



Privacy Impact Assessment  
for the

**Standard Management Analysis Reporting Tool  
(SMART)**

**DHS/USCIS/PIA-050**

**August 27, 2013**

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## Abstract

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS), Office of Information Technology (OIT) developed the Standard Management Analysis Reporting Tool (SMART) to create and compile reports pertaining to immigrant and nonimmigrant benefits. SMART creates reports by temporarily retrieving information from USCIS source systems to create reports, which have either aggregate or individual data. USCIS is conducting this Privacy Impact Assessment (PIA) to discuss the privacy risks and mitigations associated with replicating and temporarily retaining personally identifiable information (PII) in SMART to create reports.

## Overview

The Department of Homeland Security (DHS), United States Citizenship and Immigration Services (USCIS) collects, tracks, and stores large amounts of information related to administering and processing benefit requests for all immigrant and nonimmigrant benefits. The USCIS Office of Information Technology (OIT) developed the Standard Management Analysis Reporting Tool (SMART) to create and compile reports to track and monitor the status of immigrant and nonimmigrant benefit requests and to assist USCIS in the decision-making process relating to immigration cases, case file locations, and case metrics. SMART supports the USCIS mission by providing accurate and useful information to USCIS employees responsible for managing the integrity of the immigration system. SMART, a subsystem of the enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), queries information from multiple USCIS systems, and creates and compiles reports pertaining to immigration benefits or cases, alien file tracking, and/or naturalization, in one centralized location. Prior to SMART, in order to create reports, USCIS employees had to manually export information from multiple USCIS systems, located in different physical locations and that used different versions of database software. Employees had to separately access each system containing information necessary to complete the reports because the systems were unable to communicate with one another. After employees manually located the information, they would integrate it into a central location (e.g., Microsoft Excel spreadsheet or MS Access) to create a report.

For example, a USCIS Headquarters (HQ) office is responsible for producing monthly reports in order to identify files that are beginning to age. Prior to SMART, USCIS HQ created approximately 19 reports a month for field offices using Microsoft Excel, to better identify, troubleshoot, and manage old file workflow. They would download approximately 90 files from the National File Tracking System (NFTS), which took the office roughly four hours to complete. USCIS HQ personnel then used Microsoft Excel macros, a series of commands and functions, to consolidate the files by location in USCIS and then sort by the age of the file. Even using macros, the total process took about 15 hours each month. The implementation of SMART greatly alleviates this time consuming and labor intensive process.

SMART allows the USCIS HQ office to create the reports on-demand with no manual intervention. HQ users can now create the same reports by accessing NFTS information through a SMART system interface. Once they create the reports, the field offices can access the reports within



SMART. SMART greatly reduces the amount of time spent on a report by allowing users to access information and create reports in one centralized location.

### **SMART Source Systems**

SMART is an Oracle tool called Oracle Business Intelligence Enterprise Edition (OBIEE). SMART does not store any data. In order for SMART to be able to display the data to the end users via a report, SMART can obtain the data via two sources:

- eCISCOR
- Direct connection to the SMART source system

eCISCOR is a collection of databases that contains data from several USCIS systems. SMART can create reports using eCISCOR data or through a direct connection to multiple USCIS systems in order for users to create immigration reports without having to separately access each source system. These systems, called the SMART source systems, store information that is generally collected directly from individuals applying for a USCIS benefit. SMART, which has a read-only interface with these source systems, then temporarily retrieves the information to create and compile reports. Once the report is created and compiled, it is exported for further use by USCIS management. The data is not retained within SMART.

Although SMART communicates with these source systems, it only temporarily retrieves information. The temporary retrieval allows SMART to view the information in a read-only reporting format. These reports help end users to obtain, view, and analyze the information both at the summarized, aggregate, or detailed level, in which personally identifiable information (PII) may be included, depending on the user's needs.

A complete list of the source systems that have a direct connection to SMART, are included in Appendix A of this PIA. USCIS will update Appendix A as OIT adds additional SMART-system interfaces.

### **SMART Reports**

Within SMART, users can create either ad-hoc or use pre-defined reports to meet various reporting needs at USCIS. If users create an ad-hoc report, they can choose the information fields of interest to be included in their reports, or can choose to aggregate the information in the reports. Pre-defined reports allow users to create reports with pre-set criteria. Since SMART does not retain any source system information, a user opening a shared report re-queries the source system, which then updates the reports in real-time. Offices use SMART to create reports that assist with USCIS workload management. Offices cannot use SMART as a data mining tool to search across multiple systems to query particular individuals.

