Privacy Impact Assessment
for the

System Electronic Registration Approval (SERA)

DHS/USCIS/PIA-058

September 25, 2015

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Abstract

The Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), System Electronic Registration Approval (SERA) is a web application that provides the California Service Center with the ability to automatically approve Temporary Protected Status (TPS) re-registration cases. SERA retrieves TPS re-registration cases from the Computer Linked Application Information Management System 3 (CLAIMS 3), validates each application, and categorizes cases for automatic approval or manual adjudication. With the implementation of SERA, USCIS gains efficiency in its processing procedures. USCIS is conducting this Privacy Impact Assessment to describe how SERA collects, uses, and maintains personally identifiable information.

Overview

Pursuant to 8 U.S.C. § 1254a, the Secretary of Homeland Security may designate a foreign country for Temporary Protected Status (TPS) due to conditions in the country that temporarily prevent the country's nationals from returning safely, or in certain circumstances, when the country is unable to handle the return of its nationals adequately.[1] U.S. Citizenship and Immigration Services (USCIS) may grant TPS to eligible nationals of certain designated countries (or parts of countries), who are already in the United States.[2] USCIS may also grant TPS to eligible individuals without nationality who last resided in the designated country.

During a designated period, individuals who are TPS beneficiaries or who are found preliminarily eligible for TPS upon initial review of their cases (*prima facie* eligible): (1) are not removable from the United States; (2) can obtain an employment authorization document; and (3) may be granted travel authorization. Once granted TPS, an individual also cannot be detained by DHS on the basis of his or her immigration status in the United States. TPS is a temporary benefit that does not lead to lawful permanent resident status or give any other immigration status.[3] Once granted TPS, an individual must re-register during each re-registration period to maintain TPS benefits.

Application Process

An individual seeking TPS must complete the following forms during the registration and/or re-registration period:[4]

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[1] E.g., ongoing armed conflict (such as civil war), an environmental disaster (such as earthquake or hurricane) or an epidemic, and other extraordinary and temporary conditions.

[2] For the list of TPS-designated countries, *see* http://www.uscis.gov/tps.

[3] However, registration for TPS does not prevent an applicant from applying for nonimmigrant status, filing for adjustment of status based on an immigrant petition, or apply for another immigration benefit or protection for which he or she may be eligible.

[4] TPS designation is time-bound and requires the Secretary to extend designation (re-designate) for a country's TPS status.

- Form I-821, *Application for Temporary Protected Status,* used to apply for a temporary immigration status for eligible nationals of designated countries; and

- Form I-765, *Application for Employment Authorization*, used to apply for employment authorization. USCIS requires the completion and submission of this form regardless of age because an approved I-765 provides the TPS recipient with a government-issued photo identification.

The TPS re-registration process begins when an applicant submits the above completed forms to USCIS. When USCIS receives an application, the filing package is reviewed for completeness. If the filing meets the threshold acceptance criteria, USCIS sends a notice to the applicant that contains a receipt number, which can be used to check the case status online. USCIS digitizes the hard copy application and enters the application data into the Computer Linked Application Information Management System (CLAIMS 3) for processing.[5] The USCIS Service Centers are responsible for processing TPS cases.

System Electronic Registration Approval (SERA) application

The USCIS California Service Center (CSC) uses the System Electronic Registration Approval (SERA) application to automate the TPS re-registration adjudication process.[6] SERA improves CSC operations by providing the ability to preliminarily clear TPS cases for re-registration so that the manual adjudication is not necessary when an applicant meets certain criteria for the re-registration. SERA supports the following missions of USCIS:

- assists in the adjudication of applications and petitions for immigration and citizenship benefits;
- detects immigration fraud;
- provides information and opportunities for USCIS to address customer needs; and
- ensures the integrity of the immigration system.

