



Privacy Impact Assessment  
for the

**U.S. Citizenship and Immigration Services  
Electronic Immigration System  
(ELIS-1)**

Temporary Accounts and Draft Benefit Requests

**DHS/USCIS/PIA-041**

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## Abstract

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. USCIS is transforming its operations by creating a new electronic environment known as the USCIS Electronic Immigration System (USCIS ELIS), which allows individuals requesting a USCIS benefit to register online and submit certain benefit requests through the online system. This system will improve customer service; increase efficiency for processing benefits; better identify potential national security concerns, criminality, and fraud; and create improved access controls and better auditing capabilities. This Privacy Impact Assessment (PIA) is being conducted because USCIS ELIS collects and uses personally identifiable information (PII). This new electronic environment is divided into three distinct processes: 1) Temporary Account and Draft Benefit Requests; 2) Account and Case Management; and 3) Automated Background Functions. This PIA addresses the Temporary Account and Draft Benefit Requests process by describing how Applicants or their Representatives can create a temporary account, draft a benefit request, and submit or abandon that request. USCIS is publishing separate PIAs for the other two USCIS ELIS processes concurrent with this PIA.

## Overview

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. USCIS is transforming its operations by creating a new electronic environment known as the USCIS Electronic Immigration System (USCIS ELIS), which allows individuals requesting a USCIS benefit to register online and submit certain benefit requests. This system will improve customer service; increase efficiency for processing benefits; better identify potential national security concerns, criminality, and fraud; and create improved access controls and better auditing capabilities.

Applicants and petitioners (Applicants); co-applicants, beneficiaries, derivatives, dependents, or other persons on whose behalf a benefit request is made or whose immigration status may be derived because of a relationship to an Applicant (Co-Applicants); and/or their attorneys and representatives recognized by USCIS and/or accredited by the Board of Immigration Appeals (Representatives); may create individualized online accounts. These online accounts help Applicants and their Representatives file for benefits, track the status of open benefit requests, schedule appointments, change their addresses and contact information, and receive notices and notifications regarding their cases. Through USCIS ELIS, individuals may submit evidence electronically. Once an individual provides biographic information in one benefit request, USCIS ELIS uses that information to pre-populate certain fields in future benefit requests. This eases the burden on an individual so he or she does not have to repeatedly type in the same information each time the individual is seeking a benefit from USCIS.



USCIS is publishing three PIAs to cover the following three distinct processes of this new electronic environment and the privacy and security protections incorporated into USCIS ELIS:<sup>1</sup>

- 1. Temporary Accounts and Draft Benefit Requests:** The *DHS/USCIS/PIA-041 Temporary Accounts and Draft Benefit Requests (USCIS ELIS-1) PIA* addresses temporary data provided by Applicants or Representatives. All Applicants first interact with USCIS ELIS by creating a temporary account, setting notification preferences, and drafting their first benefit request. If a first-time Applicant does not begin drafting a benefit request within 30 days of opening a temporary account, USCIS ELIS deletes the temporary account. If he or she does not submit the benefit request within 30 days of starting a draft benefit request, USCIS ELIS deletes the temporary account and all draft benefit request data. If a first-time Applicant submits the benefit request within 30 days, USCIS ELIS changes the status of the account from temporary to permanent, at which point it is processed according to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* detailed below. Applicants with permanent USCIS ELIS accounts or Representatives may also draft benefit requests. USCIS ELIS deletes all draft benefit requests, both first-time and existing Applicants, if they are not submitted within 30 days of initiation.
- 2. Account and Case Management:** The *DHS/USCIS/PIA-042 Account and Case Management (USCIS ELIS-2) PIA* addresses the activities undertaken by USCIS after Applicants or Representatives submit a benefit request. USCIS ELIS uses information provided on initial and subsequent benefit requests and subsequent collections through the Account and Case Management process to create or update USCIS ELIS accounts; collect any missing information; manage workflow; assist USCIS adjudicators as they make a benefit determination; and provide a repository of data to assist with future benefit requests. In addition, USCIS ELIS processes and tracks all actions related to the case, including scheduling appointments and issuing decision notices and/or proofs of benefit.
- 3. Automated Background Functions:** The *DHS/USCIS/PIA-043 Automated Background Functions (USCIS ELIS-3) PIA* addresses the actions USCIS ELIS takes to detect duplicate and related accounts, compare and append information from existing immigration benefit data previously collected by USCIS, and identify potential national security concerns, criminality, and fraud to ensure that serious or complex cases receive additional scrutiny.

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<sup>1</sup> The three PIAs covering USCIS ELIS: DHS/USCIS/PIA-041, DHS/USCIS/PIA-042, and DHS/USCIS/PIA-043, were conducted concurrently and are all available at [http://www.dhs.gov/files/publications/gc\\_1279308495679.shtm](http://www.dhs.gov/files/publications/gc_1279308495679.shtm).



This *Temporary Accounts and Draft Benefit Requests PIA* addresses the temporary account process for first-time Applicants in USCIS ELIS and the draft benefit request process for all Applicants and Representatives. For both temporary and permanent accounts, USCIS ELIS retains information in a draft benefit request until it is submitted or expires. Since USCIS does not have an official need to know the information until it is submitted, USCIS ELIS segregates temporary account and draft benefit request information from permanent information in USCIS ELIS. This segregation of data prevents USCIS personnel (aside from USCIS ELIS System Administrators as part of their system maintenance duties) from viewing this temporary data until the Applicant or Representative submits the benefit request. USCIS will delete the Applicant's temporary account information from USCIS ELIS if the Applicant or Representative does not submit the benefit request within 30 days of initiation of the benefit request. If the Applicant submits the benefit request, USCIS converts the Applicant's temporary account to a permanent account and processes the benefit request information according to the guidelines set forth in the DHS/USCIS/PIA-042 *USCIS ELIS Account and Case Management (ELIS-2) PIA* and DHS/USCIS/PIA-043 *USCIS ELIS Automated Background Functions (ELIS-3) PIA*.<sup>2</sup>

USCIS ELIS allows Applicants who have not previously submitted a benefit request through USCIS ELIS to create an account so they may draft and submit benefits. USCIS does not need to know the account information before the request is submitted because the Applicant has not formally requested anything of USCIS. Further, information at this pre-submittal stage may not be accurate or ready for submission. First-time Applicant accounts are temporary in USCIS ELIS until the Applicant formally submits a benefit request.

