



Privacy Impact Assessment

for the

USCIS ArcGIS Enterprise System

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**Homeland
Security**



Abstract

The U.S. Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) developed the USCIS ArcGIS¹ Enterprise System (AES), a Geographic Information System (GIS), which creates maps and geographic data to enable mapping as a common visual language promoting analysis and decision-making. The USCIS ArcGIS Enterprise System allows USCIS to efficiently analyze geographic data about where USCIS-related operations occur and their connections through high-level statistical aggregated reports. The ArcGIS Enterprise System is also used to geospatially display USCIS information via web-based maps to assist with decision-making across the agency and better serve its stakeholders. It will be used in operations to include evaluating office workloads, resource allocation, determining trends of potential fraud, locating current and potential USCIS assets, and identifying employees and facilities that may be at risk from natural disasters. This Privacy Impact Assessment (PIA) documents the potential privacy implications associated with the collection, use, and maintenance of personally identifiable information (PII) by the ArcGIS Enterprise System.

Overview

The USCIS ArcGIS Enterprise System operates as a minor application within the agency's Contact Relationship Interface System (CRIS)² security authorization boundary.³ The ArcGIS Enterprise System is the USCIS deployment of ESRI's ArcGIS software suite,⁴ including the ArcGIS Enterprise Portal, ArcGIS Pro, and ArcMap. USCIS has access to this software through a blanket purchase agreement (BPA) between ESRI and DHS. ESRI has no data access or control of the system because USCIS owns the data used, generated, and/or maintained. USCIS ArcGIS Enterprise System operates as a multimachine configuration pattern, meaning its highly decentralized design allows for office and programs to use the software to meet their mapping and visualization needs in a secure environment. The ArcGIS Enterprise System sources its data from the Enterprise Citizenship and Immigration Services Centralized Operational Repository

¹ "ArcGIS" is not an acronym.

² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CONTACT RELATIONSHIP INTERFACE SYSTEM (CRIS; formerly named Customer Relationship Management System), DHS/USCIS/PIA-019 (2008 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³ The ArcGIS Enterprise System server was transferred to the Contact Relationship Interface System security authorization boundary on July 13, 2023. The USCIS Office of the Chief Information Security Officer (CISO) determined that the ArcGIS Enterprise System aligned more appropriately with this major system boundary and the transfer was facilitated by the Information Security Division in the Office of Information Technology (OIT). The ArcGIS Enterprise System is not directly connected, via an application programming interface (API) or any other interconnection medium, to the Contact Relationship Interface System or any other major system.

⁴ ESRI is an international supplier of geographic information system software, web GIS, and geodatabase management applications. The company is headquartered in Redlands, California. The company was founded as the Environmental Systems Research Institute in 1969 as a land-use consulting firm. See <https://www.esri.com/en-us/about/about-esri/overview>.



(eCISCOR)⁵ data lake through manual upload and provides contextual tools for mapping and spatial reasoning, allowing USCIS to interactively map data and share location-based insights.

The data analysis that is then derived from the creation of maps, graphs, charts, or other visualization tools furthers USCIS administrative and procedural mission needs. With this portal solution, USCIS will eliminate the decentralization of the desktop software, which creates duplication of efforts, redundancies, and inefficient processing of mapping analyses. The USCIS ArcGIS Enterprise System allows source data to now be used to determine metric elements, like quantity of immigration benefits filing data for which analysts use historical filing data to identify areas where filings are increasing at rates above the average. These areas are mapped and compared to Field Office Directorate jurisdictions. The impacted field offices are then given increased resources for hiring and staffing to meet the increased number of filings in that area. Because ArcGIS is a geospatial mapping software, USCIS analysts can conceptualize the volume of applications and types of services being requested by applicants to better allocate resources at the field level. Data is transformed from tabular to visual using GIS functions like density and proximity, allowing for more human-readable analysis. This assists with determining when additional offices are needed and where. This data is manually pulled from any USCIS system holding the relevant data, as needed, on a case-by-case basis (i.e., case filings per zip code, field office directorate jurisdiction, and fraud cases within distance from attorney's office).

Mapping and geographic reasoning is also used to determine where to focus community outreach services. In addition, this portal helps to better project and forecast what future services may become needed as applicants transition through the immigration benefit application process. For example, based on historical immigration benefit request trends, an individual who files Form I-485, *Application to Register Permanent Residence or Adjust Status*, is very likely to submit Form N-400, *Application for Naturalization*, to USCIS in the future.

This software also allows staff to make quick determinations on asset management across all facilities, keeping track of what equipment is maintained and where it may be located within spaces. Office space reconfiguration is also a built-in function, which is used to maximize offices' needs. Finally, the ArcGIS Enterprise System allows all visualization projects created to be maintained in a portal that can be accessed by all authorized employees with a need to know, thus eliminating the existing method of placing the projects on unique Enterprise Collaboration Network (ECN)⁶ sites.

⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁶ USCIS uses SharePoint-as-a-Service (SharePoint), commonly referred to throughout the agency as the Enterprise Collaboration Network (ECN), a web browser-based collaboration and document management platform from



This Privacy Impact Assessment is intended to document USCIS' general use of the ArcGIS Enterprise System application. Program, system, and directorate-specific uses of the ArcGIS Enterprise System are outlined in the appendices to this Privacy Impact Assessment.

The following common use case studies illustrate the purpose of the ArcGIS Enterprise System:

Potential Use Case Study 1

The ArcGIS Enterprise System helps make workload adjustments by moving files and appointments to offices that are in proximity. This allows staff to manage their caseloads without causing undue burdens on applicants (i.e., using zip code analysis to move work between offices that are within a close geographic area, eliminating the need to require applicants to travel long distances for appointments). For example, a Field Office becomes aware that it will have a shortage in staffing in the coming months and receives an influx of form N-400 applications, appointment for which must be scheduled. That field office can use the ArcGIS Enterprise System and manually enter cases to be scheduled and relevant case information for planning purposes. This data⁷ is manually queried and pulled from the USCIS system that holds this information into ArcGIS. The ArcGIS Enterprise System will then create a geospatial map with the proximity of applicants to a field office location, as well as other field offices near the applicants' location. This will help leadership allot the number of cases that match their staff availability and allow them to identify how and where to distribute those cases for adjudication within a close enough range to not cause undue burden to the applicants.