SERA separates TPS re-registration cases that reach a predetermined threshold of eligibility from those that do not, providing a more efficient approval process. SERA retrieves the CSC-designated re-registration TPS cases that were previously granted TPS during a former registration or re-registration period from CLAIMS 3 via the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR).[7] SERA validates each application through set rules and then produces a list of cleared and non-cleared cases for the CSC adjudicator.

Re-designation allows USCIS to accept new applications for TPS. Once granted TPS, an individual must re-register during each re-registration period to maintain TPS benefits.

[5]*See* DHS/USCIS/PIA-016 Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) PIA, *available at* www.dhs.gov/privacy.

[6] The CSC is not the only USCIS Service Center that processes TPS cases; however, the CSC is the sole user of SERA.

[7] *See* DHS/USCIS/PIA-023(a)-Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR) PIA Update dated January 23, 2015, *available at* www.dhs.gov/privacy.

SERA runs TPS cases against a pre-determined threshold to verify an applicant's identity and eligibility for TPS renewal. SERA assesses whether a case meets the pre-determined threshold by performing checks on the applicant using the Person Centric Query Service (PCQS),[8] which retrieves information from USCIS, DHS, and external connected systems. SERA uses PCQS to perform a Central Index System (CIS) Name Check, a TECS Name Check, Automated Biometric Identification System (IDENT) Check, and Federal Bureau of Investigations (FBI) Fingerprint Check.

CIS Name Check: CIS collects Alien Registration Number (A-Number) and alias information. Using PCQS, SERA compares CIS data to the data entered in CLAIMS 3 for identity verification purposes.[9]

TECS Name Check: PCQS accesses the U.S. Customs and Border Protection (CBP) TECS system to conduct a Name Check. The results of the Name Check are used to determine the applicant's eligibility for extension of TPS status.[10]

IDENT Search: An IDENT search determines if the applicant has a "hit" against derogatory information in the IDENT database.[11] PCQS connects with IDENT to facilitate this search.

FBI Fingerprint Check: USCIS conducts a FBI Fingerprint Check on applicants age 14 or older. The FBI Fingerprint Check is a search of the FBI's Next Generation Identification (NGI) to identify applicants who have an arrest record.[12] Using PCQS, SERA retrieves the fingerprint response data from the USCIS Customer Profile Management Service (CPMS)[13] via PCQS to determine benefit eligibility.[14]

SERA automatically vets pending TPS re-registration filings received by CSC to generate a queue of clear and non-clear cases. SERA users log into the system to review the accuracy of cleared and non-cleared TPS re-registration cases.

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[8] *See* DHS/USCIS/PIA-023-Person Centric Query Service (PCQS) PIA dated August 13, 2008, *available at* www.dhs.gov/privacy.

[9] 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. *See* DHS/USCIS/PIA-009 CIS PIA, dated June 22, 2007, *available at* www.dhs.gov/privacy.

[10] PCQS provides a gateway into TECS/IBIS and F258 (Fingerprints) results. *See* DHS/CBP/PIA-009 TECS System, *available at* www.dhs.gov/privacy.

[11] IDENT is a repository of biometric and associated biographic information on persons of interest, including wants and warrants from federal, state, local, tribal, and international law enforcement agencies through the FBI; Known or Suspected Terrorists; deported felons and absconders, sexual offender registrants, gang-related records, subjects who have violated U.S. immigration laws or who have been denied a biometric visa by Department of State; and other persons of interest to DHS. *See* DHS/NPPD/PIA-002 Automated Biometric Identification System, dated June 5, 2007, *available at* www.dhs.gov/privacy.

[12] The Federal Bureau of Investigation (FBI) replaced its Integrated Automated Fingerprint Identification System (IAFIS) with the NGI. The NGI contains FBI criminal history record information compiled from law enforcement and national security submitters. *See* DOJ/FBI-002 Central Records System (CRS), 66 FR 29994 (June 4, 2001).

[13] *See* forthcoming CPMS PIA *available at* www.dhs.gov/privacy.