#### *Ad-hoc*

Ad-hoc reports allow users to build their own reports and specify data elements to be included. SMART users can create, organize, and share ad-hoc reports within SMART, but will only display the information from the source systems in a read-only format. For example, a user may access SMART to



create an ad-hoc report about employee misconduct that displays the number of allegations of employee misconduct regarding a specific employee, and organize the report by allegation type.

### *Pre-defined*

Offices may create pre-defined reports using specific criteria determined by business need, tasks, and user reporting requirements. SMART users cannot manipulate pre-defined reports to meet other reporting needs. For example, the USCIS National Benefits Center (NBC) uses pre-defined reports to compile certain case statistics, such as the number of adoption cases that USCIS receives each year. This report displays the pending statuses (e.g., pending assignment, pending request for evidence) and the average case processing days.

The use of ad-hoc or pre-defined reports varies on the user's needs and/or the user's type. There are three types of user groups for SMART:

**Standard user:** Standard users have very limited privileges within SMART. Standard users have read-only ability to run pre-defined reports that the Power user has created and saved. Standard users must use pre-determined criteria for their reports and cannot modify a report (i.e., they cannot add or remove fields defined in the report). However, these users can filter the information returned to the report, if needed.

**Power user:** Power users have the ability to create their own report dashboards, create ad-hoc reports, and to save the ad-hoc report for others to use as pre-defined reports. Power users typically create one or more pre-defined reports for a group of Standard users to use on a daily, weekly, monthly, etc. basis.

**Administrator:** The Administrator will have system privileges within SMART including access to pre-defined and ad-hoc reports. Only the SMART Development Team and identified USCIS SMART Administrators will have administrator access.

Below are examples of both ad-hoc and pre-defined reports that SMART can create, using aggregated or source system information:

- The number of applications filed in a given period of time;
- The number of applications that were filed per benefit type;
- The number of applications are pending, approved, or denied, per benefit;
- The location of particular applications, including the A-Numbers associated with the applications;
- The processing times for each application;
- The number of cases that exceeded the processing time;
- Specific immigration applications that have exceeded the designated processing times;
- The number of applications that were processed per hour;



- The average number of applications that were processed per hour (per division, team, and/or Officer);
- The number of forms associated with other forms prior to a particular date; and,
- The total number of forms by action status per regional center.

The amount of information included in a report varies by the user's business needs. Some users need elements of PII to be included in reports, while others do not. For example, some users create reports in which the USCIS application receipt number or customers' Alien number (A-number) must be included in the report (such as reports containing a customer's applications history, application location, etc.). Other reports do not require PII in reports and can aggregate the information. SMART users have the flexibility of tailoring the reports to fit their business needs.

Once a user creates a report and logs out or disables SMART, it automatically deletes the source system information and is no longer accessible. If the user chooses to print or save the reports, he or she may export and save the report in formats such as Microsoft Excel, Microsoft PowerPoint, Adobe PDF, and plain-text. USCIS departmental information management governance and security guidelines ensure that employees are aware of the importance of safe keeping and destroying the reports when they are no longer needed.

### **SMART Functionalities**

SMART organizes and displays USCIS source system information on pre-built standard dashboards and reports, helping users spend less time compiling reports and improve USCIS business results. SMART organizes dashboards by subject areas, such as source systems or offices. For example, if a user is looking for a report about adoption, he or she views the Adoption dashboard.

The first page, which displays after a user enters his or her credentials, is the My Dashboard page. This page is unique to each user account. SMART users are able to request the dashboards of their choice when submitting a SMART Access Request form. Dashboard access must be approved by the user's supervisor, and is granted to only users that have a need-to-know. Both the submitting user and the user's supervisor must agree the user has a need-to-know basis for accessing the requested source system's information via SMART.

After receiving access, if a user has a business need to create a report about adoption, he or she would select the Adoption dashboard. Upon accessing the dashboard, users select the Report Index page that identifies the types of reports. The text on the Report Index page describes the reports a user can choose to generate. For example, users can select the Adoption Application Page to create a report on adoption applications.