Potential Use Case Study 2

In addition to workload adjustment, mapping and geographic planning is used to visualize where remote employees reside.⁸ The geographic location of an employees' residence is then used to track and create site inspection routes. For example, if a Service Center is in the process of planning home visits for remote employees, leadership would pull employee names, remote schedules, and remote addresses, along with any other needed information from the relevant USCIS systems and databases. They would then enter and plot this data using the ArcGIS Enterprise System. The ArcGIS Enterprise System would then create a map, showcasing

Microsoft. The USCIS ECN is a secure space for USCIS employees to create, manage, and share documents using customizable tools and services to eliminate additional investments in duplicative collaborative technologies. The USCIS ECN supports secure agency-wide collaboration and communication by connecting separate USCIS Program Offices and Directorates located in various geographic areas using a common platform.

⁷ In this situation, the data would be statistical in nature. The analyst is looking for the volume of applications from certain locations. However, other use cases may necessitate including personally identifiable information in the data pull. What personally identifiable information is used would vary based on use case and office mission and goals. See appendices to this Privacy Impact Assessment for more information.

⁸ When a USCIS employee submits Form G-1551 (Remote Work Request and Approval), they agree to sharing their personally identifiable information with USCIS, DHS personnel, and others with a need-to-know.

anonymized groupings of where employees are located, and help to make logistical determinations for site inspection routes.⁹

Access/User Types:

The USCIS ArcGIS Enterprise System intranet¹⁰ web portal will be accessible via a USCIS employee's or contractor's authorized DHS Personal Identity Verification (PIV)¹¹ card. Access to the system via PIV card is consistent with National Institute of Standards and Technology (NIST)¹² Special Publication 800-63 Digital Identity Guidelines¹³ assurance of the user's identity and authentication. When the user logs off, the session terminates, and the user no longer has access to maps, reports, or visualizations. ArcGIS Enterprise System includes role-based security, which permits a user to store workbooks, visualizations, reports, and dashboards to which they have access. All USCIS program offices and directorates (e.g., Field Office Directorate (FOD), Fraud Detection and National Security (FDNS), Refugee, Asylum, and International Organizations (RAIO), and others) will have access to the ArcGIS Enterprise System as needed; however, only a limited number of employees within each program office or directorate will have access to the tool. Access to the ArcGIS Enterprise System and ArcGIS Enterprise System reports will only be granted to USCIS users on a need-to-know basis with supervisory and ArcGIS team approval. User training is available via ESRI's online academy. Access to specific information will be restricted based on strict user group permissions.

The ArcGIS Enterprise System will include the following access user types:

- Viewer—Viewers can view items that are shared with them by other ArcGIS Enterprise System users. This user type is ideal for employees who need to view ArcGIS Enterprise System content in a secure environment. Viewers cannot create, edit, share, or perform analysis on items or data.

⁹ Based on the use case, ArcGIS creators can design maps that are either intended to live wholly within the software or that can be downloaded as static products.

¹⁰ An intranet is a private network contained within an organization that is used to securely share organization information and computing resources among employees. The USCIS intranet is only available to USCIS employees.

¹¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR PERSONAL IDENTITY VERIFICATION (PIV), DHS/ALL/PIA-014 (2006 and subsequent updates), *available at* <https://www.dhs.gov/privacy-documents-department-wide-programs>.

¹² The National Institute of Standards and Technology is a physical sciences laboratory and non-regulatory agency of the United States Department of Commerce. Its mission is to promote American innovation and industrial competitiveness.

¹³ These guidelines provide technical requirements for federal agencies implementing digital identity services and are not intended to constrain the development or use of standards outside of this purpose. The guidelines cover identity proofing and authentication of users (such as employees, contractors, or private individuals) interacting with government IT systems over open networks. They define technical requirements in each of the areas of identity proofing, registration, authenticators, management processes, authentication protocols, federation, and related assertions.



- **Creator**—Creators have all capabilities of the Viewer user type plus the ability to create content, administer the organization, and share content for use in Essential Applications, Field Applications, and Office Applications. The Creator user type is designed for those who need to create web maps and applications.
- **Portal Admin**—In addition to Creator capabilities the Portal Admin also has privileges to manage the organization and other users. Portal admins have full read/write rights over all data.

Storage and Retention:

Currently, data is manually imported into ArcGIS Enterprise System on an ad hoc basis, determined by the analytics needed in response to an operational need and on a case-by-case basis. The ArcGIS Enterprise System is currently hosted in Amazon Web Services (AWS). Data imported into the ArcGIS Enterprise System is maintained in accordance with established General Record Schedule 3.1 General Technology Management Records guidance: Temporary, destroy after five years; however, there are circumstances under which longer retention is authorized for legal or discovery purposes. System administrators will, at a minimum, annually review all content held and will manually scrub the portal of items for which it is determined there is no longer a business need. All data used, generated, and maintained by this system is owned by USCIS.

Dissemination:

The final visualization products created by USCIS employees in the ArcGIS Enterprise System are published to the ArcGIS Enterprise System portal or, optionally, exported to a Microsoft Excel, PowerPoint, or Adobe Portable Document Format (PDF) file. Only authorized users with a need-to-know may access visualization products via the intranet portal. The data visualization products may also be shared by a USCIS program office externally on a case-by-case basis. These use cases will be documented for transparency and accountability purposes in the appendices to this Privacy Impact Assessment. Also note, all information shared externally, if a lawful business need arises, will be deidentified, anonymized, and/or aggregated.

Section 1.0 Authorities and Other Requirements

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

The legal authority for the ArcGIS Enterprise System is derived from the Immigration and Nationality Act sections 101, 103;¹⁴ 5 U.S.C. §§ 301, 302; 5 U.S.C. § 3301;¹⁵ 5 U.S.C. § 6501 *et*

¹⁴ 8 U.S.C. § 1101, 1103 (2004) *et seq.*

¹⁵ 5 U.S.C. § 301, 302; 5 U.S.C. § 3301.



seq.;¹⁶ Telework Enhancement Act of 2010; 5 U.S.C. § 7106.¹⁷ Additional authorities will be documented in the appendices to this Privacy Impact Assessment based on the specific use case(s) for each USCIS program and office that implements this system.

