of Applicants for Processing (SNAP):** SNAP automatically scheduled appointments for immigration benefits for applicants and petitioners to submit biometric information to USCIS. SNAPs functionality has been replaced by NASS. However, eCISCOR acts as a data repository for the decommissioned data and continues to follow the SNAP Retention Schedule previously approved by NARA (N1-566-08-19). This retention schedule requires USCIS to retain the information for 15 months after the last recorded action.

    o **PIA:** SNAP PIA[64]

    o **SORN:** Benefits Information System[65]

- **USCIS Electronic Immigration System 1 (Legacy) (USCIS ELIS 1)** allows individuals requesting a USCIS benefit to register online and submit certain benefit requests through the online system.

    o **PIA:** USCIS ELIS PIAs Retired

    o **SORN:** USCIS ELIS SORNs Retired

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[64] DHS/USCIS/PIA-020 USCIS Scheduling and Notification of Applicants for Processing, *available at* www.dhs.gov/privacy.
[65] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

APPENDIX C

eCISCOR as a Data Provider

eCISCOR acts as a data provider to:

- **Standard Management Analysis Reporting Tool (SMART) –** to facilitate USCIS's ability to measure production metrics. SMART users are limited to USCIS employees.

    o **PIA:** SMART[66]

    o **SORN:** SORN coverage dependent on connected IT system

- **SAS Predictive Modeling Environment (SAS PME) –** SAS PME allows USCIS to upload large amounts of data to conduct research and analysis, including predicting future circumstances that may affect USCIS operations. SAS PME enables users to manipulate, manage, store, analyze, visualize, and report on almost any data. eCISCOR provides data to SAS PME for processing and analysis.

    o **PIA:** SAS PME[67]

    o **SORN:** SORN coverage dependent on connected IT system

- **Center Adjudication System Electronic Processing (CasePro)** – assists USCIS employees with the adjudication of Temporary Protected Status (TPS), Deferred Enforced Departure (DED), and Deferred Action for Childhood Arrivals (DACA) filings. CasePro electronically organizes and reviews incoming filings, identifies approvable cases, automates the adjudication of some cases that meet filing requirements, and routes filings requiring additional review to the manual resolution process.

    o **PIA:** CasePro[68]

    o **SORN:** Benefits Information System[69]

- **Case Inventory Management System (CIMS) –** CIMS is a data mart of CLAIMS 3 data that was originally developed to allow better reporting on the C3 data. CIMS enables the creation of operational reports, specifically the current status of cases.

    o **PIA:** CLAIMS 3[70]

    o **SORN:** Benefits Information System[71]

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[66] DHS/USCIS/PIA-050 Standard Management Analysis Reporting Tool (SMART), *available at* www.dhs.gov/privacy.

[67] DHS/USCIS/PIA-055 SAS Predictive Modeling Environment (SAS PME), *available at* www.dhs.gov/privacy.

[68] DHS/USCIS/PIA-040 Center Adjudication System Electronic Processing (CasePro), *available at* www.dhs.gov/privacy.

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

[70] DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, *available at* www.dhs.gov/privacy.

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

- **ESB Person Centric Query System (PCQS)** – to support sharing initiative between the DHS, USCIS, and Department of State (DOS), Bureau of Counselor Affairs to share immigration and visa data between agencies as documented in the PIA for the USCIS Person Centric Query System published on June 22, 2007. PCQS users are limited to USCIS, DHS, and DOS employees.

  o **PIA:** PCQS[72]

  o **SORN:** SORN coverage dependent on connected IT system

- **ESB Verification Information System (VIS) –** is the technical infrastructure that enables USCIS to operate Systematic Alien Verification for Entitlements (SAVE) and E-Verify. VIS is a nationally accessible database of selected immigration status information containing in excess of 100 million records.

  o **PIA:**

    ▪ SAVE Program[73]

    ▪ E-Verify Program[74]

  o **SORNs:**

    ▪ SAVE Program[75]

    ▪ E-Verify Program System of Records[76]

- **National Benefits Center Process Workflow Repository (NPWR) –** is used for the document verification and validation process. NPWR is an electronic checklist used to determine if the applicant has submitted sufficient information to successfully adjudicate the benefit.

  o **PIA:** Intercountry Adoptions[77]

  o **SORNs:**

    ▪ Intercountry Adoptions Security[78]

    ▪ A-File[79]

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[72] DHS/USCIS/PIA-010 Person Centric Query Service (PCQS), *available at* www.dhs.gov/privacy.

[73] DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements (SAVE) Program, *available at* www.dhs.gov/privacy.

[74] DHS/USCIS/PIA-030 E-Verify Program, *available at* www.dhs.gov/privacy.

[75] DHS/USCIS-004 Systematic Alien Verification for Entitlements Program, 81 FR 78619 (Nov. 8, 2016).

[76] DHS/USCIS-011 E-Verify Program System of Records, 79 FR 46852 (Aug. 11, 2014).

[77] DHS/USCIS/PIA-007 International Adoptions, *available at* www.dhs.gov/privacy.

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

[79] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

- **Enterprise Correspondence Handling Online (ECHO) –** is a centralized data system with web-based user interfaces that replaced existing general support systems (GSS) previously used at the various data centers. USCIS Service Center personnel use ECHO to generate various types of correspondence as they process various USCIS forms.

  o **PIA:** eCISCOR[80]

  o **SORN:** Benefits Information System[81]

- **System Electronic Registration Approval (SERA)** – SERA provides an automatic process of approval TPS re-registration, previously performed manually in California Service Center. SERA has a connection to eCISCOR.

  o **PIA:** SERA[82]

  o **SORN:**

    ▪ A-File[83]

    ▪ Benefits Information System[84]

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[80] DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), *available at* www.dhs.gov/privacy.
[81] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).
[82] DHS/USCIS/PIA-058 System Electronic Registration Approval (SERA), *available at* www.dhs.gov/privacy.
[83] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).
[84] DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).