[14] *See* DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS) for more information on FD-258 and the FBI Fingerprint Check, *available at* www.dhs.gov/privacy.

When SERA determines that all criteria on a case is met through the automated validation process, SERA marks the case as preliminary cleared and manual review is not required. SERA generates a Cleared Case report to show which cases are eligible for approval. CSC adjudicators conduct quality assurance checks on a sample of the cases to validate that all requirements for approval have been met. Cleared cases are marked "accepted" in SERA by the CSC adjudicator. Accepted cases are considered approved.

SERA generates a list of non-cleared cases if SERA determines that there is missing criteria or the case does not meet the pre-determined threshold requirements (e.g., if the above background checks produce a "hit" or a "match").[15] CSC adjudicators are required to manually review the non-cleared cases to determine if eligibility requirements are met or determine if the case must be denied.

For non-cleared cases, if the CSC adjudicator determines through manual review that the eligibility requirements are met, he or she makes corrections to resolve the issues indicated on the exception list. CSC adjudicators then mark these cases as accepted.

If through manual review the CSC adjudicator determines that he or she cannot resolve the exceptions, he or she will mark the case as "exception" and forward the case to the appropriate USCIS office for additional review (e.g., Fraud Detection and National Security Directorate if indications of fraud were found).[16] The case is marked "exception" in SERA until the case is either approved or denied.

CSC adjudicators enter the status of approved cases via an input file into a batch uploader, which feeds the final determination into CLAIMS 3 on a nightly basis. SERA transfers all filings to Enterprise Document Management System (EDMS), the electronic A-File.[17] USCIS removes all data from SERA once the case has had a final determination or after the re-registration period closes.

Reporting

SERA has reporting capabilities to help manage the TPS workload and performance of the system. Authorized CSC adjudicators may use the reporting functionality to produce reports for specific case actions. Reporting filters such as organization, filing period, and check period can be specified. Users can select either "Preliminarily Cleared" or "Finally Cleared" cases for reporting purposes.[18] CSC Supervisors and Management personnel may also use the reporting feature to monitor the progress and adjudication of TPS re-registration applications. The type of data produced is summary data on the performance of the system.

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[15] Missing criteria may include outstanding fees or more than one pending form.
[16] See DHS/USCIS/PIA-013-01 FDNS Program PIA and subsequent updates, *available at* www.dhs.gov/privacy.
[17] *See* DHS/USCIS/PIA-003(a) Integrated Digitization Document Management Program (IDDMP) PIA, dated September 24, 2013, *available at* www.dhs.gov/privacy.
[18] "Finally Cleared" refers to cases that have been approved and are ready to be manually input into CLAIMS 3.

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 244 of the Immigration and Nationality Act (INA), as amended, authorizes the collection of this information.[19]

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

SERA is covered by the DHS/USCIS-007 Benefit Information System (BIS) SORN[20] and DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN.[21]

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

Yes. SERA falls under the Digital Innovation and Development – Information Technology (DID-IT) accreditation boundary. DID-IT completed the security assessment and authorization documentation in August 2013, and was accepted into the Ongoing Authorization program. Ongoing Authorization requires DID-IT, including SERA, to be reviewed on a monthly basis and maintain its security posture to maintain its Authority to Operate (ATO).

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

USCIS is working with NARA to update and consolidate the current CLAIMS 3 retention schedules: N1-563-04-03 (CLAIMS 3) and N1-566-08-12 (CLAIMS 3 LAN). Under the proposed update retention schedule for CLAIMS 3, the system will retain records 25 years from the date of the last completed action.

TPS physical applications are transferred to EDMS, the electronic A-File after final decision. A-Files are permanent records in both electronic and paper form. USCIS transfers A-Files to the custody of NARA 100 years after the individual's date of birth. When USCIS digitizes a paper A-File, the digitized A-File maintained in EDMS becomes the official record and maintains the same retention schedule as the original paper A-File. USCIS sends the retired paper A-File to the Federal Records Center.

