



# Privacy Impact Assessment

for the

## Immigrant Military Members and Veterans Initiative (IMMVI)

DHS Reference No. DHS/ALL/PIA-092

January 26, 2022



Homeland  
Security



## Abstract

On February 2, 2021, President Biden signed Executive Order 14012, *Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans*.<sup>1</sup> In support of Executive Order 14012, on July 2, 2021, the Secretaries of the Department of Homeland Security (DHS) and Veterans Affairs (VA) announced a new joint initiative, the Immigrant Military Members and Veterans Initiative (IMMVI).<sup>2</sup> This initiative was formed to support the Nation's noncitizen service members, and their immediate family members, and directed DHS and the VA to identify and prioritize the return of current and former U.S. military members, and their immediate family members, who were removed from the United States, to ensure they receive the benefits to which they may be entitled. This Privacy Impact Assessment (PIA) analyzes the privacy risks associated with the personally identifiable information (PII) collected as part of this effort and documents the mitigation strategies implemented to ensure adequate protection of those individuals' privacy.

## Introduction

On July 2, 2021, the Secretary of the DHS, Alejandro N. Mayorkas, and the Secretary of the VA, Denis R. McDonough, formally announced the IMMVI to enhance collaboration and streamline processes to ensure the goals of the Executive Order were realized. Following the announcement, U.S. Immigration and Customs Enforcement (ICE), U.S. Citizenship and Immigration Services (USCIS), and U.S. Customs and Border Protection (CBP) provided a memorandum to the DHS Secretary outlining their commitment to the IMMVI objectives. More specifically, this included plans to:

1. Establish internal mechanisms that ensure robust interagency coordination with appropriate agencies to support current and former members of the U.S. military with immigration related applications and to facilitate the receipt of VA benefits to which they are entitled.
2. Establish a DHS Military Resource Center to assist noncitizen current and former service members and immediate family members with issues related to immigration applications and benefits.

As part of this effort, IMMVI is developing a new website application (the IMMVI Veterans Portal), which will allow for self-disclosure to the U.S. government of the necessary information

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<sup>1</sup> See Executive Order 14012, *Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans*, 86 Fed. Reg. 8277 (February 2, 2021), available at <https://www.federalregister.gov/documents/2021/02/05/2021-02563/restoring-faith-in-our-legal-immigration-systems-and-strengthening-integration-and-inclusion-efforts>.

<sup>2</sup> See <https://www.dhs.gov/news/2021/07/02/dhs-va-announce-initiative-support-noncitizen-service-members-veterans-and-immediate>.



to determine the type of assistance needed by the veteran. Individuals may submit information directly through the IMMVI Veterans Portal. Submitters may include noncitizen current and former U.S military members or their legal representatives. Information may include the veteran's name, A-number, date of birth, dates of military service, receipt numbers for applications filed with DHS, contact information, and general description of the issue/concern to be addressed. This information will allow IMMVI to direct the individual's case to the appropriate entity (e.g., the VA), along with providing better understanding of the number of noncitizen current and former U.S. military members in need of support.

IMMVI will use a USCIS-hosted Salesforce customer relationship management (CRM) platform that will function as both the front-end portal for collection and the back-end "case management system." The submissions received through the IMMVI Veterans Portal will be maintained in a separate instance and only be accessible to the IMMVI team (and technical/administrative personnel);<sup>3</sup> other USCIS Salesforce platform users will not have access to the information.

## **IMMVI Veterans Portal Workflow**

The following is a simplified workflow description of the IMMVI process:

- When individuals navigate to the IMMVI Veterans Portal, they are asked qualifying questions to validate they are a noncitizen current or former U.S military member as inquiries using this webform are limited to this group.
  - If they do not qualify, they are redirected away from the application process to the IMMVI Online Resource Center (<https://dhs.gov/immvets>) and no information about that individual is maintained.
- If the individual is a current or former U.S military member seeking to return to the United States, they are routed to a webform where they are asked to complete several fields pertaining to their biographic information, military service, and immigration status/concerns.
  - The individual validates the authenticity and accuracy of the data provided by formally submitting the webform and then receives a confirmation regarding the submission.