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

System of Records Notice (SORN) coverage will vary by program, office, connected IT system's use or need of the ArcGIS Enterprise System and will be documented in the appendices to this Privacy Impact Assessment. The following System of Records Notices provide coverage for USCIS (i.e., FOD, FDNS, RAI0, OPQ, SCOPS) activities:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,¹⁸ covers the use of immigration records to facilitate administration of benefits and enforcement of provisions under the Immigration and Nationality Act and related immigration statutes.
- DHS/USCIS-006 Fraud Detection and National Security Records (FDNS),¹⁹ which covers the use of immigration records to fulfill the USCIS mission of enhancing both national security and the integrity of the legal immigration system by: (1) identifying threats to national security and public safety posed by those seeking immigration benefits; (2) detecting, pursuing, and deterring immigration benefit fraud; (3) identifying and removing systemic vulnerabilities in the process of the legal immigration system; and (4) acting as USCIS's primary conduit for information sharing and collaboration with other governmental agencies. FDNS also oversees a strategy to promote a balanced operation that distinguishes USCIS's administrative authority, responsibility, and jurisdiction from ICE's criminal investigative authority.
- DHS/USCIS-007 Benefits Information System (BIS),²⁰ covers the collection, maintenance, processing, and adjudication of naturalization, lawful permanent residence, and other immigrant and nonimmigrant immigration-related requests submitted to USCIS in accordance with U.S. immigration law. The Benefits Information System also covers the use of employee data in support of employee performance and production reporting purposes, and tracks an employee or contractor's workload and efficiency in processing a

¹⁶ 5 U.S.C. § 6501 *et seq.*

¹⁷ 5 U.S.C. § 7106.

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

¹⁹ See DHS/USCIS-006 Fraud Detection and National Security Records (FDNS), 77 FR 47411 (August 8, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁰ See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.



particular immigration request, managing workloads, and providing statistical analyses to USCIS leadership.

- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records,²¹ allows USCIS to collect and maintain records pertaining to asylum applications, credible fear and reasonable fear screening processes, and applications for benefits provided by law.
- DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records,²² covers the collection, uses, and maintenance of records on individuals seeking refugee status.

For USCIS employee and other records the following SORNs provide coverage:

- OPM/GOVT-1 General Personnel Records,²³ covers the use, collection, and storage of employee information for the purpose of mapping and tracking for workload adjustments (i.e., proposed telework inspection sites).
- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS),²⁴ covers employee access to the ArcGIS Enterprise System.
- DHS/ALL-010 Asset Management Records System of Records²⁵ covers the collection of information that assists with tracking equipment across facilities.
- DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records,²⁶ covers collection of remote and telework information.
- DHS/USCIS-007 Benefits Information System,²⁷ covers the use, collection, and maintenance of applicant, attorney, and interpreter information to map and track applicant proximity to field office locations and support workload adjustment to assist with the adjudication of cases.

²¹ See DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²² See DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, 81 FR 72075 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

²³ See OPM/GOVT-1 General Personnel Records, 80 FR 74815 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁴ See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁵ See DHS/ALL-010 Asset Management Records System of Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁶ See DHS/ALL-019 Payroll, Personnel, and Time and Attendance Records System of Records, 80 FR 58283 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁷ See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.



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

Yes. The ArcGIS Enterprise System's parent system, the Contact Relationship Interface System, operates under Ongoing Authorization (OA), which means that the system's security controls and organizational risks are assessed and analyzed at regular intervals (that vary by security control) to support risk-based security decisions. ArcGIS inherited the Authority to Operate (ATO) from its parent system on July 13, 2023.

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

ArcGIS Enterprise System follows the retention schedule of its data source which is eCISCOR. eCISCOR collects data from several other data sources and it follows the retention schedule of those data sources as specified in the eCISCOR Privacy Impact Assessment.²⁸ The ArcGIS Enterprise System will follow the shortest retention schedule indicated in the data source system's Privacy Impact Assessment. Data imported into the ArcGIS Enterprise System is maintained in accordance with General Record Schedule 3.1 General Technology Management Records guidance, which is temporary, and data is to be deleted when five years old. Longer retention is authorized if needed for business use. System administrators will, at a minimum, annually review all content held by ArcGIS and manually scrub the portal of items for which it is determined there is no longer a business need.

1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The ArcGIS Enterprise System uses information already collected and stored in the eCISCOR data warehouse; therefore, it is not subject to Paperwork Reduction Act (PRA).

²⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATION SERVICES CENTRALIZED OPERATIONAL REPOSITORY (eCISCOR), DHS/USCIS/PIA-023 (August 2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



Section 2.0 Characterization of the Information

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

USCIS Applicant Data

Applicant data is collected from various databases within the eCISCOR data warehouse depending on what insights the USCIS employee/contractor is researching and may include:

- Applicant information (such as names, dates, addresses, phone numbers, email addresses, country of birth and/or citizenship, date of birth, gender, immigration status, A-number, passport number, language(s) spoken, military service, naturalization cert and naturalization date, receipt number, A-File location, dates and times of processing, basis of claim, basis of request, basis of application, interviewing and supervisory officer assigned to case, filing date, grant date, referral date)
- Applicant family member information (such as names, dates, addresses, phone numbers, email addresses, country of birth and/or citizenship, date of birth, immigration status, passport number, language(s) spoken, military service, naturalization cert and naturalization date)
- Application preparer information (such as name, company, or relationship to applicant, contact information, date retained)
- Attorney information (such as name, firm, contact information, date retained)
- Case status information (such as pending, scheduling, interviewed, granted, referred)
- Contact information (such as phone number or email address)
- Detention and deportation information (may include address, zip codes, courts information)
- Foreign travel entry and exit information
- Historical information about applicants, petitioners, or beneficiaries as needed (may include medical, criminal, civil, immigration, military, educational or other life information)
- Home information (may include address and zip code)
- Interpreter name (such as name, company, or relationship to applicant, contact information, date retained)
- Interview information (date and time)



- Work information (may include addresses and zip code, contact information)

USCIS Jurisdictional Data

- Tables assigning ZIP codes to USCIS offices for case management purposes

USCIS Human Resources Data

- USCIS analysts have a need for human resources data to identify the proximity of USCIS employees and contractors to USCIS facilities or environmental hazards. The personally identifiable information data elements system users may use to develop maps in the ArcGIS Enterprise System may include employee name and home address. A more comprehensive list of relevant data elements will be delineated in the Appendix to this Privacy Impact Assessment.

Publicly available geospatial information

In addition to the data listed above, the ArcGIS Enterprise System collects a range of publicly available geospatial information such as administrative boundaries and infrastructure data to contribute to map products.

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

Although the USCIS ArcGIS Enterprise System is a minor application under the Contact Relationship Interface System authorization boundary, there is no direct connection to the information contained within that system or any other system or database. However, data from eCISCOR is manually uploaded into ArcGIS Enterprise System to use for mapping presentation. This application is used to optimize information derived from data USCIS already controls and does not require collection of information directly from individuals.