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[19] 8 U.S.C. §§ 244.9, 1103, 1254a, 1324a, and 1363 and 31 U.S.C. § 3512.
[20] DHS/USCIS-007 Benefit Information System (BIS), 73 FR 56596 (Sept. 29, 2008).
[21] DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN, 76 FR 34233 (Nov. 21, 2013).

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 collection of information for TPS is subject to the PRA. USCIS obtained approval from OMB for the following forms: I-821 (OMB Control number 1615-0043) and I-765 (OMB Control number 1615-0040).

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.

SERA retrieves the following information from CLAIMS 3 (via eCISCOR):

- A-number

- Full Name (First Name, Last Name)

- Date of Birth

- Country of Citizenship

- Receipt Number

- Form Type (Type of Application Filed)

- Date Application Filed

- Evidence of Fees paid

- Immediate previous TPS filing and decision

- National File Tracking System (NFTS) Location of File

USCIS uses this information to validate each application, check the application against the pre-determined threshold, and categorize the case for either automatic approval or manual review and adjudication.

SERA also collects, generates, and retains a username for the SERA user, which can be linked back to the USCIS employee or USCIS contractor that is using the system.

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

SERA retrieves information from the source system, CLAIMS 3, via eCISCOR. SERA uses the CLAIMS 3 information to run checks against CIS, TECS, IDENT, and the FBI via PCQS.[22]

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.

2.4 Discuss how accuracy of the data is ensured?

Prior to applying the pre-determined threshold rules, SERA retrieves the TPS re-registrant's application data from CLAIMS 3 (via eCISCOR). If inconsistencies exist with information previously obtained from source systems, the adjudicator conducts an additional review to evaluate the accuracy of the information.

Additionally, the CSC also has a quality control unit that reviews a statistical sampling of automatic approvals for issues in the electronic adjudication process. Assigned adjudicators take a percentage of the pre-cleared cases and conduct a manual verification to ensure that the application is functioning as designed.

2.5 <u>Privacy Impact Analysis</u>: Related to Characterization of the Information

Privacy Risk: There is a risk that the information SERA uses to conduct automatic checks may be inaccurate because SERA relies on the accuracy of information that is manually input into CLAIMS 3.

Mitigation: The accuracy of the data within SERA is reliant on the accuracy of the data in CLAIMS 3. Information in CLAIMS 3 is either electronically or manually inputted. USCIS has mitigated this risk of manually inputting inaccurate information by developing separate, detailed Standard Operating Procedures (SOPs) for handling information collected in each of the numerous USCIS forms completed by benefit requestors. 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 also instruct 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 is entered into the associated case

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[22] *See* DHS/USCIS/PIA-009 CIS PIA, dated June 22, 2007; DHS/CBP/PIA-009 TECS System; DHS/NPPD/PIA-002 Automated Biometric Identification System, dated June 5, 2007, *available at* www.dhs.gov/privacy. *See also* DOJ/FBI-002 Central Records System (CRS), 66 FR 29994 (June 4, 2001).

management systems and saved. USCIS also requires a second level review and quality assurance check to verify the accuracy of the information in CLAIMS 3 against the information on the form.

Privacy Risk: There is a risk that this system may collect inaccurate and untimely data from other systems.

Mitigation: SERA ensures the accuracy of the PII by retrieving real-time information directly from CLAIMS 3 via eCISCOR and the source systems via PCQS. The source systems have SOPs in place to correct erroneous information. Additionally, the automatic approval process undergoes a random quality assurance sampling.

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.

SERA uses the CLAIMS 3 information to run checks against CIS, TECS, IDENT, and the FBI via PCQS to identify cases that can be automatically approved versus cases that require manual review and adjudication by adjudicators.

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. Only CSC personnel (including contractors and employees) with a need-to-know can access SERA.