Once the information is formally submitted through the IMMVI Veterans Portal, it is automatically routed to the Salesforce platform through a direct interconnection. A case record is created for IMMVI analysts to review, route to the appropriate agency as necessary, and document the status

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<sup>3</sup> The IMMVI team consists of DHS Headquarters and appropriate Component personnel who have been assigned to this initiative.



and eventual outcome.<sup>4</sup> The submitted information is checked automatically against USCIS's Person Centric Query Service (PCQS).<sup>5</sup> The Person Centric Query Service allows users to submit a single query and view all transactions involving a noncitizen across multiple DHS and external systems. The system returns a consolidated view of the individual's past interactions with DHS Components and other U.S. agencies as the individual passed through the U.S. immigration system. Although the Person Centric Query Service can pull data from numerous source systems, the IMMVI effort is only pulling data from five USCIS source systems: Computer Linked Application Information Management System (CLAIMS 4),<sup>6</sup> Computer Linked Application Information Management System (CLAIMS 3),<sup>7</sup> Electronic Information System (ELIS),<sup>8</sup> Central Index System (CIS),<sup>9</sup> and RAILS.<sup>10</sup> IMMVI uses the data from the Person Centric Query Service check to populate the case record of the individual.

An IMMVI analyst is assigned to the case to assist with routing the individual's submission to the appropriate agency based on the information provided through the IMMVI Veterans Portal and the results and information from the Person Centric Query Service check. For example, the IMMVI team can review the individual's information and determine that they need to submit a certain form to USCIS. The IMMVI team can communicate that back to the individual or route the information directly to USCIS to assist.

- If the individual's information is inaccurate/incomplete or it is determined they are not a noncitizen current or former U.S. military member, they are notified and referred to the IMMVI Online Resource Center.

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<sup>4</sup> No adjudicative decisions or determinations are made within the Salesforce platform. The system is only used to track the dispositions made by the appropriate agency, as explained below.

<sup>5</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE PERSON CENTRIC QUERY SERVICE (PCQS), DHS/USCIS/PIA-010, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

<sup>6</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM (CLAIMS 4), DHS/USCIS/PIA-015, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

<sup>7</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM (CLAIMS 3), DHS/USCIS/PIA-016, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

<sup>8</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ELECTRONIC INFORMATION SYSTEM (ELIS), DHS/USCIS/PIA-056, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

<sup>9</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM (CIS), DHS/USCIS/PIA-009, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

<sup>10</sup> See DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR RAILS, DHS/USCIS/PIA-075, available at <https://www.dhs.gov/uscis-pias-and-sorns>. RAILS is not an acronym.



- If the individual is determined to be a noncitizen current or former member of the U.S. military, the IMMVI analyst routes the case to the appropriate agency.<sup>11</sup>
  - If the individual is seeking relief based on a non-DHS concern (e.g., Veterans Affairs benefit), their case is routed to the appropriate agency, after any necessary consent forms are completed and submitted. These non-DHS agencies undertake their own established processes to consider individual applications that are outside of the IMMVI purview and covered by their own privacy compliance documentation.
  - If the individual is seeking relief based on a DHS concern (e.g., humanitarian parole), their case is routed to the appropriate agency within DHS (e.g., USCIS, ICE, CBP). These Components undertake their own established processes to consider individual applications that are outside of the IMMVI purview and covered by Components' privacy compliance documentation.

The IMMVI analyst will work to notify the applicant on next steps and outcomes throughout this process. For example, the IMMVI analyst may contact the current and former U.S. military members or their legal representatives to provide the information needed to pursue their case, including information about application filing procedures with DHS. The individual's case will be tracked internally through the Salesforce platform, which utilizes a built-in "response builder" allowing for all communications to be stored on the platform, rather than having to communicate with the individual through DHS email accounts. If additional information is needed to properly direct the veteran, it can be requested through the response builder.

Once the appropriate agency has made a determination about the individual's case, that disposition will be provided back to IMMVI to be added to the individual case record.