Category/Group	Data Type	Source	Update Frequency
Applicants, petitioners, and other related parties	Benefit and Citizenship Application Data	National Production Dataset	As Needed
USCIS Boundaries	Field Office Directorate Jurisdictional Boundaries (No PII)	National Appointment Scheduling System	Quarterly
USCIS Employee Data	Employee Names and Home Addresses	Human Resources Mart	As Needed
USCIS Facilities	Location of USCIS facilities including field	Contact Relationship Interface System	Quarterly



	offices, service centers, headquarters, etc.		
DHS Locations	Location of DHS component (CBP, ICE) facilities	DHS Matrix (Collibra Instance)	Quarterly
Disaster Information	Hurricane Tracking Forecasts	National Weather Service	As Needed
	California Wildfire Locations	CAL FIRE	As Needed
General References	Publicly available location information such as ZIP Codes, county boundaries, employment statistics, general housing prices (No PII)	ArcGIS Enterprise System Living Atlas	Varies

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

Yes, the ArcGIS Enterprise System ingests information from commercial data sources and publicly available data to supplement USCIS data and enable spatial displays. Examples of publicly available data used by the ArcGIS Enterprise System include administrative boundaries for zip codes, counties, and U.S. states; hurricane and wildfire data feeds provided by the National Oceanic and Atmospheric Administration (NOAA) and the California Department of Forestry and Fire Protection (CAL FIRE), respectively; public safety-related data from a range of sources; a variety of base maps available through ESRI to provide context and situational awareness to map products. Information is only ingested and never shared with ESRI. No personally identifiable information is obtained from commercial sources.

2.4 Discuss how accuracy of the data is ensured.

Most of the datasets available within the ArcGIS Enterprise System originate from an external (non-ArcGIS Enterprise System) data source, such as eCISCOR. Therefore, the ArcGIS Enterprise System relies on data quality and accuracy controls established by other components of USCIS or partner agencies to ensure the accuracy of source data. User Guides created by the internal ArcGIS Enterprise System Product Team have also been put in place to ensure that data



accuracy is maintained throughout the map product creation process.

In instances where aggregated data may not perfectly align with given boundaries (e.g., a county or zip code may be counted twice as it overlaps two administrative areas), that will be noted on the aggregated data's description or the final product.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: Because data is imported into the ArcGIS Enterprise System as a static file from USCIS databases, data within the ArcGIS Enterprise System may be outdated or inaccurate.

Mitigation: The risk is mitigated. Most of the information within ArcGIS Enterprise System is used to geospatially visualize existing USCIS data. It is not used to make real-time decisions. The time frame of the product is generally noted in the title or product description. For any products hosted within the ArcGIS Enterprise System, the system indicates the last time that a dataset was updated.

Discrepancies may be identified in the context of a USCIS analyst or employee's review of the data, and when discovered, the analyst or employee will take action to correct that information in the source system. Once the data is corrected in the source system, the updated information is uploaded into ArcGIS Enterprise System to ensure that the most current data is being used.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.

The ArcGIS Enterprise System is used to geospatially display USCIS information via web-based maps to assist with decision-making across the agency and better serve its applicants and petitioners. For example, the maps may be used to evaluate office workloads, identify potential cases of fraud, locate current and potential USCIS assets, and identify employees and facilities that may be at risk from natural disasters. Offices can also map publicly available data; use crime location data for risk analysis ahead of applicant home or site visits; and use employment and housing data to help determine resettlement locations for incoming asylum applicants.

Within the ArcGIS Enterprise System, users can access featured content, link to the ArcGIS Enterprise System Map Viewer application, view information on data sources, and receive help from the USCIS ArcGIS Enterprise System team. Within the "Gallery" section of the ArcGIS Enterprise System, users can browse featured maps, web mapping applications, and any new datasets available to the USCIS enterprise for which they have a need to know. Additionally, users can create a custom list of favorites. Using the "Map" function, users can build interactive web



maps and share them with others in their organization based on geographic area, mission, and need to know. Users can choose a base map, an area of interest, and add information layers. Once a user has finished building a map, they can refine it, save it to a personal workspace, or share it with other ArcGIS Enterprise System users with a need to know.

The ArcGIS Enterprise System also features “Groups” and “My Content.” “Groups” permits users to create a collection of items (maps or layers), usually related to a specific office. Group owners choose settings for whether the group is searchable, if others can request to join, and who can contribute content. “My Content” allows users to add and share web maps and applications files from their computer and content from the web.

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.

Yes. For example, a common application of the ArcGIS Enterprise System is for workforce modeling and hotspot analysis.²⁹ Analysts will conduct statistical analysis on historical N-400, *Application for Naturalization*, and I-485, *Application to Register Permanent Residence or Adjust Status*, application forms data to identify locations where the agency can anticipate increased applications and demand for benefits. This data is then displayed on a map in anonymized, aggregated form and feeds into decisions about allocation of manpower resources, or even opening new offices, to meet anticipated demand.

The facilities team uses the ArcGIS Enterprise System to identify new potential USCIS office locations. The team will overlay onto a map anonymized points for applicant addresses with anonymized USCIS employee locations and general infrastructure data, including highways and public transit routes. The map can then be used to narrow down potential sites for new USCIS offices that will be conveniently accessible to a wide number of applicants and employees.

A final common use case is employee protection from natural disaster threats. In the event of a natural disaster like a wildfire or hurricane, analysts can gather data about the location or predicted track of the disaster and compare it against both USCIS facility locations and employee home addresses. They can then determine who may be impacted by the disaster and need to evacuate and assess whether any changes need to be made to office status to protect employees.

3.3 Are there other components with assigned roles and

²⁹ Workforce modelling is the process of using historical data to identify trends and predict future demand for USCIS services, which then inform USCIS hiring decisions. Likewise, hotspot analysis identifies trends through spatial clusters of phenomena, such as large numbers of citizenship and benefits applications originating in specific metropolitan areas or counties. Identifying hotspots allows USCIS to better allocate resources to certain regions and offices to meet current and future demand.



responsibilities within the system?

No, only USCIS employees and contractors can access the ArcGIS Enterprise System. There are no other components with assigned roles or responsibilities within this USCIS system.

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

Privacy Risk: There is a risk that inferences about individuals' (USCIS personnel and customers) home and work locations may also reveal information about their socioeconomic status or family situation, and that such information could negatively affect decisions made on their job advancement prospects or granting of immigration benefits, respectively.