For Representatives, USCIS ELIS only creates permanent accounts; it does not create temporary accounts. This allows Representatives to work on several clients' cases at the same time and/or draft benefit requests for multiple clients. USCIS will maintain and use those Representative accounts according to the processes set forth in the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA*.

## **Establishing a Temporary Account**

To create a temporary USCIS ELIS account, an Applicant may visit <https://elis.uscis.dhs.gov> and select the option indicating that he or she is a new user. New users may also navigate to the account creation page through the "Forms" section on [www.uscis.gov](http://www.uscis.gov) for forms that may be processed through USCIS ELIS. After acknowledging a Privacy Act notice, the Applicant is prompted to provide his or her email address on the "Create Account" page. USCIS ELIS checks to ensure there is no existing account associated with the email address, and sends an email with a confirmation link to the email address provided.<sup>3</sup> The link automatically connects to USCIS ELIS and prompts the Applicant to create a password and choose a second form of authentication (e.g., challenge questions, a PIN sent via SMS text

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<sup>2</sup> See *DHS/USCIS/PIA-042 Account and Case Management* and *DHS/USCIS/PIA-043 Automated Background Functions PIAs* at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>3</sup> Applicants must activate their account within five days of receiving the email with the confirmation link. If the Applicant does not complete this account registration process within five days, the temporary account will be deleted and the Applicant must start the process over if he or she wishes to file a benefit request.



message to a mobile phone, or a PIN sent via automated voice call to the home or work phone number provided). This minimal information (email address, password, challenge questions, and optional phone number) is all that is required for an Applicant to establish a temporary account. Following the creation of a temporary account, USCIS ELIS informs the Applicant that the temporary USCIS ELIS account will be deleted after 30 days if he or she does not begin drafting a benefit request within that time period. Once an Applicant with a temporary account begins drafting a benefit request, a new 30-day clock begins before USCIS ELIS deletes the temporary account.

### **Benefit Requests Drafted by the Applicant**

After an Applicant has successfully registered his or her account, he or she may log in to USCIS ELIS and begin drafting a benefit request by selecting a benefit type. To establish the Applicant's notification preferences, USCIS ELIS asks the Applicant how he or she wishes to receive notifications regarding changes to his or her account and/or benefit request (via postal mail, email, and/or SMS text message).

Based on the benefit type selected, USCIS ELIS guides the Applicant through a series of screens that ask for information required to determine benefit eligibility. USCIS ELIS modifies the questions based on the requested benefit and the Applicant's circumstances when asking questions. For instance, if the Applicant indicates that he or she is including family members in the benefit request, USCIS ELIS asks for information about the Applicant's family. If the individual does not indicate that he or she is including a family member in the benefit request, USCIS ELIS does not display the screens asking for family information. If the Applicant has a Preparer assisting the Applicant when the Applicant is completing the benefit request, USCIS ELIS also asks for that Preparer's information. USCIS ELIS does not allow for Preparers to open accounts and edit benefit requests as it does for Applicants and Representatives.

An Applicant may not have all of the required information immediately available when drafting a benefit request, so USCIS ELIS permits the Applicant to save the partially-completed benefit request as a draft for 30 days. This 30-day period begins once the Applicant begins drafting his or her benefit request. If the Applicant or a Representative does not complete and submit the benefit request within 30 days, USCIS deletes the draft request and deletes the Applicant's account if it is temporary (i.e., if the Applicant has not previously submitted a benefit request in USCIS ELIS.)

As the Applicant drafts a benefit request, USCIS ELIS notifies the Applicant if the data entered does not meet the data field format (e.g., letters in a phone number field). Each screen that asks for information has tips with helpful hints and answers to common questions to further assist the Applicant through the draft benefit request. As USCIS ELIS develops, it will notify the Applicant, if it is evident from the information provided, that the Applicant is likely ineligible for the benefit under certain circumstances. For example, if an Applicant begins filling out Form I-821 *Application for Temporary Protected Status*, but claims citizenship of a country that does not have that temporary protected status, USCIS ELIS warns the individual that the country is not among those countries designated for Temporary Protected Status.



During the drafting of a benefit request, Applicants may also upload scanned original documents to satisfy evidentiary requirements associated with the benefit request. Depending on the type of benefit request, USCIS ELIS asks for different types of documents to satisfy different evidentiary requirements, including identity, citizenship, dates and manner of entry into the United States, relationships, financial stability, and other eligibility criteria. USCIS ELIS provides instructions on how to scan these documents and upload them in commonly accepted formats (e.g., .bmp, .gif, .jpg, .pdf, .tif.)

If the Applicant has previously submitted a benefit request through USCIS ELIS, data from the Applicant's account and previous benefit requests pre-populates certain fields on the current draft benefit request so the Applicant does not have to repeat the same information previously provided when submitting his or her new benefit request. The Applicant will also be able to choose if he or she wants to re-use documentary evidence previously scanned into the system for subsequent benefit requests. If the pre-populated information is no longer accurate, the Applicant may change certain information in his or her account. Once submitted, the new information will be used to pre-populate future benefit requests.

After the Applicant has completed the benefit request and uploaded the required evidence, USCIS ELIS displays a PDF of the completed benefit request to allow the Applicant to review his or her responses before submission. If any information is incorrect, the Applicant can go back and make the necessary corrections. If the benefit request is accurate and complete, USCIS ELIS guides the Applicant through the E-signature process, which includes a Privacy Act statement and attestation that the benefit request is complete and the responses are true and accurate. USCIS ELIS also notifies the Applicant that the Internet Protocol (IP) address and browser information of the computer will be collected at the time of submission.