## **Fair Information Practice Principles (FIPPs)**

The Privacy Act of 1974<sup>12</sup> articulates concepts of how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. The Homeland Security Act of 2002 Section 222(2) states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974.<sup>13</sup>

In response to this obligation, the DHS Privacy Office developed a set of Fair Information Practice Principles (FIPPs) from the underlying concepts of the Privacy Act to encompass the full

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<sup>11</sup> If there is an issue with data accuracy, the IMMVI analyst can work with the applicant (or their legal representative) or the data available to them through the Salesforce platform to deconflict any issues.

<sup>12</sup> 5 U.S.C. § 552a.

<sup>13</sup> 6 U.S.C. § 142(a)(2).



breadth and diversity of the information and interactions of DHS.<sup>14</sup> The Fair Information Practice Principles account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure.

DHS conducts Privacy Impact Assessments on both programs and information technology systems, pursuant to the E-Government Act of 2002, Section 208<sup>15</sup> and the Homeland Security Act of 2002, Section 222.<sup>16</sup> Given that IMMVI is a program rather than a particular information technology system, this Privacy Impact Assessment is conducted as it relates to the DHS construct of the Fair Information Practice Principles. This Privacy Impact Assessment examines the privacy impact of IMMVI as it relates to the Fair Information Practice Principles.

## 1. Principle of Transparency

*Principle:* DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a SORN and PIA, as appropriate.

The July 2, 2021, announcement by the Secretary of Homeland Security and Secretary of Veterans Affairs established IMMVI to support the Nation's noncitizen U.S. military members, veterans, and their immediate families. In addition, the IMMVI team organized two engagements and individual meetings with critical public stakeholders that also provided a significant amount of information about the initiative. This Privacy Impact Assessment also provides notice of this effort and the type of information that may be collected to fulfill the responsibilities laid out in the July 2<sup>nd</sup> announcement.

The IMMVI team has also developed the IMMVI Online Resource Center (<https://dhs.gov/immvets>) to assist noncitizen current and former U.S. military members, and their family members, with issues related to immigration applications and benefits.

**Privacy Risk:** There is a risk that an individual will not understand that submitting their information through the IMMVI Veterans Portal is not the same as filing an immigration related request with a DHS Component to determine their eligibility.

**Mitigation:** This risk is mitigated. DHS provides a Privacy Act Statement on the portal that applicants must acknowledge during the submission process. Specifically, the statement indicates that, "By registering and submitting your information to this website you are not applying for a visa, other documentation, admission into the United States, or any other immigration benefit." In addition, this Privacy Impact Assessment, associated System of Records Notice:

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<sup>14</sup> U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY POLICY GUIDANCE MEMORANDUM 2008-01/PRIVACY POLICY DIRECTIVE 140-06, THE FAIR INFORMATION PRACTICE PRINCIPLES: FRAMEWORK FOR PRIVACY POLICY AT THE DEPARTMENT OF HOMELAND SECURITY (2008), available at <https://www.dhs.gov/privacy-policy-guidance>.

<sup>15</sup> 44 U.S.C. § 3501 note.

<sup>16</sup> 6 U.S.C. § 142.



DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,<sup>17</sup> and the numerous outreach efforts that the IMMVI team has conducted inform the public of the purpose of this effort.

## 2. Principle of Individual Participation

*Principle:* DHS should involve the individual in the process of using PII. DHS should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of PII and should provide mechanisms for appropriate access, correction, and redress regarding DHS's use of PII.

One of the main goals of IMMVI overall is to provide additional transparency into processes to assist the Nation's noncitizen current and former service members and their immediate family members in seeking relief. The creation of the IMMVI Veterans Portal is one of the key measures this effort is using to make those processes available. The portal explicitly asks individual applicants (e.g., current and former U.S. military members or their immediate family members) or their legal representatives for the information collected. Submitters are required to validate the authenticity and accuracy of the data provided by formally submitting through the portal.

Individuals are provided a Privacy Act Statement explaining how the information will be used and consent to the Department's collection of their personally identifiable information by voluntarily providing it through the IMMVI Veterans Portal.