Mitigation: This risk is mitigated. USCIS employees and contractors are the only ArcGIS Enterprise System users and they are required to pass a background investigation before assuming their selected or appointed federal positions and granted access to the system. They must also complete annual USCIS and DHS personally identifiable information handling training including mandatory annual USCIS Privacy Awareness Training, Computer Security Awareness Training (CSAT), DHS Mandatory Records Management, and signed Rules of Behavior (RoB). Access to the ArcGIS Enterprise System is granted by the user's manager and by ArcGIS Enterprise System Program Management Office (PMO) based on the need to know. Access to any layers with personnel information is also limited through access and role management controls, which require supervisory approval. Audit logs are used to track all system activity, including user, date and time of action, and what action was performed. Upon entry to the ArcGIS Enterprise System, users are presented with a reminder/disclaimer and Privacy Act Statement) on the homepage of the ArcGIS Enterprise System portal regarding the type of data on the site. Finally, use of information to assess socioeconomic status or family situation is prohibited.

Privacy Risk: There is a risk that information within the USCIS ArcGIS Enterprise System may be used in a manner that is inconsistent with a USCIS user's specific mission area and authorities.

Mitigation: This risk is mitigated. The product creator is responsible for limiting access to all data and map products (USCIS program, office, or directorate) to specific groups within the ArcGIS Enterprise System to protect confidentiality of the data and/or data sets, as required. These groups may be based on USCIS offices, job functions, specific project teams, etc. Applying permissions to sensitive data and maps means that only users with a need-to-know will be able to access that information. For added security and accountability, user activity is also logged and audited by the respective user's program office supervisors and/or the ArcGIS Enterprise System Program Management Office for indicators of system misuse or inappropriate access.

ArcGIS Enterprise System specific products have usage disclaimers on how the product may be used. For example: "FOR INTERNAL USE ONLY. This map and application data should



only be used within USCIS. Distribution outside the agency is prohibited.”

All USCIS employees are required to take annual security training and abide by the Rules of Behavior (ROB) disclaimer.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The ArcGIS Enterprise System, and its parent system eCISCOR, do not provide specific prior notice of the collection of information because eCISCOR is not the original point of collection. eCISCOR replicates and stores data from several USCIS systems. Notice is provided through each source system’s respective System of Records Notice.

Additionally, the primary source of information for USCIS systems is the application filed by the applicant or on their behalf by a sponsoring individual or organization. USCIS applications contain a Privacy Act Statement and a provision by which an applicant authorizes USCIS to release any information received from the applicants as needed to determine their eligibility for immigration and naturalization benefits.

USCIS employees and contractors are provided with general notice of collection of this information and use through the onboarding process and through telework and other remote work agreements. Employees accepting a position in a federal agency are instructed on responsibilities associated with employment, including responsibilities related to maintaining accurate contact information and no expectation of privacy while using government furnished equipment (GFE) during normal business or working hours.

In addition, employees and benefit requestors are provided general notice through the publication of this Privacy Impact Assessment. USCIS provides general notice of its information collections from the public on all USCIS applications, requests, and petitions at the point of collection through Privacy Notices.

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

All information collected by source systems is provided by immigration benefit applicants and employees with notice provided. On benefit request forms and/or instructions, USCIS provides applicants seeking USCIS benefits with a Privacy Notice. The notice details the authorities, purpose, disclosure, and routine uses of information. USCIS notifies the applicant on the benefit



request form that they may decline to provide the requested information. However, failure to provide the requested information may delay a final decision or result in the denial of the applicant's benefit request. On each benefit request form, USCIS includes a statement that requests the applicant's signature to permit USCIS to release any information from the applicant's records necessary to determine eligibility for the requested benefit and where necessary for the administration and enforcement of U.S. immigration law.

USCIS employees and contractors are provided with general notice of performance management and other pertinent information collection through the onboarding process as well as through written remote work and telework standards and agreements. Employees accepting a position in a federal agency are instructed on responsibilities associated with employment, including responsibilities related to expectations of performance and regulations adherence.

In addition, employees and benefit requestors are provided general notice through the publication of this Privacy Impact Assessment. USCIS provides general notice of its information collections from the public on all USCIS applications, requests, and petitions at the point of collection through Privacy Notices. However, no direct notice is provided regarding the use of information for this purpose outside of this Privacy Impact Assessment.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk the ArcGIS Enterprise System may be used inappropriately to track the location of USCIS personnel or immigration benefit applicants without their awareness or consent.

Mitigation: This risk is mitigated. There is no live tracking on ArcGIS Enterprise System and any such live tracking is prohibited. Only static data files are used. USCIS does not have a license agreement or current business need for any of the live tracking tools offered by the vendor for the ArcGIS Enterprise System. Access to individual information in the ArcGIS Enterprise System is limited to only those with access permissions and a need-to-know.

Privacy Risk: There is a risk that ArcGIS Enterprise System users may collect, use, retain, and disseminate an individual's personally identifiable information without the individual's awareness or consent.

Mitigation: This risk is partially mitigated. All information collected by source systems is provided by immigration benefit applicants and employees, at which time notice is provided. On benefit request forms and/or instructions, USCIS provides applicants seeking USCIS benefits with a Privacy Notice. The notice details the authorities, purpose, disclosure, and routine uses of information. USCIS notifies the applicant on the benefit request form that they may decline to provide the requested information. USCIS personnel are provided with general notice of performance management and other pertinent information collection throughout the onboarding



process as well as through written remote and telework standards and agreements.

However, no direct notice is provided regarding the use of information for the purposes outlined in this Privacy Impact Assessment. This Privacy Impact Assessment may provide the only explicit notice to employees and benefit requestors that their information is maintained in the ArcGIS Enterprise System.

Section 5.0 Data Retention by the Project

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

Currently, data is manually imported into the ArcGIS Enterprise System on an ad hoc basis, determined by the analytics needed in response to an operational need, on a case-by-case basis. The ArcGIS Enterprise System is currently hosted in the AWS cloud infrastructure. Data imported into the ArcGIS Enterprise System is maintained in compliance with the established General Record Schedule 3.1 General Technology Management Records guidance: temporary, destroy when five years old, but longer retention is authorized if needed for business use. System administrators will, at a minimum, annually review all content held and will scrub the portal of items for which it is determined there is no longer a business need.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a possibility that USCIS will retain information for longer than necessary.