In addition to providing eligibility information, the Applicant or Representative must also pay the fee associated with the benefit request. To collect this fee, USCIS ELIS directs the Applicant to provide payment via an embedded Pay.gov<sup>4</sup> screen after he or she e-signs the benefit request. USCIS ELIS guides the Applicant through the payment process, which accepts credit and debit cards, as well as e-checks. If the Applicant provides invalid credit card, debit card, or e-check information, Pay.gov notifies USCIS ELIS, and USCIS ELIS sends the Applicant (via the pre-selected preferred notification method) a notice that the benefit request has been rejected for lack of payment. For partial or incomplete payments, USCIS ELIS will notify the applicant (or the individual who made the payment on the applicant's behalf) that the benefit request cannot be processed until the proper payment has been submitted. USCIS ELIS will keep the draft benefit request until 30 days from draft initiation, so the Applicant may correct the payment. If Pay.gov indicates the payment information is valid, USCIS ELIS sends a notice to the Applicant that the benefit request has been received for processing. Once the Applicant has provided his or her e-signature and valid payment information, the information in the benefit request is formally

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<sup>4</sup> See U.S. Department of Treasury *Financial Management Services Pay.gov PIA* at [http://www.fms.treas.gov/pia/paygov\\_pia%20.pdf](http://www.fms.treas.gov/pia/paygov_pia%20.pdf) and *Collections Records SORN*, <https://www.federalregister.gov/articles/2003/02/04/03-2521/privacy-act-of-1974-as-amended-system-of-records>.



submitted and used according to the guidelines set forth in the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and *DHS/USCIS/PIA-042 Automated Background Functions (ELIS-3) PIA*. At this point, the temporary account and draft benefit request become permanent in USCIS ELIS and is transitioned to the Account and Case Management system, *is covered by the DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA*.

## **Benefit Requests Drafted by the Representative**

Through USCIS ELIS or the existing paper Form G-28 *Notice of Entry of Appearance As Attorney or Accredited Representative* process, an Applicant may authorize a Representative to act on his or her behalf during the benefit request process. Although the Representative's account is always permanent and thus subject to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA*, he or she may draft a benefit request on behalf of the Applicant; that draft benefit request is subject to this PIA if not submitted after 30 days. This authorization may be terminated by the Applicant at any time.

USCIS ELIS permits a Representative to log into USCIS ELIS and draft benefit requests for his or her clients through the same process as Applicants up to the point of e-signature. When the Form G-28 e-signature functionality becomes available, USCIS ELIS will incorporate the Form G-28 into all benefit requests, so a Representative's account information will automatically pre-populate the Form G-28. After completing the benefit request, the Representative will review the benefit request, acknowledge the Privacy Act statement, and attest to the benefit request's completeness, and that the Applicant's responses are true and accurate. At this point, the benefit request becomes permanent in USCIS ELIS and is transitioned to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA*.

The Form G-28 enhanced e-signature functionality will not be available in the early releases of USCIS ELIS. USCIS has created an interim solution until the functionality becomes available where the Representative prints the benefit request with the included Form G-28 portion for the Applicant's review and physical signature. Once the Applicant has physically signed the printed benefit request, the Representative scans and uploads the signature page as a piece of evidence attached to the electronic benefit request.

As USCIS ELIS develops, a Representative will be able to draft a benefit request and then electronically transfer it to the client's account for the client to review and e-sign. USCIS ELIS will accomplish this by generating a case passcode for the Representative to give to the client. The client will use the case passcode to unlock the draft benefit request and to ensure that the client's Personally Identifiable Information (PII) is not divulged to the wrong person. A draft benefit request that is not submitted within 30 days of initiation will be deleted from the system.

## **Requests Associated with Co-Applicants**

Depending on the benefit request, Applicants may include Co-Applicants on their benefit requests. USCIS ELIS sends a notice to the Applicant informing him or her that USCIS ELIS has created an inferred account for the Co-Applicant and provides the Co-Applicant's USCIS ELIS account number. Pursuant to 8 CFR 103.2(a)(3), Co-Applicants may not access, modify, or



participate in benefit requests submitted by the Applicant. However, Co-Applicants may create their own USCIS ELIS accounts and submit their own benefit requests. If the Co-Applicant later requests a benefit individually, USCIS ELIS will merge the individual and inferred Co-Applicant accounts.

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

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

The primary legal authority supporting the collection of the information by USCIS is the Immigration and Nationality Act (INA) of 1952, Pub. L. No. 82-414, §§ 101, 103, as amended. The Homeland Security Act of 2002, Pub. L. No. 107-296, 116 Stat. 2135 (2002), 6 U.S.C. § 112, and the INA charge the Secretary of Homeland Security with the administration and enforcement of the immigration and naturalization laws. The Secretary of Homeland Security has delegated duties to USCIS pursuant to a DHS Management Directive MD 0150.1. DHS has also promulgated regulations which permit the collection and processing of benefit requests online entitled, “Immigration Benefits Business Transformation, Increment I.” 76 Fed. Reg. 53764 (August 29, 2011); “Immigration Benefits Business Transformation, Increment I; Correction.” 76 Fed. Reg. 73475, (Nov. 29, 2011).

The Government Paperwork Elimination Act (GPEA), Pub. L. No. 105-277, tit. XVII, section 1703, 112 Stat. 2681, 2681-749 (Oct. 21, 1998), 44 U.S.C. § 3504 note, provides that, when possible, federal agencies use electronic forms, electronic filing, and electronic submissions to conduct agency business with the public. GPEA establishes the means for the use of electronic signatures. Executive Order 13571, 75 Fed. Reg. 24339 (Apr. 27, 2011), requires federal agencies to develop plans to streamline delivery of services and improve customer service by exploring lower-cost, self-service options accessed by the Internet or mobile phone and improved processes that deliver services faster and more responsively, reducing the overall need for customer inquiries and complaints.

