



Privacy Impact Assessment
for the

National Customer Service Center

DHS/USCIS/PIA-054

July 14, 2014

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) operates the National Customer Service Center (NCSC) to provide nationwide telephonic assistance to customers calling with immigration service and benefit inquiries. The NCSC uses a wide variety of systems, applications, and tools as part of its call center infrastructure to ensure calls are queued and processed as quickly as possible. This Privacy Impact Assessment (PIA) discusses the USCIS systems used to operate NCSC and evaluates the privacy risks and mitigations associated with the collection, use, and maintenance of personally identifiable information (PII).

Overview

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States. Part of USCIS's mission is to provide effective customer-oriented immigration benefit and information services. USCIS developed the National Customer Service Center (NCSC) to streamline the processing of customer inquiries in order to improve the customer's overall experience. Customer includes an applicant, petitioner, employer, attorney, Community Based Organization, or any individual calling into NCSC for immigration related information. The USCIS Customer Service and Public Engagement Directorate (CSPE) operates the NCSC. CSPE's mission is to provide clear, accurate, and timely responses to customer concerns and questions and engage the public through transparent dialogue that promotes participation and feedback. The NCSC is a call center that receives calls from customers seeking telephonic assistance. The NCSC serves as the primary method for customers to telephonically request assistance with applications and petitions, regulatory information, and up-to-date status information on benefit applications and petitions.

The NCSC has a multi-tier customer support system that offers recorded and live assistance options. These tiers include the Interactive Voice Response system (IVR), Tier 1 Customer Service Representatives (CSR), and Tier 2 Immigration Service Officers (ISO). USCIS uses a wide variety of systems, applications, and tools to support workflow, data capture, telecommunication functionality, and reporting. The purpose of this PIA is to examine the personally identifiable information (PII) the NCSC and its associated systems collect, use, and maintain. This PIA also discusses the USCIS systems used to operate NCSC and evaluates the privacy risks and mitigation strategies built into the respective systems.

Interactive Voice Response

Incoming calls are immediately directed to an IVR system, an automated telephone information system that delivers pre-recorded voice messages to the caller. The purpose of IVR



is to streamline access to general immigration information, case status, and customer service representatives. Prior to the collection of any information from the caller, the IVR system provides a recorded Privacy Act Statement that advises the caller that information provided will be used by NCSC to respond to inquiries or requests for information. USCIS also informs callers that USCIS records telephone calls for quality assurance purposes and USCIS collects and uses telephone numbers to contact the caller about his or her customer service experience. The NCSC collects and maintains the telephone number of all incoming calls using an automatic identification number application.¹

The IVR, which is available in English and Spanish, presents callers with a list of self-service options. A caller navigates through the system menus by using his or her telephone keypad or voice commands to retrieve general information without live-assistance from a USCIS representative. The IVR system also handles application status or other case-specific questions. The IVR allows a customer to telephonically check on the status of his or her pending immigration benefit application or petition through the Customer Relationship Interface System (CRIS) Case Status Service Online (CSSO) by entering his or her receipt number, a unique confirmation number that USCIS provides the customer upon receipt of an application or petition for immigration benefits.² After the customer enters his or her receipt number, a recording provides the caller with a current status of the case.

A caller seeking live assistance may have his or her call transferred to a live representative. Through this function, the IVR system either routes calls and information selected by the caller within the IVR directly to a Tier 1 CSR for basic, informational questions or a Tier 2 ISO for questions on filed or pending cases. Both Tier 1 and 2 representatives may create service requests, which are routed to service centers and local field offices on matters such as expedited requests, change of address, appointment rescheduling, case processing delays that exceed the posted times, and other matters that may be unique to a specific case.

Tier 1 - Customer Service Representatives:

A Tier 1 CSR is the first person a customer reaches to assist with general immigration issues and questions. Tier 1 is staffed by contractors. CSRs relay basic immigration information to customers through scripts and may assist callers with immigration services, immigration information on benefits and processes, pending case information, and information on special programs and other resources. Tier 1 CSRs use the CRIS Customer Service Gateway, an

¹ Automatic number identification is a feature of a telecommunications network for automatically determining the origination telephone number on toll calls for billing purposes.