Mitigation: This risk is mitigated. USCIS adheres to the NARA-approved retention schedule for each source system's data. While eCISCOR maintains the data used by ArcGIS, eCISCOR retains data derived from all existing USCIS systems in accordance with data retention schedules specific to those systems. As records are deleted from the source systems, the records are then deleted from eCISCOR during the next refresh. The schedules proposed and approved by NARA for each source system meet Federal Records Act requirements and the stated purpose and mission of the system. USCIS and NARA carefully considered the source systems' NARA schedules to ensure that USCIS retains data for the minimum time needed to process the relevant application and make the information available for other USCIS benefits that an applicant might seek. After receiving information via eCISCOR from an original USCIS system data source, the ArcGIS Enterprise System will follow the shortest retention schedule provided in the data source system's Privacy Impact Assessment.

USCIS plans to develop a Standard Operating Procedure document for ArcGIS Enterprise System portal administrators which will require a yearly review of stored data. Anything outside the data source's retention schedule or five years (whichever comes first) would be deleted by the



administrators.

Section 6.0 Information Sharing

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

There are no external users of the ArcGIS Enterprise System, nor is information generated by the system shared externally by the system. ArcGIS as a system or mapping tool does not connect to other systems or share information outside of USCIS; nor does ArcGIS have external users with access to USCIS data.

However, as mentioned above, data visualization products may be shared by a USCIS program office on a case-by-case basis. These use cases will be documented for transparency and accountability purposes in the appendices to this Privacy Impact Assessment. Further, any information shared externally will be deidentified, anonymized, and/or aggregated.

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

There are no external users of the ArcGIS Enterprise System, nor is information generated by the system shared externally by the system. However, data visualization products produced by the system may be shared on a case-by-case basis. Any information shared externally will be deidentified, anonymized, and/or aggregated, as explained previously.

6.3 Does the project place limitations on re-dissemination?

USCIS does not maintain a record of disclosures from the ArcGIS Enterprise System pursuant to the Privacy Act because, while personally identifiable information may be used in the development or analysis of an ArcGIS map or visualization product, only anonymized or aggregated versions of the same may be disseminated. Re-dissemination limitation will be determined by the user office or program, as needed, and documented in the appendices to this Privacy Impact Assessment, as appropriate.

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

The ArcGIS Enterprise System does not share personally identifiable information outside of USCIS and it does not have external users. While personally identifiable information may be used in the development or analysis of an ArcGIS map or visualization product, only anonymized



or aggregated versions of the same may be disseminated. The office or program using the system will determine how best to maintain records of disclosures of deidentified visual products in accordance with applicable laws, regulations, and DHS privacy policies, and this information will be documented in the appendices to this Privacy Impact Assessment, as appropriate.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that a USCIS ArcGIS Enterprise System user may share information inappropriately with another agency or third party.

Mitigation: The risk is partially mitigated. The ArcGIS Enterprise System has access controls in place, including licenses and groups, that limit users' ability to access and download information without need to know. All ArcGIS Enterprise System users are USCIS employees or contractors and are therefore required to complete the annual data privacy training required by the agency. Finally, there are no external users on the ArcGIS Enterprise System. It would be possible, however, for a user to download the source data from the ArcGIS Enterprise System and share it as a static file with unauthorized third parties, but this is not a risk specific to the ArcGIS Enterprise System and is prohibited. ArcGIS Enterprise System maintains system logs so that such activities can be identified and audited should the need arise.

Privacy Risk: There is a potential risk of reidentification of subjects' personally identifiable information when ArcGIS Enterprise System aggregated data sets are shared with and/or combined with other agency or system's datasets.

Mitigation: The risk is partially mitigated. De-identifying personally identifiable information in ArcGIS maps, reports, and other analytical and visualization products is crucial for maintaining privacy. To this end, user offices use visualization products that have been properly deidentified through a single or combination of methods to include mostly aggregation (grouping data into larger units) and anonymization (remove or replace direct identifiers).³⁰

Further, regular audits by user office supervisors or management and the ArcGIS program team periodically ensure that deidentification methods remain effective, especially as new data is added. Lastly, user offices follow a retention plan that revisits data's usability and ensures data is destroyed when it no longer meets retention standards or is anonymized consistent with modern anonymization approaches if it continues to meet retention standards.

Also, the ArcGIS Enterprise System does not provide or receive personally identifiable

³⁰ Additional deidentification methods to include data masking (obscures specific data within a database, making the data anonymous but structurally similar to the original data), noise addition (introduces random variations to the data), generalization (replaces precise data with a range or category), data swapping (exchanges data values between records), suppression (removes distinctive data completely), geographic masking (adjusts location data slightly, ensuring specific locations cannot be identified), and the use of heat maps instead of pinpoint maps to reduce level of detail are also available.



information from other agencies. The data maintained in the USCIS ArcGIS Enterprise System is segregated from other agencies and third parties, which prevents layering with external datasets. The ArcGIS Enterprise System maps and reports are not shared with the public or external agencies because they are primarily used as a tool to assess internal efficiencies (workload and resources allocation), support problem solving (identifying potential benefits fraud trends and locating government furnished equipment), and support internal decision-making (emergency office closures and personnel notification due to manmade or natural disasters). This limited use and restricted sharing by USCIS program offices are described in the appendix section of this Privacy Impact Assessment.

Finally, USCIS users also must complete annual privacy and security training and abide by signed Rules of Behavior which inform users of the privacy risks involved with sharing personally identifiable information.

Section 7.0 Redress

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

All current USCIS employees and contractors are authorized to view their own individual human-resource related data at any time, in coordination with their supervisor or by logging into the respective Employee Production Reporting Tool system. The employee and contractor records generated, collected, maintained, used, and disseminated by USCIS for the management of performance records are covered by the Privacy Act. Current and former employees may request their information through either the Privacy Act or Freedom of Information Act (FOIA) process to access their personnel records.

Immigration benefit applicants must go through the redress mechanisms related to the systems in which their information is processed (i.e., those systems that ArcGIS Enterprise System accesses). Such access mechanisms are outlined in the appropriate USCIS source system Privacy Impact Assessments and System of Records Notices noted above.³¹

If an individual wants to file a Privacy Act or Freedom of Information Act request to view their USCIS records, the request can be mailed to the below address or submitted electronically at:

<https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act>.

National Records Center

³¹ USCIS Privacy Impact Assessment and System of Records Notices are available at <https://www.dhs.gov/uscispia-and-sorns> and <https://www.dhs.gov/system-records-notices-sorns>.



Freedom of Information Act/Privacy Act Program
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?

The USCIS ArcGIS Enterprise System does not employ any mechanisms that allow individuals to amend erroneous information. However, inaccurate information about individuals in the USCIS ArcGIS Enterprise System would not directly impact the individuals' benefit requests, for example, because the purpose of the system is to provide contextual tools for mapping and spatial reasoning, allowing USCIS employees to interactively map data and share location-based insights and metrics. As necessary, individuals can access and correct their information through redress procedures for individual source systems as described in the source systems' respective Privacy Impact Assessments and System of Records Notices.