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

DHS/USCIS issued [DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records](#) (76 FR 70730, November 15, 2011) to cover the collection, maintenance, and use of this information. This system also contains internal DHS user role information covered by [DHS/ALL-004 - General Information Technology Access Account Records System \(GITAARS\)](#) (74 FR 49882, September 29, 2009).



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

Yes. The USCIS ELIS System Security Plan includes the activities associated with the Temporary Account and Draft Benefit Requests process. The Authority to Operate (ATO) was issued on December 6, 2011 and is valid through July 2012, at which time USCIS expects to issue a new 12-month ATO.

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

Yes. NARA approved schedule NI-566-11-002, which permits USCIS to retain an Applicant's temporary account and all draft benefit request information it collects in USCIS ELIS for 30 days after initiation. After 30 days, USCIS ELIS deletes the information. Once an Applicant or his or her Representative formally submits a benefit request, the Applicant's account and benefit request data becomes permanent and retained according to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA*. See Section 5.1, below, for further discussion about the retention of these records.

### **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.**

USCIS has obtained approval from OMB for the data collections required for USCIS ELIS accounts and benefit requests. Please see the Appendix for the list of approved forms and OMB Control numbers.

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

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

An Applicant's temporary USCIS ELIS account registration information includes the following:

- Valid email address;
- Password;
- Challenge questions and answers; and
- Telephone Number (optional).

All benefit requests include the following information about the Applicant or Co-Applicant:

- Alien Registration Number(s);



- Full name and any alias(es) used;
- Physical and mailing address(es);
- Immigration status;
- Date of birth;
- Place of birth (city, state, and country);
- Country of citizenship;
- Gender;
- Contact information (phone number[s], email address);
- Military status;
- Government-issued identification (e.g.; passport, driver's license):
  - Document type,
  - Issuing organization,
  - Document number,
  - Expiration date;
- Benefit requested;
- IP Address;
- Internet browser information;
- USCIS ELIS account number.<sup>5</sup>

The following information may be requested for benefit-specific eligibility:

- U.S. State Department-Issued Personal Identification Number (PID);
- Arrival/Departure Information;
- Immigration history (citizenship/naturalization certificate number, removals, explanations, etc.);
- Family Relationships (e.g., Parent, Spouse, Sibling, Child, Other Dependents, etc., as well as custody, guardianship, and other relationship issues);
- USCIS Receipt/Case Number;
- Personal Background Information (e.g., involvement with national security threats, Communist party, torture, genocide, killing, injuring, polygamy, forced sexual contact, limiting or denying others religious beliefs; service in military or other armed groups; work in penal or detention systems, weapons distribution, combat training);
- Health Information (e.g., vaccinations, referrals, communicable disease, physical or mental disorder, prostitution, drug abuse)
- Education History;
- Work History;
- Financial Information (e.g., income, expenses, scholarships, savings, assets, property, financial support, supporter information, life insurance, debts, encumbrances);

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<sup>5</sup> USCIS provides this information for returning Applicants. The Applicant will provide (or have pre-populated) his or her ELIS account number, once ELIS has assigned one, in the draft benefit request.



- Social Security Number, if applicable;
- Supporting documentation as necessary (e.g., birth certificate, appeals or motions to reopen or reconsider decisions); and
- Criminal Records.

Preparer information includes:

- Name;
- Organization;
- Physical and Mailing Addresses;
- Phone and Fax Numbers;
- Paid/Not Paid; and
- Relationship to Applicant.

Representative information includes:

- Name;
- Law Firm/Recognized Organization;
- Physical and Mailing Addresses;
- Phone and Fax Numbers;
- Email Address;
- Attorney Bar Card Number or Equivalent;
- Bar Membership;
- Accreditation Date;
- Board of Immigration Appeals (BIA) Representative Accreditation Expiration Date; and
- Law Practice Restriction Explanation.

USCIS ELIS stores information provided by Applicants, Representatives, Preparers, and Co-Applicants during the draft benefit request process for the purpose of enabling the Applicant or Representative to reference, change, add, or delete information in preparation for submitting the benefit request(s) to USCIS.

Although USCIS ELIS collects and stores temporary account and draft benefit request information, it is segregated from other data, such as permanent case and account data (covered in the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA.*) This information is not viewable by USCIS (aside from USCIS ELIS System Administrators as part of their system maintenance duties) until the Applicant or Representative formally submits the benefit request, thereby authorizing USCIS to process the information for the benefit sought.

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

USCIS ELIS collects temporary account information directly from the Applicant. USCIS ELIS assists the Applicant by confirming his or her email address and notifying the Applicant



about whether the data elements conform to the data field requirements (e.g., phone number fields do not contain letters, passwords are sufficiently strong).

USCIS ELIS collects draft benefit request information directly from the Applicant or the Representative. USCIS ELIS guides the Applicant or Representative through the process of completing the benefit request and prompts the individual to provide the specific information that is required for the requested benefit. If the benefit request requires supporting documents or other evidence, the Applicant or Representative scans, uploads, and attaches the documents to the benefit request.

After an Applicant has submitted his or her first benefit request, USCIS ELIS pre-populates certain fields in subsequent benefit requests with previously submitted information. This process reduces errors and the burden that may result from an Applicant having to repeatedly type in the same information.

### **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. USCIS ELIS does not collect information from commercial or publicly available data sources during the temporary account or draft benefit request process.

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

USCIS ELIS collects temporary account information directly from the Applicant to ensure accuracy of the data. USCIS ELIS provides a basic assistance function to assist the Applicant or Representative to identify problems with the information provided. For example, if there is an email addresses without an “@” symbol, the individual will receive notice that the email address is not in a proper format.

USCIS ELIS validates the Applicant’s email address to prevent the creation of duplicate accounts. If the email address is already associated with another account, USCIS ELIS asks for the account password. During the creation of a temporary account, USCIS ELIS instructs the Applicant to use an email address that is only accessible by the Applicant. USCIS sends an email confirmation to the email address the Applicant provides to ensure the email address is active and accessible by the Applicant. The Applicant must click on a link provided in the confirmation email to affirm that the email address is correct and active. If the Applicant does not respond to the USCIS email address confirmation email within five days, USCIS deletes the account, and the Applicant must repeat the process for creating an account in USCIS ELIS and filing a benefit request.