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

Privacy Risk: Because SERA has the ability to automatically approve TPS re-registration cases and is only used at the CSC, there is a risk that TPS re-registrants may receive a different adjudication from SERA than they would receive from manual processes at other regional service centers.

Mitigation: This risk is partially mitigated. CSC adjudicators conduct quality assurance checks on a sample of the cases to validate that all requirements for approval have been met. CSC adjudicators also have the ability to manually review any SERA case.

Privacy Risk: There is a risk of unauthorized access to SERA.

Mitigation: USCIS protects SERA from unauthorized access through administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a valid need-to-know to access the information in SERA. Access to SERA is given to a limited number of CSC personnel for the purpose of determining eligibility for TPS re-registration. Authorized employees must use their issued credentials, also known as PIV cards, to not only gain access to building but to also access SERA. Employees who do not require access to SERA, will not be able to access SERA through their PIV card. Access to the system via PIV card is consistent with the National Institute of Standards and Technology 800-63 Level 4-assurance of the user's identity.[23] Finally, USCIS deploys user logs to ensure users are only accessing information related to their job functions.

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.

Although individuals do not receive direct notice that their information will be used and maintained within SERA, USCIS provides individuals who apply for TPS benefits with a Privacy Act Statement as required by Section (e)(3) of the Privacy Act. The Privacy Act Statement details the authority to collect the requested information and outlines the intended uses. The forms also contain a provision by which an applicant authorizes USCIS to release any information received from the applicant as needed to determine eligibility for benefits. Additionally, individuals receive general notice through this PIA, CIS, PCQS, TECS, and IDENT PIAs, the DHS/USCIS-007 BIS SORN, and DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN.

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

Through the application process, individuals have consented to the use of the information submitted for adjudication purposes. Applicants who apply for USCIS benefits have an opportunity and right to decline to provide information. USCIS benefit applications require the applicant to provide biographic and/or biometric information. This information is critical in making an informed adjudication decision to grant or deny a USCIS benefit. Failure to submit such information prohibits USCIS from processing and properly adjudicating the application and thus precludes the applicant from receiving the benefit.

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[23]See NIST Special Publication (SP) 800-63-2, Electronic Authentication Guideline, dated August 2013, *available at* http://csrc.nist.gov/publications/nistpubs/800-63-1/SP-800-63-1.pdf

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk associated with notice because USCIS provides notice to individuals through an (e)(3) statement, the source system PIAs, this PIA, and the associated SORNs.

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.

TPS Re-Registration takes place generally every 18 months and is open for a period of 60 days. Once adjudicated, USCIS records the decision in CLAIMS 3 and deletes the information in SERA. USCIS retains information in SERA until the case has had a final determination or the re-registration period closes.

5.2 Privacy Impact Analysis: Related to Retention

Although there is always a risk of inappropriate access or an intrusion in any system, these risks are lessened in SERA because the system only maintains information until the case is closed or until the end of the registration period.

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.

No. USCIS does not share information from SERA with external agencies or entities. However, USCIS updates CLAIMS 3 with the adjudicative decision from SERA, and USCIS may share CLAIMS 3 information externally. For a full discussion of CLAIMS 3 information-sharing practices, please refer to Section 6.0 of the CLAIMS 3 PIA.[24]

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[24] *See* DHS/USCIS/PIA-016 Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) PIA, *available at* www.dhs.gov/privacy

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

No. USCIS does not share information from SERA with external agencies or entities.

6.3   Does the project place limitations on re-dissemination?

No. There are no limitations on re-dissemination because USCIS does not share information from SERA with external agencies or entities.

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

No. USCIS does not share information from SERA with external agencies or entities.

6.5   Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that data will be shared for purposes other than those stated purpose and use of the original collection.

Mitigation: SERA does not share information with organizations external to DHS. USCIS has formal review and approval process in place for new sharing agreements. Approval officials must review and approve any new sharing initiatives with external agencies, entities, or systems. If USCIS determines there is a need to share SERA information externally, this PIA will be updated and reissued.