Once a user chooses the relevant page (such as the Adoption Application Page), the dashboard prompts users to select optional information filters (i.e., Receipt Date Range, Country type, Adjudicator, or Decision). When a user does not make a selection, the report will display all information for the entire filter. Each SMART dashboard is set up uniquely, but may include similar components. The user can then select the type of report he or she would like to create (e.g., Summary of Pending Application Processing Report, Summary of Completed Applications Report, and Summary of Request for Evidence (RFE)



Processing Report). The user can then select if he or she would like the report aggregated in a table or chart format. Once the user customizes the report, SMART generates and displays it.

As mentioned above, once a user logs off, SMART deletes the report information. If users would like to save the SMART reports, users can print or download the reports (in formats such as Microsoft Excel, PowerPoint, and Adobe PDF) to assist users with various business purposes.

## 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?

USCIS's legal authority for the collection and temporary retrieval of information in SMART is the Immigration and Nationality Act, 8 U.S.C. § 1103.

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

SMART uses information from the following SORNs:

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233;
- DHS/USCIS-004 - Systematic Alien Verification for Entitlements Program, September 21, 2011, 76 FR 58525;
- DHS/USCIS-005 - Inter-Country Adoptions Security, June 5, 2007, 72 FR 31086;
- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596;
- DHS/USCIS-010 - Asylum Information and Pre-Screening, August 8, 2012, 77 FR 47419;
- DHS-USCIS-011 - E-Verify Program System of Records, May 9, 2011, 76 FR 26738;
- DHS/USCIS-013 - E-Verify Self Check, February 16, 2011, 76 FR 9034;
- DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS), September 29, 2009, 74 FR 49882; and,
- DHS/ALL-020 - Department of Homeland Security Internal Affairs, November 18, 2008, 73 FR 67529.



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

A system security plan (SSP) for SMART is complete. SMART is a sub-system to eCISCOR, and therefore operates under the eCISCOR authority to operate (ATO). eCISCOR's ATO was granted December 19, 2012, for a period of 18 months. The eCISCOR ATO expires on June 19, 2014. The eCISCOR Security Plan was completed on September 18, 2012.

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

SMART displays read-only information from existing systems for reporting purposes. The users retain reports for business purposes and then destroy them when no longer needed in accordance with NARA's General Record Schedule 20, Item 16.

### **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.**

SMART is not subject to PRA requirements because it receives information from various source systems that are responsible for their own compliance with the PRA.

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

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

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

SMART retrieves and displays information from each source system based on the query. Appendix B provides a detailed list of data elements that can be displayed via SMART from the connected source systems. This information may include, but is not limited to: the applicant's name, Social Security Number (SSN), gender, date of birth, residence address, phone number, e-mail address, certificate of citizenship number, naturalization certificate number, A-number, and name of employee processing the file. SMART does not maintain any of the information generated during a query and displays information in a read-only format.

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

SMART does not collect information directly from the individual. It retrieves read-only information from various USCIS source systems. Most of the information in the source systems is



collected directly from the individual and is transferred from the source system to SMART in real-time. A complete list of the systems that provide information to SMART is in Appendix A.

USCIS may add SMART source systems in the future to allow users to create additional reports. If this occurs, USCIS will update the PIA appendices to discuss the privacy implications of the additional source system.

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

SMART does not collect, use, or maintain commercial or publicly available information, as described in this PIA. However, some of the SMART source systems may collect, use and/or maintain commercial sources or publicly available information.

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

SMART assumes the information it generates from source systems is accurate. SMART queries source systems in real-time to ensure the information is current and up-to-date. SMART is not the original point of collection for the information generated in the reports it provides to its users. The accuracy of SMART reports is dependent on the accuracy of source system information. If the user questions the accuracy of the information, he or she should refer to the source system or data owner for validity.

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

**Privacy Risk:** In developing SMART, there was a risk that SMART could copy and retain all ingested data.

**Mitigation:** This risk was mitigated because SMART was not designed to collect or store any information. Instead, SMART temporarily retrieves information from the SMART source systems to create reports. Once SMART generates the report, and the user signs out, SMART deletes the information.

## **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.**

USCIS collects, tracks, and stores large amounts of information related to administering and processing applications for all immigrant and nonimmigrant benefits. SMART specifically uses the information to create and compile reports to assist in the workload management decision-making process relating to immigration cases, case file locations, and case metrics.



SMART queries the source systems to compile reports that provide USCIS with a better view and understanding of USCIS information. The type of information queried varies based on the type of reports. SMART helps end users to obtain, view, and analyze the information in report formats.