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

Individuals are provided notice about the procedures for correcting information in Sections 7.1 and 7.2 of this Privacy Impact Assessment. USCIS also provides additional information to personnel on its USCIS Human Capital and Training intranet site and other internal information sites. Procedures for correcting benefit requester information are outlined in the appropriate USCIS Privacy Impact Assessments and System of Records Notices.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a privacy risk that USCIS may not afford an individual adequate opportunity to correct information that USCIS maintains in an ArcGIS Enterprise System generated data set.

Mitigation: This risk is mitigated. The ArcGIS Enterprise System relies on eCISCOR as its source for all USCIS data. Any incorrect data displayed or stored in the ArcGIS Enterprise System would be the result of incorrect data in the source system, and an individual who needs to correct information can follow the process for correcting it in the source system.³² That data will then be updated in the ArcGIS Enterprise System to reflect the changes.

³² USCIS Privacy Impact Assessment and System of Records Notices are available at <https://www.dhs.gov/uscispia-and-sorns> and <https://www.dhs.gov/system-records-notices-sorns>.



Section 8.0 Auditing and Accountability

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

USCIS ensures that the practices stated in this Privacy Impact Assessment are followed by providing privacy training, promulgating privacy policies and rules of behavior, auditing the system, and accountability for any misuse. USCIS established access and security controls to mitigate privacy risks associated with authorized and unauthorized uses, namely misuse and inappropriate dissemination of data. DHS security specifications require auditing capabilities that log the activity of each user to reduce the possibility of misuse and inappropriate dissemination of information. USCIS tracks all user actions via audit logs to identify audit 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.

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

All USCIS employees and contractors are required to complete annual privacy and security awareness training. These trainings address appropriate privacy concerns, including Privacy Act obligations, and examine appropriate technical, physical, personnel, and administrative controls to safeguard information.

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

USCIS deploys role-based access controls and enforces a separation of duties throughout the production of employee metrics. Access is limited to only those persons who have a need-to-know to perform their official duties. This need-to-know is determined by the job responsibilities of each employee. Employees are only granted access to their assigned production and case information. Supervisors can access their respective employees' production and case information for compliance and auditing purposes.

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?

The ArcGIS Enterprise System does not share information outside of USCIS. However, as mentioned above, data visualization products may be shared by a USCIS program office on a case-by-case basis. Any information shared externally will be deidentified, anonymized, and/or



aggregated. Moreover, USCIS has a formal review and approval process in place for new information sharing agreements. Any new use of information and/or new access or information sharing requests for USCIS systems must go through the USCIS change control process and be approved by the designated USCIS leadership prior to sharing information within and outside of DHS.

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 at the DHS Privacy Office

Mason C. Clutter
Chief Privacy Officer
U.S. Department of Homeland Security
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Appendix

(last updated October 12, 2023)

The following USCIS offices are planning to use or are using the ArcGIS Enterprise System in support of their operations and the USCIS mission. This appendix documents the purpose for each office's use of the system and privacy risks and mitigations, if any, associated with the use of personally identifiable information and the development of new datasets. Additional offices will be added and any additional potential privacy risks and mitigation measures discussed as future uses are identified.

Offices

USCIS Directorate/Office	Office Acronym	Appendix	Date
Fraud Detection and National Security	FDNS	A	July 13, 2023
Immigrant Investor Program Office	IPO	B	June 27, 2023
Immigration Records and Identity Services	IRIS	C	July 25, 2023
Office of Performance and Quality	OPQ	D	September 5, 2023
Office of Policy and Strategy	OP&S	E	July 20, 2023
Office of Security and Integrity	OSI	F	August 15, 2023
Refugee, Asylum, and International Operations	RAIO	G	July 26, 2023



APPENDIX A

Fraud Detection and National Security (FDNS)

Background:

The Fraud Detection and National Security Directorate's (FDNS) Intelligence Division (ID) is responsible for representing USCIS interests with the DHS Office of Intelligence and Analysis (I&A), the Department of Homeland Security (DHS) Operations Coordination and Planning, and other agencies within the law enforcement and intelligence community.³³ The Intelligence Division manages the analysis, reporting, production, and dissemination of USCIS immigration-based intelligence products in the field and at FDNS Headquarters. These products provide information on patterns, trends, and indicators of fraud or national security concerns. The Intelligence Division is also responsible for preparing specific intelligence reports addressing national security and/or public safety concerns involving immigrants and/or immigration processes, as well as for responding to internal and external requests for information (RFI) through the DHS Intelligence and Analysis Single Point of Service program.

The Current Intelligence Section within the Intelligence Division plans to use the ArcGIS Enterprise System to transform the current completed briefing tracking spreadsheet into a dashboard with embedded maps and infographics. The dashboard will be used to inform the Current Intelligence Section and FDNS leadership on metrics and provide visual orientation of the Current Intelligence Section work product. Use of the ArcGIS Enterprise System will improve visualization of the FDNS Current Intelligence Section work product for leadership consumption. This project will build from the existing Microsoft Excel Spreadsheet currently used for project tracking.

Purpose(s) for Use of the ArcGIS Enterprise System:

The information will depict the number of briefings delivered by the FDNS Current Intelligence Section to USCIS Refugee Officers who are deployed globally and their respective deployment locations. The information is based on USCIS staffing disposition and deployment requirements. The information will be stored in an ArcGIS data store or ArcGIS Enterprise Geodatabase. No new data will be generated; the only new data column will be generated from the transformation of the deployment city and country locations into latitudes and longitudes (geographic coordinates). The dashboard will be stored in perpetuity based on business need. The Current Intelligence Section may elect to use a form (application) called ArcGIS Survey 123, which will be embedded in the dashboard so that FDNS users can fill out the survey to add new

³³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE FRAUD DETECTION AND NATIONAL SECURITY (FDNS) DIRECTORATE, DHS/USCIS/PIA-013 (2014 and subsequent updates), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.



data such as the number of briefings, dates the briefings took place, on which countries, and how many employees attended the trainings.

Source of Information:

The employee personal information used in the creation of ArcGIS Enterprise System maps by the Current Intelligence Section is sourced from human resources-related data stored in the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR),³⁴ which is manually imported into ArcGIS on an ad hoc basis, determined by the analytics required in response to a FDNS operational need, on a case-by-case basis.³⁵

Category of Individuals Affected and Data Elements Used:

The following specific information about individuals is collected, maintained, used, and/or disseminated.