² CSSO provides status updates on pending immigration benefits applications and petitions to USCIS customers and their representatives. Individual customers, their representatives, Tier 1 CSRs, and Tier 2 ISOs can access CSSO via the Internet and enter a receipt number. After the user submits the receipt number, CSSO displays the current status of the case. See DHS/USCIS/PIA-019(b) - CRIS Update for more information on CSSO, available at www.dhs.gov/privacy.



application that displays the appropriate scripts for answering customers' questions.³ These scripts are tailored for Tier 1 CSRs to explain laws, regulations, and USCIS forms information in response to customer questions.

In the course of assisting the caller, the CSR may ask the customer to provide his or her Alien Number (A-Number) or receipt number and enters this information into Customer Relationship Management (CRM)⁴ system. CSRs use this information facilitate transactions that include submitting a service request via Service Request Management Tool (SRMT),⁵ transferring information to facilitate escalating a call to Tier 2, or checking a case status via CRIS CSSO. Receipt number and A-Number is not required for general inquiries. The CSR may also electronically forward the caller's information to Tier 2 in the event the call requires escalation. Information entered into the CRM system is deleted when the cache memory is cleared and the CRM application is shut down at the end of each day.

The call is terminated if the customer's questions are sufficiently answered at Tier 1. However, inquiries that cannot be answered by a Tier 1 CSR are transferred to a Tier 2 ISO. The Tier 1 CSR collects and manually enters the following information in the CRM, if applicable to the call: form type, receipt number or A-Number, reason for transfer, caller type, telephone number, selections made by the customer within the IVR, and indication of service request creation. The call along with this information is placed in queue for further assistance by Tier 2 ISOs. The information is sent in an email packet to Tier 2 through CRM.

Virtual Queue

NCSC uses an automatic call distributor to route calls from Tier 1 to Tier 2. If a customer chooses to have his or her call transferred to Tier 2, the call distributor places the caller into a queue for the next available representative. The calls are placed in a virtual queue with recorded announcements and wait times. If the estimated wait time exceeds the threshold determined by NCSC management, the call distributor offers the caller the option of receiving an automatic callback from the NCSC callback service. This feature provides the customer with the option of remaining in the queue and receiving a callback from USCIS when an ISO becomes available. The customer may hang up and the callback application calls when he or she reaches the front of the line. The system calls the customer back at the number he or she either entered into the system or the number from which the customer called. This option reduces abandoned calls and alleviates the burden on the customer to wait for a representative to become available. If the customer elects not to use this option, the call remains in queue for the next available ISO.

³ See DHS/USCIS/PIA-019 - CRIS, available at www.dhs.gov/privacy.

⁴ CRM provides a unified interface for Tier 1 hosted applications, which include the CRIS, Customer Service Gateway, Case Status, Processing Times, and transferring escalations to NCSC Tier 2.

⁵ See DHS/USCIS/PIA-019 - CRIS, available at www.dhs.gov/privacy.



Tier 2 – Immigration Service Officers

USCIS Tier 2 Contact Centers include the Eastern Telephone Center, the Western Telephone Center, and the Customer Contact Center. The Eastern and Western Telephone Centers receive inbound calls from IVR or Tier 1 and provide live telephonic assistance. The Customer Contact Center receives electronic inquiries from USCIS Electronic Immigration System (USCIS ELIS) customers and responds to the customer via telephone or email.⁶

The Tier 2 Contact Centers are staffed with trained, certified, and experienced USCIS ISOs who provide clarification on benefits and services that are often complex or require the use of a variety of resource materials to resolve customer issues. The primary mission of Tier 2 is to address caller questions specific to his or her situation. Tier 2 ISOs answer calls from a customer when his or her particular case-specific questions are more complex than general inquiries.

USCIS enters all information in support of Tier 2 into the CSR for processing. Tier 2 ISOs either receive information from IVR or Tier 1 CSR personnel, or a completed web form. For incoming calls, USCIS links the information entered by the CSR into the CRM with the customer's phone call. When the ISO answers the customer's call, the ISO's computer screen automatically populates with the information the CSR entered into CRM. For web forms, ISOs update CSR to process USCIS ELIS-related inquiries. However, if the caller is transferred from IVR to Tier 2, the ISO will collect customer information and enter it into CRM.