### **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.**

SMART is a reporting application that USCIS uses to organize and model information to help end users to obtain, view, and analyze the information in report formats. Although it is not the primary function of the tool, when the data is displayed in a report format, users may be able to discover anomalies and patterns in sources systems and to work with the specific source system to correct it. SMART reports are generated to assist with USCIS workload management and are not used as data mining tools to search across multiple systems to query particular individuals.

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

SMART only interacts with USCIS systems. Therefore, there are no components with assigned roles and responsibilities in the system.

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

**Privacy Risk:** SMART users could exceed their authority and use the information in SMART for unofficial purposes.

**Mitigation:** SMART temporarily retrieves information from USCIS source systems to create and compile reports. Depending on user access, SMART users can either create ad-hoc and/or pre-defined reports. Standard users can only create pre-defined reports while Power users, who generally have a better understanding of the source systems and the information contained in them, can create ad-hoc reports and build pre-defined reports for other users. Due to their understanding of the source systems, they can build reports that contain only the necessary information needed for the report.

Furthermore, prior to accessing SMART, USCIS employees receive training on the use of information in accordance with DHS policies, procedures, regulations, and guidance. SMART keeps audit logs of users' activities while utilizing the application, which can be reviewed for potential misuse of the system.

## **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.**

SMART does not provide specific notice prior to the collection of information because SMART is not the original point of collection. General notice is provided to individuals on the USCIS forms (the original point of collection), the associated source system System of Records Notices (SORN), and this PIA.

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

USCIS presents applicants who seek USCIS benefits with a Privacy Act Notice and a signature release authorization on benefit request forms. The Privacy Act Notice details the authority and uses of information. The applicant signs the form indicating that he certifies and authorizes the release of any information from his or her record that USCIS needs to determine eligibility for the requested benefit. USCIS notifies the applicant at the point of information collection (generally on the form itself) that it is within his or her rights to decline to provide the required information. However, failure to provide the required information will result in the denial of the applicant's benefit request.

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

**Privacy Risk:** Since SMART is not the source system of collection, there is a risk that individuals will not receive notice of purposes for which SMART uses their information.

**Mitigation:** USCIS provides the individual notice through the original point of collection, this PIA, and the applicable SORN(s). USCIS provides notice to individuals applying for benefits that USCIS uses their information to determine whether they are eligible for their respective benefit. The immigration file is necessary for the benefits adjudication process.

### **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.**

SMART is a tool that displays read-only information from existing systems for reporting purposes.

Once a user logs out or disables his or her SMART session, the information is no longer accessible. However, users have the capability to export and save the report information in several formats, such as Microsoft Excel, Microsoft PowerPoint, Adobe PDF, and plain-text or print the reports. These reports are destroyed by the authorized user when no longer needed to conduct business in accordance with General Record Schedule 20, Item 16.



## 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** Although SMART only displays information in read-only format and does not store the information on the system itself, there is a risk that users may retain SMART report information for longer than necessary

**Mitigation:** Although there is always an inherent risk in retaining information for any length of time, the SMART source system information retention periods are consistent with the concept of retaining information only for as long as necessary to support the agency's mission. Additionally, authorized users who download or print reports will destroy the reports once the user fulfills his or her business requirement or when no longer needed. Furthermore, all USCIS employees are required to complete the USCIS Basic Records Management course on an annual basis, which provides guidance on records maintenance, use, and disposition.

## 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.**

SMART reports are not shared outside of DHS. Any external information sharing is done directly through the source systems from which SMART information is derived. For a full discussion of the external sharing of the SMART source systems, please visit the corresponding source system PIA and SORN, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

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

SMART reports are not shared outside of DHS. Any information sharing with other entities is done through the source systems from which SMART information is derived. Each SMART source system has a corresponding SORN. For detail regarding the compatibility of external sharing for each source system, please visit their respective SORNs, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

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

SMART does not share information externally and does not, as a system, re-disseminate information.

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

SMART does not share information externally.



## 6.5 Privacy Impact Analysis: Related to Information Sharing

SMART does not share information externally.