USCIS ELIS ensures the accuracy of the information it collects during the drafting of a benefit request by collecting the information directly from the Applicant, the Representative, or the Preparer. Because the information is only in draft form, USCIS employees do not access or verify the accuracy of the data (aside from USCIS ELIS System Administrators as part of their



system maintenance duties). USCIS checks the accuracy of the information once the Applicant or Representative submits the benefit request, at which time it enters the Account and Case Management process.<sup>6</sup>

Although USCIS employees do not check the accuracy of draft benefit request data before it is submitted, USCIS ELIS notifies Applicants and Representatives while they are entering information into certain fields about potential inaccuracies and provides instructions for resolving these potential inaccuracies. The draft benefit request process is designed to perform minimal logical checks on draft data to ensure it is valid, accurate, and complete. These checks include:

- **Edit Checks** – The system performs edit checks on specific data fields to ensure a valid data value is provided (e.g., telephone number consists of digits, not letters.)
- **“Required” Data Field Notations** – The system will denote required data fields with an asterisk (\*). If the Applicant or Representative fail to input data in a required data field, the system displays an error message and will not allow the Applicant or Representative to proceed until the data field is completed.
- **Eligibility Error Messages** – As USCIS ELIS develops, under certain circumstances, the system will warn the Applicant if he or she is ineligible for the requested benefit based on data included in the draft benefit request. For example, if an Applicant begins filling out a Form I-821 Application for Temporary Protected Status, but claims citizenship of a country that is not designated as a country whose nationals are eligible for temporary protected status, USCIS ELIS will warn the individual that the country is not among those listed for Temporary Protected Status. USCIS ELIS will allow the Applicant or Representative to continue the application process and submit the benefit request.
- **Warning Messages** – The system automatically displays a message to the Applicant or Representative when he or she fails to provide information in a “non-required” data field. USCIS ELIS allows the Applicant or Representative to continue the application process and submit the benefit request even if the Applicant or Representative leaves the field blank.

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

**Privacy Risk:** There is a risk that information collected during the temporary USCIS ELIS account creation process may be in excess of defined business needs and use.

**Mitigation:** Minimization of the collected data was a primary concern in establishing the requirements for USCIS ELIS account registration. USCIS considered what an Applicant can do

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<sup>6</sup> See the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and *DHS/USCIS-043 Automated Background Functions (ELIS-3) PIA* for additional information on USCIS’s process for accessing and verifying information.



using USCIS ELIS and the security needs of the system. During this process, USCIS determined that only an email address, password, challenge questions, and an optional phone number were required at this stage. Because an account could be created without a name, an Applicant's name is not collected at this stage. Because the account is not associated with a business need until a benefit request is submitted, USCIS deletes the account after 30 days if the Applicant does not begin drafting a benefit request. This minimizes the privacy risks attached to retaining unnecessary information. If the Applicant begins drafting a benefit request within the initial 30 days, USCIS ELIS retains the temporary account information for 30 days after the Applicant begins the draft.

**Privacy Risk:** There is a risk that data collected during the drafting of a benefit request may exceed what is defined within business needs and use.

**Mitigation:** USCIS developed a detailed process to review what specific information is needed to determine eligibility for a requested benefit. USCIS reviewed all the data elements that are collected on every USCIS benefit request form. This review provided an understanding of common data elements across all form types and allowed for the grouping of information into standard categories for the benefit requests, which include: 1) the Applicant; 2) the benefit being requested; 3) the eligibility for that benefit; 4) the other individuals included in the benefit request; 5) the signatures; and 6) the Preparers and Representatives who assisted with the benefit request process.

USCIS ELIS uses these standard sections for all benefit requests it processes. Sections 1 and 5 are the same for all benefit requests available in USCIS ELIS. Section 2 and Section 3 vary depending on the type of benefit. Section 4 is only completed if multiple derivatives or beneficiaries are included in the benefit request. The completion of Section 6 is only necessary if there is a Representative or Preparer assisting in the benefit request process.

With the sections of the benefit request standardized, USCIS undertook a review of each requested data element. USCIS reviewed the data to ensure that each data element is needed and to increase processing efficiency, provide better customer service, and ensure the benefit is provided only to qualified Applicants and Co-Applicants. Data that did not meet these requirements were eliminated from the benefit request. As an example, Social Security numbers are no longer requested for many benefit types.<sup>7</sup>

USCIS ELIS deletes all draft benefit request information if it is not submitted within 30 days of initiation. This prevents USCIS from processing, handling, or retaining PII regarding an individual that has no benefit request before USCIS.

**Privacy Risk:** There is a risk that incorrect or incomplete information in a draft benefit request may be relied upon by USCIS and affect the decision on an Applicant or Co-Applicant's benefit request.

**Mitigation:** USCIS does not have a need to know the benefit request information until

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<sup>7</sup> See the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and the *Automated Background Functions PIA* for additional information.



an Applicant attests to the accuracy and completeness of the information. USCIS ELIS segregates this draft benefit request data from other data in USCIS ELIS to prevent adjudicators or others from using information that has not been formally submitted by the Applicant. While all data in the system, including temporary account and draft benefit request data, is accessible by USCIS ELIS system administrators, these users may only access the data for system maintenance and stability purposes. System Administrators are not allowed to process or act upon any of the information in the draft benefit request or temporary account. USCIS ELIS logs any access to this data to ensure the integrity of the system.

**Privacy Risk:** There is a risk that information collected from an Applicant about a Co-Applicant may be inaccurate. This risk is compounded by the Co-Applicant's lack of access to information about his or her in USCIS ELIS.