Further, any individual seeking access to or amendment of their records may submit a request in writing to the DHS Chief Privacy and Chief Freedom of Information Act (FOIA) Officer at the address below, or to the respective Component's Freedom of Information Act officer, which can be found at <https://www.dhs.gov/foia-contact-information>. DHS also accepts Privacy Act and Freedom of Information Act requests submitted electronically at <https://www.dhs.gov/dhs-foia-privacy-act-request-submission-form>.

Chief Privacy and Chief Freedom of Information Act Officer  
Privacy Office, Department of Homeland Security  
2707 Martin Luther King Jr. Avenue, SE  
Washington, D.C. 20528

**Privacy Risk:** There is a risk that an individual does not understand that submitting their information through the IMMVI Veterans Portal gives consent to DHS to share that information to the appropriate Component (e.g., ICE, USCIS, CBP) for review.

**Mitigation:** This risk is mitigated. The Privacy Act Statement and accompanying consent disclaimer on the portal, other IMMVI online materials and information, and this Privacy Impact

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<sup>17</sup> See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 Fed. Reg. 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.



Assessment all provide notice to individuals about how DHS will use information as part of the IMMVI process. The Privacy Act Statement specifically outlines that IMMVI may share the information provided to authorized U.S. government agencies for the purpose of ensuring that the service member can access and receive the benefits for which they may be entitled to or eligible. Further, the notice indicates that this process itself is not applying for relief or an immigration benefit through the appropriate agencies.

### 3. Principle of Purpose Specification

*Principle:* DHS should specifically articulate the authority which permits the collection of PII and specifically articulate the purpose or purposes for which the PII is intended to be used.

The information collected, used, and maintained through the IMMVI Veterans Portal is permitted in response to requirements listed in Executive Order 14012 and 8 U.S.C. § 1182(d)(5)(A). DHS is directed in the Executive Order to promote naturalization for military members and ensure access to the process. In response, on July 2, 2021, the Secretaries of DHS and the VA announced the IMMVI to identify and prioritize the return of current and former U.S. military service members and their immediate family members who were removed from the United States to ensure they receive any benefits to which they are entitled or eligible. The IMMVI Veterans Portal serves as a mechanism for these individuals who cannot access U.S. immigration benefits due to their prior removal from the United States to get assistance in resolving questions related to their immigration status.

### 4. Principle of Data Minimization

*Principle:* DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

IMMVI developed a multi-step process as outlined above that requires initial data collection directly from an individual to make a determination about that individual's eligibility for the IMMVI process. The IMMVI Veterans Portal collects the following information from submitters:

- Applicant Name;
- Applicant Mailing Address;
- Applicant Date of Birth;
- Applicant Phone Number;
- Applicant Email Address;
- Best Way to Contact: Email or Phone;



- A-Number;
- Country of Current Residence;
- USCIS Receipt Numbers for any pending applications for immigration benefits;
- Dates and Branch of Military Service;
- Legal Representative (if applicable);
- Legal Representative Name (if applicable);
- Legal Representative Company (if applicable);
- Legal Representative Contact Information (if applicable); and
- Brief Explanation of Request.

Once the information is initially submitted through the portal, a check is conducted through the Person Centric Query Service. IMMVI uses that information to populate the case record in the Salesforce platform in order to initially determine the individual's eligibility for this initiative. The data elements from the Person Centric Query Service check used to populate the case record include:

- Name;
- A-Number;
- Date of Birth;
- Contact Information (e.g., phone, email, mailing address);
- Country of Birth;
- Country of Citizenship;
- Class of Admission (if applicable);
- Permanent Residence Date (if applicable);
- Gender;
- Race;
- Marital Status;
- USCIS Receipt Numbers; and
- Parents' Names.



The Salesforce platform is also integrated with the Person Centric Query Service source systems being utilized for this initiative and may utilize data from these USCIS systems: Computer Linked Application Information Management System (CLAIMS 4), Computer Linked Application Information Management System (CLAIMS 3), Electronic Information System (ELIS), Central Index System (CIS), and RAILS. The System of Records Notices that cover these systems are: DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,<sup>18</sup> DHS/USCIS-007 Benefits Information System,<sup>19</sup> and DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records.<sup>20</sup> The Salesforce platform integration with these systems allows IMMVI analysts to view a snapshot of the individual's record within these source systems to better facilitate assisting the individual.

