



Privacy Impact Assessment

for the

National Appointment Scheduling System (NASS)

DHS Reference No. DHS/USCIS/PIA-057(b)

June 17, 2022



**Homeland
Security**



Abstract

The U.S. Citizenship and Immigration Services (USCIS) uses the National Appointment Scheduling System (NASS), a cloud-operated system, to schedule appointments for biometric collections at USCIS' Application Support Centers (ASC). The United Kingdom Visa and Immigration (UKVI) service website's interface with NASS was created to allow individuals seeking an immigration benefit with the UK and residing in the United States to schedule a biometrics collection appointment at an Application Support Center. This Privacy Impact Assessment (PIA) is being updated to account for the collection, use, maintenance, and dissemination of personally identifiable information (PII) from individuals who are seeking a UK immigration benefit and who schedule a biometric collection appointment through the NASS-UKVI website interface, the Appointment Scheduler.

Overview

USCIS offers a fee-based service to international partners to collect biometric and limited biographic information from individuals who are filing immigration-related benefit applications with partner countries and who are physically present in the United States. Section 573 of the Foreign Assistance Act of 1961 (FAA) authorizes U.S. agencies to furnish services to foreign countries, at the President's discretion, in furtherance of their anti-terrorism efforts. USCIS provides this service to certain partner countries for a fee agreed upon by each country and set forth in a Memorandum of Understanding (MOU).¹ In 2007, the Secretary of State for Foreign and Commonwealth Affairs of the United Kingdom of Great Britain and Northern Ireland and the Director of USCIS signed a Memorandum of Understanding allowing USCIS to capture biometric and limited biographic data on behalf of the UK Government to assist the UK with determinations whether applicants for entry to the UK are eligible to obtain visas or other travel documents according to applicable UK laws.

In furtherance of this agreement, the two immigration agencies developed an interface between the USCIS NASS, a USCIS appointment scheduling system for biometrics capture and immigration adjudication interviews, and the UK Visa Division's website. This integrated interface will allow individuals living in the United States who have applied for a UK immigration benefit to schedule a biometric collection appointment at a USCIS Application Support Center.

Reason for the PIA Update

USCIS is updating this Privacy Impact Assessment to document the development of an interface between NASS and the UKVI website, a project that will allow individuals living within

¹ Memorandum of Understanding between DHS and Secretary of State for Foreign and Commonwealth Affairs of the United Kingdom of Great Britain and Northern Ireland signed November 16, 2007.



the United States who applied for a UK immigration benefit, to schedule a biometric collection appointment with USCIS. The project is currently in development between the two agencies and is planned to launch in 2022.

The interface between the USCIS NASS and UKVI website will allow the UKVI applicants access through NASS to schedule appointments at USCIS Application Support Centers and Field Offices. The U.S. Department of Homeland Security (DHS), USCIS Immigration Records and Identity Services Directorate (IRIS) and the UK Foreign Ministry executed a Memorandum of Understanding wherein USCIS Application Support Centers will collect the biometrics data for UKVI applicants within the United States. Application Support Centers collect the appropriate biometrics, including face images on the UK's behalf, then transfer that data to the UKVI via a separate process using the Enterprise Gateway and Integration Services (EGIS).² Currently, there is a manual process for scheduling UK visa applicants to come to USCIS Application Support Centers. The UK Foreign Ministry requested the capability to automate this process, where applicants can obtain an appointment via its third-party vendor, the Visa Facilitation Services Global Group's (VFS) website. The UK Foreign Ministry contracted with VFS Global³ to process applicants in other countries on its behalf. NASS will provide scheduling services to VFS Global, which can only be done by providing VFS Global a NASS scheduling application programming interface (API).⁴ NASS will provide a customer experience which allows eligible UK visa applicants to navigate the entire process through the VFS Global website. This will preserve efficiency by mitigating the need for applicants to exit the VFS Global workflow to use myUSCIS⁵ or any other portal for scheduling their appointments at USCIS Application Support Centers.

² USCIS is migrating its information technology systems to the cloud environment to align with the Cloud Smart initiative. To support this modernization effort, USCIS plans to incrementally migrate Enterprise Service Bus 2 (ESB-2) hosted services to Enterprise Gateway and Integration Services (EGIS). See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE SERVICE BUS 2 (ESB 2), DHS/USCIS/PIA-008, and U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE GATEWAY AND INTEGRATION SERVICE (EGIS), DHS/USCIS/PIA-080, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³ VFS Global, also known as "Visa Facilitation Services Global," is an outsourcing and technology services company for governments and diplomatic missions worldwide. The company manages visa and passport issuance-related administrative and non-discretionary tasks for its client governments, see <https://www.vfsglobal.com/en/individuals/about.html>.

⁴ An application programming interface (API) is a connection between computers or between computer programs. It is a type of software interface, offering a service to other pieces of software.