## 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?**

To obtain access to his or her information, the individual would have to make either a Freedom of Information Act or Privacy Act request. Individuals who are seeking information pertaining to them are directed to clearly mark the envelope and letter "Privacy Act Request." Within the text of the request, the subject of the record must provide his/her full name, date and place of birth, and notarized signature, and any other information that may assist in identifying and locating the record, and a return address. For convenience, individuals may obtain Form G-639, *FOIA/PA Request*, from the nearest DHS office, to submit a request for access. The procedures for making a request for access to one's records can be found on the USCIS website, located at [www.uscis.gov](http://www.uscis.gov).

An individual that would like to file a FOIA/PA request to review his or her USCIS record may do so by sending the request to the following address:

U.S. Citizenship and Immigration Services  
National Records Center  
FOIA/PA Office  
P O Box 648010  
Lee's Summit, MO 64064-8010

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

Information in SMART is extracted information from other systems. Individuals may direct all requests to contest or amend information to the FOIA/PA Office at USCIS. They must state clearly and concisely in the redress request the information being contested, the reason for contesting it, the proposed amendment, and clearly mark the envelope "Privacy Act Amendment."



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

USCIS application instructions, the USCIS website, this PIA, and any associated SORNs notify individuals of the procedures for correcting their information.

### 7.4 Privacy Impact Analysis: Related to Redress

**Privacy Risk:** There is a risk that USCIS may not afford an individual adequate opportunity to correct information that SMART maintains.

**Mitigation:** The PII used by SMART is obtained by other USCIS source systems. Individuals are given numerous opportunities during and after the completion of the benefit request process to correct information they have provided and to respond to information received from other sources. USCIS does not claim any Privacy Act exemptions for SMART and therefore individuals may submit a redress request or appeal as stated in the DHS Privacy Act regulations.<sup>1</sup>

## 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?

To obtain access to SMART, each SMART user must submit a supervisor-approved SMART access request to a SMART administrator. Access to SMART is on a need-to-know basis that is determined by the individual's current job function. Moreover, access privileges for users is limited by ensuring they have authorized logon credentials (i.e., USCIS-issued user id and password) through a Microsoft Active Directory System Interface.<sup>2</sup> SMART accounts are managed in conjunction with an employee's Active Directory account. If an employee changes his or her Active Directory password, his or her SMART password will also be changed. Furthermore, if an employee leaves the agency, his or her SMART account will be deleted in conjunction with the deletion of their Active Directory profile.

There are three types of user groups for SMART and the user groups will determine the access privileges within SMART.

**Standard user:** The Standard user will have very limited privileges within SMART. This user group will have read-only ability to run pre-defined reports that have been created and saved by a Power

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<sup>1</sup> See 6 C.F.R. § 5.21 (2011).

<sup>2</sup> Microsoft Active Directory services manages all local area network (LAN) user accounts with standard security group policy settings. The USCIS Directory Services platform provides a centralized Lightweight Directory Access Protocol (LDAP) directory that is directly leveraged by the USCIS end users as a primary directory authentication platform, as well as application systems that provide USCIS with capabilities extending to a single authoritative authentication and identification mechanism.



user. Standard users cannot modify a report definition (i.e., they cannot add or remove fields defined in the report). However, they do have the ability to filter the information returned to the report, if needed. The user's role will determine what read-only reports are visible to them. Standard users will have the ability to refresh, print, and download reports to which they have access.

**Power user:** Power users have more privileges within SMART than Standard users. These users are considered to be more advanced in SMART with understanding of both source systems and the associated information. Power users have the ability to create a report from scratch (ad-hoc report) and to save that report definition for themselves and others (pre-defined report). Power users typically create one or more pre-defined reports for a group of Standard users to use on a daily, weekly, monthly, etc. basis. When creating these reports, Power users create report definitions that allow Standard users to select information from one or more source system. Power users can then save these report definitions (a list of desired fields from the source systems) inside their SMART dashboards.

**Administrator:** The Administrator will have system privileges within SMART including access to pre-defined and ad-hoc reports. Only the SMART Development Team and identified USCIS SMART Administrators will have administrator access.

Additionally, the SMART team can audit user access requests, by a form users scan and email to a central email box. At the system level, SMART produces auditable system logs, which indicate successful and failed logins as well as specifics about the queries ran. SMART can also audit the list of registered users and each user's access permissions.

From a technical safeguards perspective, only USCIS users with a valid need-to-know and account can access SMART. If that account is expired or deleted at the USCIS level, that user will not be able to log in to SMART. SMART auditing does not include the ability to identify specific records each user can access, but audits can include the ability to identify subject areas each user can access. SMART conducts self-audits by reviewing logs, permissions, and access forms.