The ISO uses the caller's information and inserts portions of the data into the following USCIS and ICE case management systems to query and gather the information needed to assist the customer:

USCIS Systems

- Person Centric Query System (PCQS)⁷
- Computer Linked Application Information Management System (CLAIMS) 3⁸
- CLAIMS 4⁹
- National File Tracking System (NFTS)¹⁰
- Scheduling and Notification of Applicants for Processing (SNAP)¹¹

⁶ See DHS/USCIS/PIA-041 - ELIS-1 Temporary Accounts and Draft Benefit Requests; DHS/USCIS/PIA-042 - ELIS-2 Account and Case Management; DHS/USCIS/PIA-043 - ELIS-3 Automated Background Functions, available at www.dhs.gov/privacy. USCIS ELIS customers may complete the USCIS ELIS Contact Us web form, available at <https://egov.uscis.gov/cris/contactus>.

⁷ See DHS/USCIS/PIA-010 - Person Centric Query Service (PCQS), available at www.dhs.gov/privacy.

⁸ See DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3), available at www.dhs.gov/privacy.

⁹ See DHS/USCIS/PIA-015(b) - Computer Linked Application Information Management System (CLAIMS 4) Update, available at www.dhs.gov/privacy.

¹⁰ See DHS/USCIS/PIA-032 - National File Tracking System (NFTS), available at www.dhs.gov/privacy.



- Marriage Fraud Amendment System (MFAS)¹²
- Travel Document Processing System (TDPS)¹³
- Correspondence Handling On-line (ECHO)¹⁴
- Central Index System (CIS)¹⁵
- Refugees, Asylum, and Parole System (RAPS)¹⁶
- USCIS ELIS¹⁷

ICE System

- Student And Exchange Visitor Information System (SEVIS)¹⁸

Tier 2 ISOs use these systems to gain access to application information and case history needed to assist the caller. The ISO also uses the customer's information, authenticates, and verifies the identity of the caller according to Standard Operating Procedures (SOP). These procedures include asking questions of the caller that would only be known to him or her, such as his or her parent's country of origin, his or her birthdate, or other personal information.

At the conclusion of each business day, all of the information entered into CRM is deleted when the cache memory is cleared.

Customer Satisfaction Survey

The NCSC also conducts Customer Satisfaction Surveys to help determine the level of customer satisfaction by having the customer rate the services received in the three levels of service offered by the NCSC (i.e., the IVR, Tier 1, and Tier 2). USCIS employs the services of a third-party contractor to conduct the survey. USCIS provides the contractor with a random list of telephone numbers that have called the NCSC toll-free number. The contractor calls the telephone number to conduct a brief, anonymous customer satisfaction survey relating to the service the IVR, Tier 1, or Tier 2 provided. Before conducting the survey, the contractor advises the individual that participation is voluntary, PII will not be

¹¹ See DHS/USCIS/PIA-020 - Scheduling and Notification of Applicants for Processing (SNAP), available at www.dhs.gov/privacy.

¹² See DHS/USCIS-007 - Benefits Information System, 73 FR 56596 (September 29, 2008).

¹³ See DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3), available at www.dhs.gov/privacy.

¹⁴ See DHS/USCIS/PIA-023 - Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

¹⁵ See DHS/USCIS/PIA-009 - Central Index System (CIS), available at www.dhs.gov/privacy.

¹⁶ See DHS/USCIS/PIA-027(b) - Refugees, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS) Update, available at www.dhs.gov/privacy.

¹⁷ See DHS/USCIS/PIA-042 - ELIS-2 Account and Case Management, available at www.dhs.gov/privacy.

¹⁸ See DHS/ICE/PIA-001 - Student and Exchange Visitor Information System (SEVIS), available at www.dhs.gov/privacy.



collected as part of the survey, and the results of these surveys are tabulated in order to provide USCIS management with a broad picture of customer satisfaction levels regarding IVR, Tier 1, and Tier 2 services.

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 Immigration and Nationality Act (INA) sections 101, 103, 221, and 245 authorize the collection of this information.¹⁹

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

The PII collected, used, and maintained by the systems associated with the NCSC is covered by the following SORNs:

- DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records;²⁰
- DHS/USCIS-007 - Benefits Information System (BIS);²¹
- DHS/USCIS-010 - Asylum Information and Pre-Screening;²² and
- DHS/USCIS-015 - Electronic Immigration System-2 Account and Case Management.²³

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

The CSPE Tier 2 CRM application has undergone the complete Security Accreditation Process, and was issued an Authority to Operate on June 7, 2013. The authority to operate is valid through June 7, 2016. The Customer Service Public Engagement Computer Sciences Corporation Tier 1 (CSPE CSC Tier 1) was issued an authority to operate on February 27, 2014, and is valid through February 27, 2017. Customer Service Public Engagement Hewlett Packard Tier 1 (CSPE HP Tier 1) is undergoing the Security Accreditation Process and is expected to be awarded an authority to operate by November 2014.