⁵ myUSCIS is a public-facing web application that allows individuals to obtain accurate information about the general U.S. immigration process. myUSCIS is a service that helps online customers navigate through the immigration process. On myUSCIS, customers can find up-to-date information about the application process for immigration benefits, tools to help prepare for naturalization, and resources to find citizenship preparation classes and doctors in their local community. See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR myUSCIS, DHS/USCIS/PIA-064, and U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR myUSCIS ACCOUNT EXPERIENCE,



With the new interface, applicants can schedule an appointment by going to the UKVI website where they will be provided an Applicant Case Number.⁶ On the UKVI website, applicants will also be given directions to the USCIS NASS interfacing webpage where they will be asked to enter their Applicant Case Number. No other personally identifiable information will be collected. The applicant can also enter the state or zip code of a convenient location so that USCIS can then direct the individual to the closest Application Support Center. The applicant receives a confirmation notice from NASS that the applicant prints out. It includes the date, time, and location of the appointment and their Applicant Case Number. The Applicant Case Number collected at this point will not be tied to the personally identifiable information collected at the Application Support Centers. The purpose for collecting the Applicant Case Number online will be for scheduling the biometrics collection appointment. These numbers also will be used for reporting purposes so that USCIS can confirm to the UKVI the quantity of appointments that have been scheduled. The Applicant Case Number is not tied to the biometrics collected at the Application Support Center. If the individual needs to reschedule or cancel the appointment, they can go back to the same UKVI website, enter their Applicant Case Number, and reschedule or cancel their appointment. The Applicant Case Number will be stored for 120 days for reporting purposes after which it will be deleted from NASS.

Privacy Impact Analysis

Authorities and Other Requirements

Section 573 of the Foreign Assistance Act of 1961 provides the U.S. Government with the authority to conduct this fee-based service on behalf of partner countries in furtherance of their anti-terrorism efforts. This authority was delegated to USCIS by the U.S. Department of State.

To perform this service, USCIS will only collect the Applicant Case Number, an anonymized unique identifier assigned by the UKVI, through NASS Appointment Scheduler to schedule and reserve an appointment and will not link the Applicant Case Number to an individual's record in any UK or USCIS system. Since no personal data for these applicants is maintained by USCIS, USCIS cannot retrieve any personally identifiable information. Therefore, no System of Records Notice (SORN) is required to cover this collection because the data is not linked or linkable to an individual and is not retrievable by a unique identifier.

NASS was issued an authority to operate on April 10, 2014 and is part of the Ongoing Authorization (OA) program, for which the security posture is continuously monitored and tested. The NASS Security Plan was last updated February 11, 2021 and is in the process of being updated to include this Appointment Scheduler.

DHS/USCIS/PIA-071, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁶ See <https://www.gov.uk/government/publications/usa-apply-for-a-uk-visa/apply-for-a-uk-visa-in-the-usa>.



USCIS plans to retain the Applicant Case Number and associated scheduling data within NASS for 120 days for billing and reporting purposes. USCIS also retains audit logs of the transactions within NASS. NASS maintains these logs online for 180 days and then offsite for seven years. This is the standard retention period specified by DHS Security Authorization policy for system audit data; the National Archives and Records Administration General Records Schedule 30 [DAA-GRS2013-0006-0003] covers the retention of audit data.

USCIS also collects scheduling data on behalf of the UK. The limited information collected through Appointment Scheduler is not subject to the Paperwork Reduction Act.

Characterization of the Information

The NASS Appointment Scheduler collects the UK-issued Applicant Case Number, zip code, and appointment date and time directly from the individual to schedule an appointment at an Application Support Center. Appointment scheduling information is then transferred to and stored in NASS. At the scheduled appointment, USCIS collects biometric and limited biographic data from the individual and transmits the data to the UKVI as described in USCIS International Biometric Processing Services Privacy Impact Assessment.⁷

Privacy Risk: There is a risk of data inaccuracy.

Mitigation: This risk is partially mitigated. USCIS mitigates the risk of maintaining inaccurate data by collecting information directly from the individual and by verifying information at the time of the appointment. USCIS relies directly on the individual to provide accurate information. There are no mechanisms in place at the time of the appointment scheduling process to verify that the Applicant Case Number was issued to the individual by the UKVI. USCIS configured the Appointment Scheduler to accept a 12-digit alphanumeric number value as the Applicant Case Number.⁸ However, when an individual makes an Application Support Center appointment, the applicant is asked to bring their appointment confirmation receipt, UKVI-issued Biometrics Instruction Letter,⁹ and a government-issued travel document to verify the legitimacy of the biometric collection appointment. At the Application Support Center, the appointment in NASS is matched to the Applicant Case Number shown in the UKVI-issued Biometrics Instruction Letter.

⁷See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR CUSTOMER SCHEDULING AND SERVICES, DHS/USCIS/PIA-046 (2014 and subsequent updates), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

⁸ The Applicant Case Number will always have a prefix of GWF + 9 digits.

⁹ Individuals who have applied online or by mail for a UK immigration benefit and who are required to enroll biometrics receive a Biometrics Instruction Letter.



Uses of the Information

USCIS uses the Applicant Case Number and associated scheduling information to schedule and reserve a biometrics appointment at an Application Support Center, where biometrics are collected in support of an individual's UK immigration benefit request. The Applicant Case Number is used to identify the individual when he or she arrives for the appointment, as well as for reporting and billing purposes. The zip code or state is used to locate the Application Support Center closest to the individual scheduling the appointment.