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

In order to receive and maintain access to USCIS systems, each employee is required to undergo initial and annual refresher security and privacy awareness trainings that address his or her duties and responsibilities to protect the information. These trainings include guidance on federal laws, policies, and regulations relating to privacy and information integrity, as well as the handling of Sensitive but Unclassified/For Official Use Only Information. The USCIS OIT IT Security office and the USCIS Office of Privacy verify that employees successfully completed the trainings and maintain a record of certificates on all USCIS employees and contractors.

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

SMART establishes access and security controls to mitigate privacy risks associated with authorized and unauthorized users, namely providing access to SMART on a need-to-know basis per



subject area, (which is associated to a source system). The SMART team grants access only to individuals who have a valid business need to access SMART for their official duties, as determined by the user's supervisor. All authorized users must authenticate using a user ID and password. SMART uses role-based user accounts to minimize the number of employee's with access to the system. SMART maintains audit trails in order to track and identify unauthorized uses of system information.

Furthermore SMART complies with the DHS security guidelines, which provides criteria for securing networks, computers, and computer services against attack, and unauthorized information dissemination.

Each SMART user must submit a SMART supervisor-approved access request to a SMART Administrator to obtain access to SMART. Only employees with a valid need-to-know have access to SMART in order to perform their official duties. A typical transaction begins when a user accesses SMART through the internet web browser within the USCIS network and provides a username and password.

### **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?**

SMART does not share information outside of USCIS, so there are no MOUs or other sharing agreements with other agencies. Within USCIS, however, all of SMART's information source systems (Section 2.2) have an Interface Control Agreement with SMART itemizing each data element sent to SMART for read-only reporting.

## **Responsible Officials**

Donald K. 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.

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Jonathan R. Cantor  
Acting Chief Privacy Officer  
Department of Homeland Security



## APPENDIX A Interconnected Systems

Below are the systems that provide information to SMART to create reports. This appendix includes a description of the source system and their associated compliance documentation.

**Adoption Case Management System (ACMS)** is a web-based application used by the National Benefits Center (NBC) and is designed to facilitate efficient processing of both Hague and non-Hague adoption applications.<sup>3</sup>

**PIA:**

- In development.

**SORN:**

- DHS/USCIS-005 - Inter-Country Adoptions Security, June 5, 2007, 72 FR 31086.

**Central Index System (CIS)** contains information on the status of 57 million applicants/petitioners seeking immigration benefits, including: lawful permanent residents, naturalized citizens, U.S. border crossers, aliens who illegally entered the U.S., aliens who have been issued employment authorization documents, individuals who petitioned for benefits on behalf of family members, and other individuals subject to the provisions of the Immigration and Nationality Act.

**PIA:**

- DHS/USCIS/PIA-009 - Central Index System (CIS).

**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233.

**Case & Activity Management for International Operation (CAMINO)** is a web-based application designed to facilitate the processing of immigration applications and petitions sent to overseas offices and domestic branches of USCIS Headquarters International Operations Division (IOD). In addition, the application provides the ability for IOD to facilitate, at all levels, the management of its overseas casework.

**PIA:**

- In development.

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<sup>3</sup> The Hague Convention on Inter-country Adoption is an international agreement between participating countries on best adoption procedures. These procedures have two goals in mind: the best interest of the children and the prevention of abduction, exploitation, sale, or trafficking of children. All adoption applications under the Hague Convention are filed with the NBC, regardless of the applicant's place of residence.



**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233; and
- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.

**Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)** consolidates and manages immigration and naturalization information from several USCIS information systems, reducing the labor involved in accessing, reporting, and sharing information.

**PIA:**

- DHS/USCIS/PIA-023 – eCISCOR.

**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233; and
- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.

**Humanitarian Adjudication for Victims Enterprise Nationwide (HAVEN)** is a centralized case management system and tracking database to support the processing of immigration petitions under the Victims of Trafficking and Violence Protection Act of 2000 (VTVPA). HAVEN specifically tracks adjudicative actions taken on T and U nonimmigrant visas.

**PIA:**

- In development.

**SORN:**

- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.

**Interim CLAIMS (iCLAIMS)** processes, tracks, and stores information related to administering the Investor Pilot Program.<sup>4</sup>

**PIA:**

- In development.