¹⁹ See 8 U.S.C. §§ 1101, 1103, 1201, and 1255.

²⁰ DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (November 21, 2013).

²¹ DHS/USCIS-007 - Benefits Information System, 73 FR 56596 (September 29, 2008).

²² DHS/USCIS-010 - Asylum Information and Pre-Screening, 75 FR 409 (January 5, 2010).

²³ DHS/USCIS-015 - Electronic Immigration System-2 Account and Case Management System of Records, 78 FR 20673 (April 5, 2013).



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

No. USCIS is negotiating a retention schedule with NARA for NCSC and is subject to final approval.

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 Telephone Survey is subject to PRA requirements. OMB approved the collection of customer satisfaction data from the telephone survey under OMB Control Number 1615-0121.

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.

During the course of the call, NCSC personnel may request information from the individual to further assist with case-related questions and issues, including authentication. The specific data elements collected are dependent on the nature of the call. Information collected may include: name, receipt number, A-Number, date of birth, country of birth, country of citizenship, address, telephone number, email address, and a description of the issue. In addition, all inbound calls to NCSC are recorded for quality monitoring and customer satisfaction assurance purposes. The recorded content may contain PII (based upon the nature of the conversation).

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

NCSC collects most of the information directly from the individual or his or her representative who is calling about case-related questions. If the issue is case-specific, USCIS authenticates the caller's identity through a series of questions prior to the disclosure of information. The NCSC Tier 2 ISO searches USCIS and ICE systems, such as CLAIMS 3, CLAIMS 4, USCIS ELIS, RAPS, CIS, and SEVIS, to retrieve case information and verify the caller's identity according to the call center's SOP.²⁴ These procedures include, asking questions about the caller's date of birth, country of birth, and address. In addition, all inbound calls to NCSC are recorded for quality monitoring and customer satisfaction assurance. The recorded

²⁴ USCIS uses different case management systems to adjudicated benefit requests. The case management system used to authenticate the caller's identity depends on the benefit requested by the caller.



content may contain PII (based upon the nature of the conversation). The recordings are stored and available for 90 days for management personnel to review for quality assurance.

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.

NCSC ensures information accuracy by collecting information directly from the individual or his or her representative. NCSC Tier 2 representatives may use either the receipt number or A-Number provided by the individual to retrieve the individual's account in a USCIS case management system. If the information provided does not match an A-Number or receipt number, the case management system returns an error stating that the receipt number or A-Number does not exist. If the system finds a match, the NCSC representative asks a series of questions to validate the caller's identity according to the call center's SOP to assist with the inquiry and prevent the unauthorized disclosure of information. These procedures include asking questions that are only known to the individual or his or her representative, such as country of origin, birth date, or other personal information. If the individual identifies incorrect information that is stored in a USCIS case management system resulting in a typographical error, then the ISO creates a typographical error service request in SRMT.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USCIS will collect more information than is necessary.

Mitigation: USCIS mitigates this risk through clear SOPs that specify what information the CSR or ISO may ask the caller to provide. Since NCSC involves a live conversation, USCIS cannot prevent the caller from providing more than the minimum information required to answer the caller's question. However, USCIS only retains the call recordings for 90 days for quality assurance purposes.

Privacy Risk: There is a risk that USCIS will maintain inaccurate data.

Mitigation: USCIS also mitigates this risk by limiting the amount of time USCIS retains the information. USCIS only uses the information collected to assist with a caller's inquiry, return a customer's call through the callback application, conduct a customer satisfaction survey, and keep an accurate record of calls. USCIS deletes CRM data each day and phone recordings 90 days from the date of the call.



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.

NCSC collects and uses information pertaining to the individual, including names, addresses, and personal feedback, for any of the following purposes:

- Assist callers with obtaining documents, regulatory information, up-to-date status information on immigration-related benefits and applications, and other information;
- Evaluate callers' experiences and modify different aspects about NCSC to improve customer satisfaction and call center services, and better train employees;
- Return calls to provide the customer with assistance; and
- Keep an accurate record of calls.