Privacy Risk: There is a risk that the information collected may be used for purposes other than scheduling an appointment or for reporting purposes.

Mitigation: This risk is mitigated. USCIS does not use the information collected beyond reserving a biometric appointment timeslot and for reporting and billing purposes. USCIS collects the Applicant Case Number from the individual to schedule and reserve an appointment. This number is generated by the UK government and is not tied to any information in USCIS systems. Because USCIS does not retain this information for an extended period, it limits the risk that USCIS could use the data for any reason other than the stated purposes. This risk is also mitigated by the terms of the agreements with the UK, which limits USCIS' use of information to only appropriate purposes, as outlined in this Privacy Impact Assessment update.

Notice

USCIS is providing general notice about the NASS-UKVI appointment scheduling system enhancement through this Privacy Impact Assessment update. The UKVI provides notice to appear at an Application Support Center for biometrics collection and instruction about how to schedule an appointment in the UKVI's Biometrics Appointment Letter. USCIS provides a Privacy Notice to inform individuals of USCIS's authority to collect information on behalf of the UK as well as the purposes of the collection, routine uses of the information, and consequences of declining to provide the information to USCIS on behalf of the UK. There are no privacy risks associated with notice since both USCIS and the UKVI provide notice to individuals applying.

Data Retention by the Project

USCIS plans to retain the Applicant Case Number and associated scheduling data within NASS for 120 days for billing and reporting purposes. USCIS also retains audit logs of the transactions within NASS. NASS maintains these logs online for 180 days and then offsite for seven years. National Archives and Records Administration General Records Schedule 30 [DAA-GRS2013-0006-0003] covers the retention of audit data.

Information Sharing

USCIS provides a fee-based scheduling and biometric collection service to the UK. The UK is required to pay for the scheduling and biometric collection services. USCIS shares monthly



reports from NASS detailing scheduled appointments for biometrics collection services with the UKVI. The monthly reports contain no personally identifiable information and merely provide the Applicant Case Numbers, date, time, and Application Support Center location.

Privacy Risk: There is a risk of unauthorized disclosure.

Mitigation: This risk is mitigated. USCIS and the UK operate under a signed Memorandum of Understanding between the Secretary of State for Foreign and Commonwealth Affairs of the UK of Great Britain and Northern Ireland and the Director of USCIS. The Memorandum of Understanding outlines the limitations on dissemination and the steps needed for parties to appropriately disseminate information outside of USCIS, if applicable. In addition, all users that handle the data associated with this project must conform to appropriate security and privacy policies, follow established rules of behavior, and receive training regarding the security of DHS systems.

Redress

USCIS does not offer redress or data correction for individuals scheduling biometric appointments as part of the NASS appointment scheduling system enhancement. The UKVI is solely responsible for granting or denying applications and responding to any redress requests. The UKVI determines whether to change any of the information that was initially provided by the USCIS Application Support Center through its own redress processes, and whether the information provided in the redress request would have any impact on the UKVI's adjudication process. The appeals process for handling inaccurate or erroneous information is solely the responsibility of the UK and is available on the UKVI website.¹⁰ There are no privacy risks since the UKVI is responsible for providing redress to these individuals.

Auditing and Accountability

USCIS ensures that practices stated in this Privacy Impact Assessment comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. NASS is maintained in the Amazon Web Services, which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that USCIS uses to protect data in accordance with federal security guidelines. Amazon Web Services is Federal Risk and Authorization Management Program-approved and authorized to host personally identifiable information. The Federal Risk and Authorization Management Program is a U.S. Government-wide program that delivers a standardized approach to the security assessment, authorization, and continuous monitoring for cloud services.

¹⁰ See <https://www.gov.uk/government/publications/usa-apply-for-a-uk-visa/apply-for-a-uk-visa-in-the-usa>.



USCIS employs technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated during the security authorization process. These technical and security controls limit access to USCIS users and mitigate privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further, DHS security specifications also require auditing capabilities that log the activity of each user to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

Privacy Risk: There is a risk that the data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach because security controls may not meet system security levels required by DHS.

Mitigation: This risk is mitigated. USCIS is responsible for all personally identifiable information associated with NASS, whether on USCIS infrastructure or on a vendor's infrastructure, and USCIS therefore imposes strict requirements on vendors for safeguarding personally identifiable information. These requirements include adherence to the DHS 4300A Sensitive Systems Handbook,¹¹ which provides implementation criteria for the rigorous requirements mandated by the DHS Information Security Program.

Responsible Official

Angela Washington, Privacy Officer
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
(240) 721-3701

Approval Signature

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

Lynn Dupree Parker
Chief Privacy Officer
U.S. Department of Homeland Security
(202) 343-1717

¹¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, DHS 4300A SENSITIVE SYSTEMS HANDBOOK, available at <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>. DHS 4300A is a series of information security policies, which are the official documents that create and publish Departmental security standards in accordance with DHS Management Directive 140-01, *Information Technology System Security*.