Additional information will be maintained as an individual's case progresses. IMMVI will track the status of a case (e.g., routed to appropriate agency, closed, adjudicated), as well as any communications with the individual.

**Privacy Risk:** There is a risk that IMMVI will maintain more information than is necessary, obtained from the Person Centric Query Service or through the snapshots of the source systems.

**Mitigation:** This risk is partially mitigated. Due to the variety in nature of potential submissions to the portal, IMMVI worked with the DHS Privacy Office to determine the necessary data required to fulfill its responsibilities. In order to properly validate individuals' eligibility for the IMMVI process, the IMMVI Veterans Portal was developed to use a limited number of identifiers (e.g., A-Number). Limited information is solicited to reduce the burden on the applicant but also to ensure that inaccurate data would not be collected by asking for information for which the individual may not readily have access (e.g., immigration records). The Person Centric Query Service check, population of the case record, and snapshot view into source systems allow DHS to use source system data, ensuring accuracy and providing all the necessary information so that IMMVI analysts may perform their duties. Although the IMMVI analyst may not necessarily need all the information or data elements available to them through the Salesforce platform for each case, the IMMVI process does not create new access to data for personnel. All IMMVI analysts already have access to this information as part of their normal job responsibilities.

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<sup>18</sup> See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 Fed. Reg. 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>19</sup> See DHS/USCIS-007 Benefits Information System, 84 Fed. Reg. 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

<sup>20</sup> See DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 Fed. Reg. 36950 (July 31, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.



**Privacy Risk:** There is a risk that IMMVI will maintain received information for longer than necessary.

**Mitigation:** This risk is not mitigated. IMMVI currently does not have an approved records retention schedule from the National Archives and Records Administration (NARA). However, the records will be maintained as “permanent” for at least two years. It is estimated that at that time a key objective of the initiative, identifying the number of current and former U.S. military members in need of services abroad, will be accomplished. The IMMVI team will coordinate with DHS Records Management and the National Archives and Records Administration to gain approval for a records retention schedule. Once the appropriate retention schedule is developed and finalized, the IMMVI team will ensure that the requirements are followed to include purging any information collected prior to the establishment of the retention schedule that exceeds the approved retention period.

## 5. Principle of Use Limitation

*Principle:* DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.

Information collected and maintained is only used for IMMVI purposes. These purposes are specifically outlined in the IMMVI Announcement, this Privacy Impact Assessment, the Privacy Act Statement that accompanies the portal, and other public-facing information about the initiative.

DHS takes great care of the data it collects and will only share information when necessary. Any information sharing is conducted to the appropriate DHS Component (e.g., ICE, USCIS, CBP) based on a need-to-know or to another federal agency (e.g., the VA) in accordance with the routine uses outlined in the Privacy Act Statement on the portal and as outlined above in this Privacy Impact Assessment and in accordance with the consent provided by the current and former U.S. military members by submitting their information. As an example, IMMVI uses the data it collects from the applicant or their representative to better direct them to the appropriate DHS Component or other federal agency for further assistance. When sharing information with another federal agency, such as the VA, DHS will obtain any necessary and appropriate consents, in addition to those already made through the IMMVI Veterans Portal, before sharing. Further, DHS will only share the necessary information needed for the external federal agency to fulfill its responsibilities; IMMVI does not share the entire case record or additional information available from the source systems.

**Privacy Risk:** There is a risk that information collected will be used inappropriately.

**Mitigation:** This risk is mitigated. This Privacy Impact Assessment, the IMMVI Announcement, the Privacy Act Statement that accompanies the portal, and other public-facing information about the initiative document the types of the information being collected and the



purposes for which it will be used. Only those individuals with a need-to-know will have access to this information. All personnel will be trained on how to use and share the information as necessary, in addition to receiving annual privacy and security awareness training that is required for all DHS personnel.