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

No.

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

No.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk of unauthorized access and dissemination of information.

Mitigation: USCIS mitigates this risk by implementing role-based access controls. The NCSC operates on a two-tier model. USCIS contract personnel serves as the first level of customer service support for the NCSC. Tier 1 CSRs use Frequently Asked Questions, scripts, and operational guidelines developed by USCIS to assist customers. Tier 1 CRS may collect limited PII to obtain case status information via CSSO or create a service request via SRMT. Beyond these systems, the Tier 1 CSRs do not have access to USCIS systems. If questions go beyond the scripted responses, Tier 1 CSRs may transfer calls to Tier 2. Tier 2 has USCIS ISOs who can provide case-specific information and detailed answers.

Tier 2 ISOs are USCIS adjudicators that have access to all USCIS major applications. ISOs receive specific training and instruction relating to the proper use and dissemination of PII. If an inquiry is case-specific, the SOPs require the ISO to authenticate and verify the caller's



identity prior to disclosing personal information. This information collection, use, and dissemination is consistent with the USCIS goal of providing efficient service to the public.

Privacy Risk: There is a risk that negative feedback from customer satisfaction assessments could be linked to an individual and adversely impact the individual's benefit request.

Mitigation: USCIS mitigates this risk by keeping the survey anonymous and unlinked to a particular customer's records. Before conducting the survey, the contractor notifies the customer that the telephone survey is not mandatory and is conducted anonymously. The contractor also explains that the purpose of the survey is to improve customer satisfaction, provides instructions on how to complete the survey, and describes how to opt-out of future calls. The customer satisfaction survey collects information pertaining to customer experiences and asks the customer to describe how he or she felt about the NCSC services. USCIS does not collect PII from the individual during the customer satisfaction survey and does not link the responses back to the customer's records.

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.

USCIS provides a recorded Privacy Act Statement prior to the collection of any information 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 for collecting it, routine uses, and consequences of providing or declining to provide the information to USCIS. Additionally, the individual is also provided notice that phone calls may be recorded for quality assurance and telephone numbers may be used to contact the customer about the customer service experience. Individuals are also provided general notice through the publication of this PIA and BIS SORN.²⁵

If USCIS randomly selects the customer for a customer survey, the contractor advises the individual that participation is voluntary before beginning the survey. Prior to conducting the telephone survey, the contractor verbally notifies the customer of the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt-out of future requests.

²⁵ DHS/USCIS-007 - Benefits Information System, 73 FR 56596 (September 29, 2008).



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

Use of NCSC services is voluntary. Before collecting information from the caller, USCIS provides the caller with a recorded Privacy Act Statement that notifies the caller that providing the requested information to USCIS is voluntary. The caller may decline to provide information by hanging up the phone or refusing to provide the CSR or ISO with the requested information. If a customer later receives a call to complete a survey, the contractor notifies the customer that participation is voluntary and provides the customer with instructions on how to opt-out of future surveys.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware of the collection and use of their PII.

Mitigation: NCSC provides notice to individuals and their representatives seeking telephonic assistance. Prior to the collection of information, USCIS informs the customer through a recorded Privacy Act Statement that USCIS uses the collected information to respond to inquiries or requests for information. USCIS informs the customer that USCIS records telephone calls for quality assurance purposes, and telephone numbers are automatically collected and used to contact the customer about his or her experience with NCSC. The caller may decline to provide information by hanging up the phone or refusing to provide the CSR or ISO with the requested information; however, that may prevent the customer from receiving assistance with his or her case and benefit-related questions via NCSC.

USCIS also uses telephone numbers collected from NCSC to request voluntary participation in Customer Satisfaction Telephone Survey. During the callback, individuals are provided a notice with the purpose of the telephone survey, instructions on how to participate, and how to opt-out of future calls. USCIS further advises individuals who choose to provide feedback that their responses are anonymous, but used to help USCIS make informed decisions on customer support needs, potential system issues, future design priorities, and other concerns to better serve USCIS customers. USCIS will not request or collect PII during the telephonic survey.

Section 5.0 Data Retention by the project

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

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

USCIS is negotiating a retention schedule with NARA for NCSC and it is subject to final approval. USCIS deletes information collected through CRM at the end of each day. Phone



systems in call centers have the capability to record phone conversations. USCIS will delete phone records 90 days from the date of the call.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that PII is retained longer than necessary to fulfill specified purposes.