**Mitigation:** Pursuant to 8 C.F.R 103.2(a)(3), Co-Applicants may not access, modify, or participate in benefit requests submitted by the Applicant. However, Co-Applicants may create their own USCIS ELIS accounts and submit their own benefit requests. If the Co-Applicant later requests a benefit as an Applicant, USCIS ELIS merges the individual and Co-Applicant accounts. Co-Applicants would then be able to see data provided on previous benefit requests. Also, USCIS always allows an individual to contest information if it will be the basis for denying a benefit request, including information provided on a previous benefit request by the Primary Applicant.

## Section 3.0 Uses of the Information

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

USCIS ELIS collects and uses temporary USCIS ELIS account information to establish a unique USCIS ELIS account. USCIS uses the email address to verify its validity during the email confirmation process and to detect duplicate USCIS ELIS accounts by sending a confirmation email. The temporary account allows the Applicant to draft and submit benefit requests. USCIS ELIS uses the temporary account contact information to send a warning to the Applicant that the account and draft benefit request are about to expire after 30 days.

If the draft benefit request is not submitted within 30 days of initiation, USCIS ELIS deletes the information. If submitted, information provided in the benefit request becomes permanent and used according to the processes described in *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and *DHS/USCIS/PIA-043 Automated Background Functions (ELIS-3) PIA*.

### 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. During the Temporary Account and Draft Benefit Request process, USCIS ELIS



performs a simple query of USCIS ELIS accounts to ensure no existing USCIS ELIS accounts are associated with an email address before a new account is created.

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

No. There is no intra-departmental sharing of temporary account or draft benefit request data.

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

**Privacy Risk:** There is a risk that information collected by USCIS ELIS may be used for a purpose incompatible with the original purpose of collection.

**Mitigation:** The purpose of the collection of information under the [\*DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records\*](#) is to provide an Applicant with a temporary account so that he or she may submit a benefit request through USCIS ELIS for the first time. All draft benefit request information is collected and used to assist the Applicant or Representative when completing a benefit request.

In addition, the [\*DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records\*](#) only permits the sharing of this information to those parties needed to respond to a system breach and to contractors hired to maintain the system. System administrators have technical access to the draft data, but may only access it for system maintenance purposes. USCIS will keep audit logs to determine who accessed each part of the system and when.

**Privacy Risk:** There is a risk that incomplete draft information collected during the temporary account or draft benefit request process could be used to make an adverse determination about an Applicant or Co-Applicant.

**Mitigation:** USCIS does not need to know the benefit request information until an Applicant attests to the accuracy and completeness of the information and formally applies for a USCIS benefit. USCIS ELIS segregates draft benefit request data from other data in USCIS ELIS to prevent adjudicators or others from using information that has not been formally submitted by the Applicant. While all data in the system, including temporary account and draft benefit request data, is accessible by USCIS ELIS system administrators, these users may only access the data for system maintenance and stability purposes, not to process or act upon any of the information.

**Privacy Risk:** The security of an Applicant's temporary USCIS ELIS account may be breached by a third party.

**Mitigation:** All connections to USCIS ELIS are encrypted. Applicants receive instructions about how to create an account with a strong password, and challenge questions or a second-factor authentication method are used to mitigate the risk of a breach by a third party.



USCIS instructs Applicants and Representatives to secure their account information to ensure confidentiality. USCIS also notifies the Applicant or Representative that divulging confidential information provided to USCIS within the USCIS ELIS account creation or benefit request process to others creates a risk that benefit requests may be altered or that PII may be disclosed, inadvertently or deliberately.

**Privacy Risk:** There is a risk that USCIS personnel who have access to the information contained in USCIS ELIS will use the information in an unauthorized manner.

**Mitigation:** DHS Management Directive System (MD) Number: 11042, “Safeguarding Sensitive But Unclassified (For Official Use Only) Information” (May 11, 2004), provides guidance for the manner in which DHS employees and contractors must handle Sensitive But Unclassified/For Official Use Only Information. Additionally, all DHS employees are required to take annual computer security training, which addresses this issue.

USCIS ELIS also maintains Rules of Behavior which conform to DHS Sensitive Systems Policy Directive 4300A - Rules of Behavior for employees who use DHS systems. Rules of Behavior are part of a comprehensive program to provide complete information security. These guidelines are established to hold users accountable for their actions and responsible for security. OMB Circular A-130 Revised “Management of Federal Information Resource” requires that all major applications and general support systems have Rules of Behavior. USCIS ELIS users are required to read and sign the Rules of Behavior prior to receiving access to the system. A record of those users who have signed the Rules of Behavior is maintained by the Information System Security Officer, and disciplinary action can be taken for violating the Rules of Behavior. These rules cover system access, passwords and other access control measures, data protection, use of government office equipment, software, internet and e-mail use, incident reporting, and accountability. Users acknowledge, by signing and dating the DHS Rules of Behavior, that violating the system rules of behavior will involve potential disciplinary actions. Any person who fails to comply with the rules of behavior is subject to penalties and sanctions, including: verbal or written warning; removal of system access for a specific period of time; reassignment to other duties; criminal or civil prosecution; or termination, depending on the severity of the violation.

## 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 ELIS provides Applicants and Representatives notice throughout the account creation and benefit request process. Prior to the submission of any information to USCIS ELIS, individuals are presented with a Privacy Act Statement, as required by Section (e)(3) of the Privacy Act. The Privacy Act Statement notifies the individual about the authority to collect the information requested, purposes, routine uses, and consequences of providing or declining to



provide the information to USCIS. Individuals are also provided general notice through the publication of this PIA and information provided on [www.uscis.gov](http://www.uscis.gov). Further, DHS/USCIS issued a SORN, [\*DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records\*](#) (76 FR 70730, November 15, 2011) to cover the collection, maintenance, and use of this information.

In addition, USCIS engages in public outreach efforts to educate potential users about USCIS ELIS. This effort includes demonstrations of the system and opportunities for the public to provide feedback about the system.

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

Providing information to USCIS is a voluntary act on the part of the Applicant seeking a benefit through USCIS ELIS. Applicants are informed at the point of data collection that it is within their legal rights to decline to provide the requested information. However, failure to provide the requested information may result in the inability to create a temporary USCIS ELIS account or to electronically draft and submit a benefit request. Declining to provide all of the required information on a benefit request or to provide payment may result in USCIS declining to accept the benefit request. If the Applicant or Representative does not submit the benefit request, USCIS deletes it after 30 days and does not grant a benefit.