## 6. Principle of Data Quality and Integrity

*Principle:* DHS should, to the extent practical, ensure that PII is accurate, relevant, timely, and complete, within the context of each use of the PII.

One of the main goals of IMMVI is to identify the number of current and former U.S. military members who reside outside of the United States that are in need of service from DHS, the VA, or other federal agencies. Currently there is no system in place to capture this information in a cohesive and uniform manner. IMMVI will use the collected and available information to ensure the most accurate and up-to-date information is used to support these individuals who reside outside the United States.

As part of the IMMVI Veterans Portal workflow, when an individual submits their information, the information is checked against existing data in the Person Centric Query Service to confirm eligibility for the initiative. This process ensures that the IMMVI team is using the most accurate information to make a comprehensive analysis about the individual's eligibility for the initiative.

**Privacy Risk:** There is a risk that inaccurate information will be used during the evaluation.

**Mitigation:** This risk is mitigated. IMMVI has developed a two-step workflow to ensure that the most accurate information is used during this process. DHS collects information directly from the submitter through the IMMVI Veterans Portal. After a successful submission, an individual's information is automatically checked against the Person Centric Query Service. This permits DHS to use source system data, rather than information that has to be manually entered by an individual. If there are continued issues with data entry/accuracy or the IMMVI Veterans Portal, USCIS has a Salesforce helpdesk, available at <https://my.uscis.gov/account/v1/needhelp>.

Further, the purpose of the IMMVI is not to make adjudications, but to provide individuals with additional information about how to seek relief. All adjudicative decisions and determinations are still made by the appropriate DHS Component or other federal agency.



## 7. Principle of Security

*Principle:* DHS should protect PII (in all forms) through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

All the information DHS uses as part of this effort is maintained on the DHS network and all systems have been accredited in accordance with the requirements of DHS 4300A, Sensitive Systems Policy Directive.<sup>21</sup> DHS implements appropriate administrative and technical safeguards, such as privileged or administrator accounts that restrict access to authorized personnel with a valid need-to-know to perform official duties. The IMMVI instance on the Salesforce platform is made available only to those IMMVI personnel with a need-to-know. System administrators set user roles to ensure appropriate access and use.

DHS conducts regular audits of the Salesforce platform and its users and maintains audit logs of activity in the system, in accordance with DHS 4300A. These logs provide information on which records have been accessed, the date/time they were accessed, who accessed them, and whether any records were updated or modified.

**Privacy Risk:** There is a risk of improper access to IMMVI data.

**Mitigation:** This risk is mitigated. All of the systems and processes that the IMMVI team uses ensure that only those with a need-to-know will have access to the data. Only those individuals involved in identifying current and former U.S. military members in need of assistance and evaluating cases have access to the data through the provisioning of proper access controls. If there is any need to share any IMMVI related emails that contain personally identifiable information, they will be encrypted or password protected.

## 8. Principle of Accountability and Auditing

*Principle:* DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

All Salesforce platform users and those personnel that access the DHS network must complete annual privacy and security training to include signing and acknowledging Rules of Behavior, which outline appropriate uses of system data, uploading records, disclosure and dissemination of records, and system security. System users receive a notice reminding them that unauthorized or improper use or access may result in disciplinary action, as well as civil and criminal penalties.

The Salesforce platform technical safeguards (e.g., role-based access controls) ensure that only authorized users with a valid need-to-know have access to the information to accomplish their

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<sup>21</sup> See DEPARTMENT OF HOMELAND SECURITY, DHS SENSITIVE SYSTEMS POLICY DIRECTIVE 4300A (2017), available at <https://www.dhs.gov/privacy-policy-guidance>.



assigned tasks. The system accessibility and functionality restrictions are defined by user roles. Each user role has defined and limited access authority to view and edit data set by a master administrator. The user roles are determined on a need-to-know to perform official duties. The master administrators also monitor all account and user activity to the information system. The master administrators use automated tools to assist them in monitoring, analyzing, and reporting activities in the system.

## Responsible Official

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## Approval Signature

Original, signed version on file with the DHS Privacy Office.

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