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<sup>4</sup> Section 203(b)(5) of the Immigration and Nationality Act (INA), allocates 10,000 “Employment Based-5 (EB-5)” immigrant visas per year as part of the Immigration Investor Pilot Program. 3,000 of the 10,000 visas are reserved for aliens who invest in targeted employment areas (TEA), and 3,000 of the 10,000 visas are reserved for aliens who invest in commercial enterprises affiliated with Regional Centers. A Regional Center is defined as any economic entity, public or private that is involved with the promotion of economic growth, improved regional productivity, job creation, and increased domestic capital investment. EB-5 Investors may be eligible for an EB-5 immigrant visa if they have invested – or are actively in the process of investing – the required amount of capital into one of the following for-profit business-types: a new commercial enterprise (created after 11/29/1990); an enterprise that will expand to 140% of pre-investment net worth or number of employees; or a troubled business in which jobs will be preserved.



**SORN:**

- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.

**Investigations Division Case Management System (IDCMS)** is an electronic case management system that is used to manage information relating to investigations of allegations of misconduct, corruption, and fraud involving any USCIS employee or contractor that is not subject to investigation by the DHS Office of the Inspector General. IDCMS provides reporting and query capabilities, alert, and email notification.

**PIA:**

- In development.

**SORN:**

- DHS/ALL-020 - Department of Homeland Security Internal Affairs, November 18, 2008, 73 FR 67529.

**National File Tracking System (NFTS)** is an automated file-tracking system used to maintain an accurate file inventory and track the physical location of files. This system facilitates USCIS's ability to efficiently manage and streamline access to the millions of immigration files under its control.

**PIA:**

- DHS/USCIS/PIA-032- National File Tracking System (NFTS).

**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233.

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

**PIA:**

- DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3).

**SORN:**

- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.



**Quality Unit End User Evaluation (QUEUE)** is used to electronically generate a statistically valid sampling of the Customer Relationship Interface System (CRIS)/ Service Request Management Tool (SRMT) responses that have been fulfilled over a specified period.

**PIA:**

- In development.

**SORN:**

- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596; and
- DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792.

**Scan on Demand Application (SODA)** converts paper Alien files to digitized files when the file is requested by an authorized user to serve an agency purpose.

**PIA:**

- DHS/USCIS/PIA-003 - Integrated Digitization Document Management Program (IDDMP).

**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233.

**Validation Instrument for Business Enterprises (VIBE)** uses commercially available information from an independent information provider to validate basic information about companies or organizations petitioning to employ certain alien workers.

**PIA:**

- In development.

**SORN:**

- DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, June 13, 2011, 76 FR 34233;
- DHS-USCIS-006 - Fraud Detection and National Security Information System (FDNS), August 18, 2008, 73 FR 48231; and
- DHS-USCIS-007 - Benefits Information System, September 29, 2008, 73 FR 56596.

**Verification Information System (VIS)** is the technical infrastructure that enables USCIS to operate Systematic Alien Verification for Entitlements (SAVE) and E-Verify. VIS is a nationally accessible database of selected immigration status information containing in excess of 100 million records. Government agencies use SAVE information to help determine whether a non-citizen is eligible for any public benefit, license, or credential based on citizenship and immigration status. Private employers and



government users use E-Verify information to determine whether a newly hired employee is authorized to work in the United States.

**PIA:**

- DHS/USCIS/PIA-006 - Systematic Alien Verification for Entitlements (SAVE) Program; and
- DHS/USCIS/PIA-030 - E-Verify Program.

**SORN:**

- DHS/USCIS-004 – Systematic Alien Verification for Entitlements Program, September 21, 2011, 76 FR 58525; and
- DHS-USCIS-011 – E-Verify Program System of Records, May 9, 2011, 76 FR 26738.



## APPENDIX B

### Source System Data elements

#### **Adoption Case Management System (ACMS):**

SMART retrieves the following information from ACMS: adjudication information (e.g., date, expiration date, created date, decision date, receipt date), adjudicator information (e.g., username, full name), adoption agency name, application full name, applicant full address, A-number, place of birth, applicant province, SSN, case number, country of adoption, decision information, form information, Request For Evidence information, processing times, and attorney information.

#### **Central Index System (CIS)**

SMART retrieves the following information from CIS: A-Number, first name, last name, date of birth, class of admission, country of birth, creation date of file, and the FCO (local file control offices) where the file is located, SSN (or other unique identifying number issued by a governmental entity), Derivative Citizenship Number (DA), Naturalization Certificate Number (C-Number), Mother's and Father's Name, aliases, port of entry, and driver's license number (if applicable).