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?

An individual may gain access to his or her USCIS records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Due to the temporary nature of information in SERA, USCIS will not be able to provide information from SERA. However, individuals may be able to receive their TPS application information from CLAIMS 3. Any individual seeking access to his or her USCIS record may submit the aforementioned requests to following address:

National Records Center Freedom of Information Act/Privacy Act Program

P. O. Box 648010

Lee's Summit, MO 64064-8010

When seeking records from SERA or any other USCIS system of records, the request must conform to Part 5, Title 6 of the Code of Federal Regulations (CFR). An individual must provide his or her full name, current address, and date and place of birth.

If the request is seeking records pertaining to another living individual, it must include a statement from that individual certifying his/her agreement for access to his/her records.

The request is required to include a notarized signature or to be submitted pursuant to 28 U.S.C. § 1746, which permits statements to be made under penalty of perjury as a substitute for notarization. Without this information, USCIS may not be able to conduct an effective search and the request may be denied due to lack of specificity or lack of compliance with applicable regulations. Although USCIS does not require a specific form, guidance for filing a request for information is available on the DHS website at http://www.dhs.gov/file-privacy-act-request and http://www.dhs.gov/file/foia-overview.

Certain information requested may, however, be exempt from disclosure under the Privacy Act because sometimes files contain law enforcement sensitive information and the release of such information could possibly compromise ongoing criminal investigations. Further information for Privacy Act and FOIA requests for USCIS records can also be found at http://www.uscis.gov.

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

Requests to contest or amend information should be submitted as discussed in Section 7.1. The record must be identified in the same manner as described for making a request for access. The request should state clearly the information that is being contested, the reasons for contesting it, and the proposed amendment to the information. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." If USCIS intends to use information that is not contained in the application or supporting documentation (e.g., criminal history received from law enforcement), it will provide formal notice to the applicant and provide them an opportunity to refute the information prior to rendering a final decision regarding the application.

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

The BIS SORN and A-File SORN provide individuals with notice and guidance regarding the procedures for correcting information. This PIA also provides similar notice. Privacy Act Statements, including notice to correct information, are also contained in immigration forms published by USCIS.

7.4 <u>Privacy Impact Analysis</u>: Related to Redress

There is no risk associated with redress in relation to SERA. USCIS provides TPS applicants with access to his or her records in CLAIMS 3 when requested through a FOIA or Privacy Act request.

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?

SERA has an audit trail capability to monitor user activities and generate alerts for unauthorized access attempts. The general audit log and the security log allows the Global Administrator to select event type, such as access or logon, and the data displayed includes timestamp, name, IP, transaction, and site. The other log is the auto lock log and the display for it shows the employee's name, last login, auto lock date with time, reinstate date with time, username, and site. This auditing is a strong influence for users to use SERA appropriately.

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

USCIS provides annual privacy and security awareness training to all employees and contractors. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, 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 to SERA is limited to authorized USCIS CSC employees and contractors. In compliance with federal law and regulations, users have access to SERA on a need to know basis. This need to know is determined by the individual's current job functions. Users may have read-only access to the information if they have a legitimate need to know as approved by their supervisor and the system owner and have successfully completed all personnel security training requirements. System administrators may have access if they are cleared and have legitimate job functions that would require them to view the information. Developers do not have access to production data except for specially cleared individuals who perform systems data maintenance and reporting tasks. Access privileges are limited by establishing role-based user accounts to minimize access to information that is not needed to perform essential job functions.

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?

SERA does not have any information sharing agreements with organizations within or outside of DHS. Final adjudications are updated in CLAIMS 3. If USCIS determines there is a need to share

SERA information externally, USCIS will engage in an information sharing agreement with the external agency. Furthermore, this PIA will be updated and reissued.

Responsible Officials

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

Approval Signature

Original signed PIA on file with the DHS Privacy Office.

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Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security