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

**Privacy Risk:** There is a risk that the Applicant may not be fully aware of how his or her information will be used by USCIS.

**Mitigation:** Applicants are given notice through the publication [\*DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records\*](#) in the Federal Register and this PIA. Applicants are also given notice in the form of a Privacy Act Statement that the information they provide is being collected to establish a unique account, which entails checking for existing accounts associated with the provided email address.

Through statements in the SORN, this PIA, and the USCIS ELIS website, Applicants are given notice that USCIS does not view their draft benefit request data or consider their eligibility for the benefit they seek until they formally submit the benefit request. Applicants are also given notice in the form of a Privacy Act Statement that the information they provide is being collected to determine whether they are eligible for the requested benefit(s).

**Privacy Risk:** There is a risk that Co-Applicants may not be aware that an Applicant has provided their information to USCIS.

**Mitigation:** Pursuant to 8 C.F.R. 103.2(a)(3), Co-Applicants may not access, modify, or participate in benefit requests submitted by the Applicant. USCIS relies on an Applicant who lists a Co-Applicant on his or her benefit request to act with the consent of the Co-Applicant. For



example, a Co-Applicant is usually the Applicant's spouse or child.

## **Section 5.0 Data Retention by the project**

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

If a first-time Applicant does not begin drafting a benefit request within 30 days of creating the temporary account, USCIS ELIS deletes the temporary account. If a first-time Applicant begins drafting a benefit request within 30 days of creating the temporary account, he or she has 30 days to submit the benefit request. This allows the Applicant to start, stop, and edit the draft benefit request while gathering the information necessary to submit a completed benefit request. If he or she does not submit the benefit request within 30 days of starting a draft benefit request, USCIS ELIS deletes the temporary account and all draft benefit request data.

If an Applicant or Representative formally submits a benefit request within the 30-day window, USCIS converts the temporary account to a permanent USCIS ELIS account and retains the account and benefit request information according to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and *DHS/USCIS/PIA-043 Automated Background Functions (ELIS-3) PIA*.

### **5.2 Privacy Impact Analysis: Related to Retention.**

**Privacy Risk:** There is a risk that information will be retained longer than necessary.

**Mitigation:** In order to reduce the risk of mishandling temporary USCIS ELIS account or draft benefit request data, the retention period is 30 days after initiation.

**Privacy Risk:** There is a risk that after an Applicant or Representative changes information on a draft benefit request, the original data will be kept by USCIS.

**Mitigation:** USCIS only stores the last version of a draft benefit request.

**Privacy Risk:** There is a risk that USCIS could retain draft benefit request information on tape backups after the application has been formally submitted or deleted.

**Mitigation:** USCIS does not retain temporary account or draft benefit request data on backup tapes in the traditional sense. A real-time copy of this data is kept at a backup facility for disaster recovery purposes, but it is deleted at the same time as the original data. Thus, when a temporary USCIS ELIS account and draft benefit request are abandoned for 30 days, USCIS deletes the data from both USCIS ELIS and the backup facility.



## Section 6.0 Information Sharing

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

No. USCIS does not share temporary account and draft benefit request information outside of DHS.

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

As noted in the [DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records](#), USCIS does not share temporary USCIS ELIS account or draft benefit request information externally.

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

Yes. USCIS ELIS does not share temporary account or draft benefit request information outside DHS.

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

USCIS ELIS does not disseminate temporary account and draft benefit request information. Once the Applicant or Representative submits the benefit request, USCIS ELIS uses, maintains, and shares the information according to the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* and *DHS/USCIS/PIA-043 Automated Background Functions (ELIS-3) PIA*, which describes the procedures for records of disclosures.

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

**Privacy Risk:** There is a risk of potentially inappropriate or unauthorized sharing or use of this information.

**Mitigation:** USCIS has minimized this risk by prohibiting the sharing of any information outside of USCIS during the creation of a temporary USCIS ELIS account or during the drafting of a benefit request. After an Applicant has successfully created a temporary USCIS ELIS account and has begun drafting a benefit request, the risk of unauthorized information sharing is mitigated by strict adherence to the [DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records](#) (76 FR 70730, November 15, 2011). The SORN does not provide for any approved Routine Use (aside from investigating system breaches or authorizing contractors to perform system maintenance) until the Applicant or Representative formally submits the benefit request, authorizing USCIS to use that information.



## Section 7.0 Redress

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

The nature of the temporary USCIS ELIS account prevents an Applicant from editing his or her email address until he or she submits the first benefit request. All other information may be edited for 30 days before it is deleted. Once the Applicant has submitted his or her first benefit request, the account is made permanent and the Applicant may edit the email address associated with their USCIS ELIS account. If a Representative has drafted the benefit request, the Applicant must review and sign the benefit request, either physically or electronically, before it may be submitted. If the Applicant identifies errors, he or she may decline to sign the draft benefit request, and the Representative may make the appropriate corrections.

Pursuant to 8 CFR 103.2(a)(3), Co-Applicants may not access, modify, or participate in benefit requests submitted by the Applicant. However, Co-Applicants may create their own USCIS ELIS accounts and submit their own benefit requests. If the Co-Applicant later requests a benefit as an Applicant, USCIS ELIS merges the individual's Applicant and Co-Applicant accounts. See the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* for more information.

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

As described above in Section 7.1, Applicants and Representatives may log in to USCIS ELIS over a period of 30 days to view and edit draft benefit requests so that they may ensure the information is accurate and complete. Once the benefit request has been submitted, it cannot be modified through the Temporary Account and Draft Benefit Request process. Modification of submitted information may only be done through the Account and Case Management process, which begins after the Applicant or Representative has formally submitted a benefit request. See the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* for a detailed explanation.