#### **Computer-Linked Application Information Management System 3 (CLAIMS 3):**

SMART retrieves information from CLAIMS 3 through eCISCOR; please see a description of the data elements in the eCISCOR section below.

#### **Computer-Linked Application Information Management System 4 (CLAIMS 4):**

SMART retrieves information from CLAIMS 4 through eCISCOR; please see a description of the data elements in the eCISCOR section below.

#### **Case & Activity Management for International Operation (CAMINO):**

SMART retrieves the following information from CAMINO: background check status, processing times, case information, country of citizenship, consular information, interview information, petitioner information, e-mail address, fax number, address, A-number, country of birth, gender, immigration status, fingerprint examination information, and date of birth.

#### **Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR):**

SMART retrieves CLAIMS 3 and 4 information through eCISCOR. The information retrieved includes: receipt number, attorney information, A-number, class expiration date, country of birth information, class of admission, date of birth, full name, date of last arrival, SSN, beneficiary immigration information, beneficiary address information, form number, petitioner immigration status, petitioner address information, valid to/from dates, citizenship country information, immigrant/non-immigrant status code, family information, case status information, applicant address information, e-mail address, gender, height, marital status, phone number, permanent resident date, application fee information, interview information, and region information.



## **Humanitarian Adjudication for Victims Enterprise Nationwide (HAVEN):**

SMART retrieves the following information on both principal and derivative applicants from HAVEN: full name, I-94 number, A-number, class expiration date, country of birth information, class of admission, date of birth, date and place of last entry, gender, marital status, SSN, form number, immigration status, address, valid to/from dates, citizenship information, immigrant/non-immigrant status code, family information, case status information, FBI Number, State Identification (SID) Number, and description of the crime.

## **Interim Claims (iCLAIMS):**

SMART retrieves the following information from iCLAIMS: full name, receipt number, receipt date, date of birth, fax number, telephone number, web address, address, date of birth, fax number, name of commercial enterprise, commercial enterprise full address, business name and business full address, fee receipt, visa classification, priority date, country of birth, SSN, A-Number, arrival date, I-94 number, current nonimmigrant status, date current nonimmigrant status expires, spouse's full name, spouse's date of birth, spouse's gender, spouse's A-Number, spouse's current immigration status, date of marriage, spouse's aliases, children's full name, children's address, children's A-Number, children's current immigration status, and children's date of birth.

## **Investigations Division Case Management System (IDCMS):**

SMART retrieves the following information from IDCMS: information on allegations, associated party disposition, disposition actions, address, full name, location information, e-mail address, phone number, nationality, office address and phone number, last four digits of SSN, position/title, incident information, reference full name, case information, evidence, and complaint information.

## **National File Tracking System (NFTS):**

SMART retrieves the following information from NFTS: full name; complete address; priority status; postal code; third party information; number of files lost, retired, audited, forwarded, transferred, combined, consolidated, migrated, and received; country code; and region.

## **National Benefits Center (NBC) Process Workflow Repository (NPWR):**

SMART retrieves the following information from NPWR: full name, complete address, date of birth, city of birth, state of birth, country of birth, whether sponsor is U.S. Citizen or Lawful Permanent Resident, employment status (i.e., employed, self-employed, retired, unemployed), individual income, individual assets, relationship of household member to sponsor, and A-number.

## **Quality Unit End User Evaluation (QUEUE):**

SMART does not retrieve PII from QUEUE, only statistical information.



**Scan On Demand Application (SODA):**

SMART retrieves the following information from SODA: number of files processed, submitted, accepted, rejected, viewed; average number of files; pages per file; A-number; and current location.

**Validation Instrument for Business Enterprises (VIBE):**

SMART retrieves the following information from VIBE: date added to VIBE, form type, status, receipt date and number, time stamp, company name and address, fax number, and phone number.

**Verification Information System (VIS):**

SMART retrieves the following information from VIS: address, receipt number, visa type, username, address, employer, location, e-mail address, fax number, phone number, case number, class of admission code, employer contact information, employer address, status, Social Security Administration case information, benefit information, class of admission, date of birth, entry date, SAVE mismatch code, document information, passport information, Student and Exchange Visitor Information System information, third party company information, visa information, I-94 number, state code, state document, state entry date, and state document issued date.