Mitigation: Although there is always risk inherent in retaining data for any length of time, the NCSC data retention periods are consistent with the concept of retaining data only for as long as necessary to support the agency's mission. The proposed NCSC retention and disposal schedule is based upon a need to keep the records available in case there are questions or complaints regarding a call. The drafted schedule complies with the requirements of the Federal Records Act and the stated purpose and mission of the systems.

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.

USCIS does not share information collected by the NCSC and its associated systems with external entities.

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

USCIS does not share information collected by the NCSC and its associated systems with external entities.

6.3 Does the project place limitations on re-dissemination?

USCIS does not share information collected by the NCSC and its associated systems with external entities.

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

USCIS does not share NCSC information with external entities.



6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk of unauthorized sharing of information.

Mitigation: USCIS mitigates this risk by implementing strong oversight procedures. Currently, USCIS does not routinely share information collected by the NCSC with external agencies. USCIS has formal review and approval process in place for new sharing initiatives. The proper review authorities must approve any new use of information or new access requests for the system. Any updates related to information sharing with external entities are reviewed prior to disclosure to ensure any instances of sharing are fully consistent with the BIS SORN.²⁶

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?

The NCSC allows an individual to directly engage with USCIS to amend an error in his or her application or check the status of his or her submission. Individuals seeking access or amend their USCIS records may file Freedom of Information Act (FOIA) or Privacy Act (PA) concern. Any individual seeking to access his or her USCIS record may submit a request to following address:

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

The process for requesting records can be found at 6 CFR § 5.21. The request should state clearly the information that is being contested, the reasons for contesting it, and the proposed amendment to the information. The procedures for making a request for access to one's records can also be found on the USCIS web site, located at www.uscis.gov.

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

The NCSC allows individuals to directly engage with USCIS to amend an error in their application or check the status of their submission. Individuals may also direct all requests to contest or amend information to the FOIA/PA Office at USCIS at the address listed above. In the redress request, individuals must state clearly and concisely the information being contested,

²⁶ DHS/USCIS-007 - Benefits Information System, 73 FR 56596 (September 29, 2008).



the reason for contesting it, and the proposed amendment to the information. Clearly mark the envelope “Privacy Act Amendment.”

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

USCIS notifies individuals of the procedures for correcting their information through this PIA and the BIS SORN.²⁷

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals do not have user access and ability to correct their record.

Mitigation: USCIS mitigates this risk by providing individuals multiple opportunities during and after the completion of the benefit request process to correct information. Customers may also contact the NCSC and report issues for as long as their cases are pending with USCIS. Although individual customers do not have access to USCIS case management systems, any information a customer finds on his or her immigration benefit documents (e.g., Permanent Resident Card, Travel Document, Employment Authorization Document) or identified during the call may be corrected by contacting the NCSC and explaining the error. A Tier 2 ISO can then provide information to the caller on the best way to correct the problem. Individuals may avail themselves of the redress and appeal process as stated in 6 CFR §§ 5.25-26. USCIS will review requests for access and appeal on a case-by-case basis.

Section 8.0 Auditing and Accountability

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

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

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

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

All USCIS employees and contractors are required to complete annual privacy and security awareness training. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and

²⁷ DHS/USCIS-007 - Benefits Information System, 73 FR 56596 (September 29, 2008).



administrative controls to safeguard information. In addition, both Tier 1 and Tier 2 personnel receive job-specific privacy training.

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

USCIS limits access to case management systems to USCIS employees. USCIS must grant an employee access and issue the employee a user name and password to gain access to the system. The information systems used to support NCSC employ role-based access controls so only employee users with a need-to-know have access. The employee's supervisor determines need-to-know based on the employee's job responsibilities. Moreover, the systems that support NCSC provide a warning banner at all access points to deter unauthorized use of information by internal users. The banner warns users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance.

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 information collected through the NCSC with organizations within or outside of DHS. However, USCIS has a formal review and approval process in place for any new sharing agreements. The proper authorities, including the USCIS Privacy Office, must approve any new use of information or new access requests for the system.

Responsible Officials

Donald Hawkins
Privacy Officer
United States Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

Original signed and on file with the DHS Privacy Office

Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security