Because of the temporary nature of the temporary accounts and un-submitted draft benefit requests, individuals cannot access these records under the Freedom of Information Act (FOIA). However, if the benefit request is formally submitted, individuals may access their own information by logging in to USCIS ELIS or submitting a request in writing to:

National Records Center  
FOIA/PA Office  
P.O. Box 648010  
Lee's Summit, MO 64064-8010

If an individual believes more than one component of DHS maintains Privacy Act records concerning him or her, the individual may submit the request the component's FOIA



Officer, whose contact information can be found at: [http://www.dhs.gov/xfoia/editorial\\_0579.shtm](http://www.dhs.gov/xfoia/editorial_0579.shtm) under “contacts,” or to the Chief Privacy Officer, Department of Homeland Security, 245 Murray Drive, SW., Building 410, STOP-0550, Washington, DC 20528.

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

After successfully creating a temporary USCIS ELIS account, the USCIS ELIS displays a notice to the Applicant reminding him or her to ensure the accuracy of all information prior to submission.

When an Applicant or Representative logs in to USCIS ELIS, draft benefit requests are immediately presented. If a benefit request is approaching the 30-day deadline, a notification is sent to the Applicant or Representative as a reminder. Once the benefit request has been submitted, the processes described in the *DHS/USCIS/PIA-042 Account and Case Management (ELIS-2) PIA* are used to notify the Applicant or Representative. Otherwise, the Applicant or Representative is notified through the instructions, tips, and help provided in USCIS ELIS, the publication of the [DHS/USCIS-014 – Electronic Immigration System-1 Temporary Accounts and Draft Benefit Requests System of Records](#), and this PIA.

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

**Privacy Risk:** There is a risk that inaccurate or erroneous information will be entered by an Applicant during the creation of a temporary USCIS ELIS account or during the drafting of a benefit request.

**Mitigation:** USCIS ELIS confirms that the email address provided by the Applicant is not associated with an existing account, is a valid email address, and is accessible by the Applicant. Using the email address, password, and second factor authentication process, an Applicant may make corrections and/or deletions to any inaccurate or erroneous information during the 30 day window after initiation of a benefit request. Prior to submission of a benefit request, an Applicant and/or Representative must view a snapshot of the provided information, verify its accuracy, and correct any errors before signing and submitting the benefit request.

**Privacy Risk:** An Applicant or Representative may mistakenly believe that he or she has completed drafting a benefit request but has failed to formally submit it. In this situation, the Applicant’s redress rights may be limited.

**Mitigation:** USCIS ELIS warns Applicants and Representatives before they draft a benefit request that his or her benefit request will not be considered until the Applicant or Representative receives a USCIS ELIS confirmation receipt number. Applicants and Representatives can check the status of their benefit requests within USCIS ELIS and will receive confirmation of their submission through their preferred notification procedure (mail, email, or SMS text message).



**Privacy Risk:** Co-Applicants do not have any redress rights.

**Mitigation:** Pursuant to 8 CFR 103.2(a)(3), Co-Applicants may not access, modify, or participate in benefit requests submitted by the Applicant. However, if a Co-Applicant is about to be denied a benefit, USCIS allows the Co-Applicant to contest the basis for the denial. Also, Co-Applicants may create their own USCIS ELIS accounts and submit their own benefit requests. If the Co-Applicant later requests a benefit as an Applicant, USCIS ELIS merges the individual's Applicant and Co-Applicant accounts, and provides the individual access to the data provided about them as a Co-Applicant.

## **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 has built in technical safeguards that segregate draft application data from other data in USCIS ELIS. These safeguards ensure that the data is only viewable and accessible to the Applicant or Representative while in a draft stage. Limiting the retention of the data to 30 days reduces the likelihood that USCIS and third parties will be able to access or abuse this data.

In accordance with National Institute of Standards and Technology (NIST) controls and OMB requirements, USCIS staff and/or administrators of the USCIS ELIS conduct a self-assessment of privacy policies and security controls, at least annually, to determine the extent to which policies and controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting the privacy and security requirements for the operating environment.

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

All internal USCIS ELIS users, whether federal employees or contractors, complete annual privacy training to ensure they properly handle PII. DHS personnel, contractors, and vendors with significant security responsibilities (e.g., Information System Security Officers and system administrators) receive initial specialized training, and annual refresher training thereafter, specific to their security and privacy responsibilities. Additionally, USCIS provides privacy training specific to USCIS ELIS, as necessary. Staff who maintain USCIS ELIS also train personnel in their incident response roles and responsibilities with respect to the USCIS solution, as well as provide refresher training on an annual basis.

USCIS maintains training records, including name and position, type of training received, and costs of training. USCIS requires IT security and privacy awareness training before authorizing IT accounts.



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

As USCIS ELIS develops, employees will have access to different views and content based on their roles and access privileges. All USCIS ELIS employees will have their access recorded along with their activities in USCIS ELIS. Once within USCIS ELIS, an employee's access will be restricted based on their role and profile. Each user's view will be limited to the data required to perform their job function (e.g., adjudicator, supervisor, or performance analyst). Only System Administrators have the capability to access draft benefit request data, as required to ensure the stability and maintenance of the 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 does not share temporary USCIS ELIS account and draft benefit request information. However, once an application has been formally submitted, USCIS ELIS shares benefit request information according to the Routine Uses of the applicable SORNs and the Privacy Act of 1974. The USCIS Office of Transformation Coordination - Program Management Office, USCIS Office of Information Technology, USCIS Privacy Office and USCIS Office of Chief Counsel will review all MOUs prior to approval of sharing USCIS ELIS information.

New uses of information and/or new access requests for the system by organizations within DHS and outside agencies will be evaluated through the USCIS change control process, including assessments of impact, and will be approved by the proper Program Authorities of this process (e.g., USCIS Office of Transformation Coordination's Change Control Board, USCIS Privacy Office, USCIS Office of Information Technology, and DHS offices where applicable).

## **Responsible Officials**

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

## **Approval Signature**

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

Mary Ellen Callahan  
Chief Privacy Officer  
Department of Homeland Security