USCIS Employee/Contractor Information Only:

- Deployment city and country locations, which include latitudes and longitudes (geographic coordinates).

USCIS employee/contractor information only visible to the system administrators, and by author of a map:

- Username/User ID*

No data from the public is collected, used, or disseminated to create ArcGIS visualization products/maps.

Information Sharing:

FDNS will only share anonymized information generated through ArcGIS as appropriate.

System Access:

The only individuals who have access to the ArcGIS application are USCIS personnel within the Current Intelligence Section who have a need-to-know for the performance of their official duties and with supervisory approval. Access rights and privileges are monitored regularly, and individuals' access is revoked when they no longer need the information to perform their official duties. Some areas of ArcGIS portal have more restrictive permissions such that only

³⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³⁵ See DHS/USCIS-006 Fraud Detection and National Security Records (FDNS), 77 FR 47411 (August 8, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.



Current Intelligence Section team members working on a particular matter will have privileged access.

Applicable System of Records Notice(s):

- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS)³⁶
- OPM/GOVT-1 General Personnel Records³⁷

Retention Period:

Data imported into the ArcGIS Enterprise System is maintained in accordance with General Record Schedule 3.1 General Technology Management Records guidance: temporary and destroy when 5 years old, but longer retention is authorized if needed for business use. System administrators will, at a minimum, annually review all content held and will scrub the portal of items for which it is determined there is no longer a business need.

³⁶ See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792, November 27, 2012, available at <https://www.dhs.gov/system-records-notices-sorns>.

³⁷ See OPM/GOVT-1 General Personnel Records, 80 FR 74815 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.



APPENDIX B

Immigrant Investor Program Office (IPO)

Background:

The USCIS Immigrant Investor Program Office (IPO) administers the Employment-based Fifth Preference (EB-5) visa program. Congress established the EB-5 Program in 1990 to bring new investment capital into the country and to create new jobs for U.S. workers. The EB-5 Program is based on our nation's interest in promoting the immigration of people who invest their capital in new, restructured, or expanded businesses and projects in the United States and help create or preserve needed jobs for U.S. workers.

Purpose(s) for Use of the ArcGIS Enterprise System:

The Immigrant Investor Program Office uses the USCIS ArcGIS Portal to develop the Targeted Employment Area (TEA) Map, a tool designed to help Investor Program Office economists determine whether EB-5 projects fall within Targeted Employment Area areas. Specifically, the tool uses data from U.S. Census Bureau 5-Year American Community Survey estimates to designate whether geographical regions called Census Tracts are high-unemployment or rural. A Census Tract is rural if it is not in a town of 20,000 or more people and not in a metropolitan area and is a high unemployment tract if the unemployment rate of the tract or any of its adjacent neighbors is 150 percent or more than the national rate. If a tract is either high unemployment or rural, then it is a Targeted Employment Area .

IPO economists can use this tool to check the Targeted Employment Area designation of a project, based on the location, the project address, unemployment rate at the tract and national level, city population, and/or metropolitan designation. The economists can click on anywhere in the map, which is divided into Census Tracts and color-coded by designation, and a box with information pertaining to that location of the map will open.

Core Based Statistical Area (CBSA) and Census Tract Shapefiles are downloaded from the Census Bureau and loaded into a program called Spyder from the Anaconda Suite. Spyder is a data analysis program that uses the Python programming language. For this project, a Python program uses the Census shapefiles and 2020 Census Decennial data and performs geospatial analysis to determine whether Census Tracts overlap with cities and metropolitan areas to create a rural category. Next, the program uses the 5-Year American Community Survey data, calculates the unemployment rates for each tract, and combines this data with Census Tract shapefiles to determine high-unemployment areas. When the program is finished, it produces a Shapefile that is output to the Investor Program Office shared drive. The Shapefile is uploaded to the ArcGIS Portal, where it is loaded as a new "layer." The layer is set to public via the USCIS ArcGIS Portal administrator. "Public" means that only USCIS users can view the map within the ArcGIS system. Users cannot modify any of the information on the Investor Program Office site.



Source of Information:

Employment data from the published 5-Year American Community Survey (ACS) tables and population data from the 2020 Decennial Census are found on the U.S. Census Bureau's website.³⁸ This data helps determine the population of cities or towns. The Geography Mapping files, called Shapefiles, also are found on the U.S. Census Bureau website.³⁹ All data used in this project is free and can be downloaded from the Census.gov website by anyone with access to the internet.

Category of Individuals Affected and Data Elements Used:

The Investor Program Office does not directly collect or use personal data in the creation of its ArcGIS maps. Labor and employment estimates are downloaded from the public Census Bureau website, specifically the number of civilians in the labor force for every Census Tract. Also, the number of U.S. Citizens in every city and town is used to determine rural designation, which is included the 2020 Decennial Census. The unemployment rate is calculated and included in the final project for each Census Tract. All data available on the U.S. Census bureau's website has been de-identified using statistical methods such as data swapping and noise injection to disguise the original data in such a way that the results remain useful.

Information Sharing:

The USCIS Immigrant Investor Program Office will only share anonymized information as appropriate.

System Access:

The USCIS Immigrant Investor Program Office grants access to the ArcGIS Enterprise System on a limited basis to its employees with supervisor's approval, only for projects that further the mission of the office, and for which users have a need to know the information.

Applicable System of Records Notice(s):

- DHS/ALL-004, General Information Technology Access Account Records System (GITAARS)⁴⁰
- Commerce/Census-3, Special Censuses, Surveys, and Other Studies⁴¹

³⁸ See U.S. Census Bureau website available at <https://data.census.gov/>.

³⁹ See U.S. Census Bureau website available at <https://www.census.gov/programs-surveys/geography/geographies/mapping-files.html>.

⁴⁰ DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁴¹ COMMERCE/CENSUS-3, Special Censuses, Surveys, and Other Studies, 77 FR 18205 (March 27, 2012), available at [Privacy Act, Office of Privacy and Open Government, U.S. Department of Commerce \(doc.gov\)](https://www.dhs.gov/system-records-notices-sorns).



- Commerce/Census-5, Decennial Census Programs⁴²

Retention Period:

The information will be stored on the ArcGIS Portal until the system is no longer in use or is replaced. At minimum, the project will be updated on an annual basis with public data until the project is no longer in use. Relevant Census Bureau datasets are typically released between September and December every year; thus, new data will be added shortly after the release of new public Census data. Investor Program Office system administrators will review the data on an annual basis and purge any data that no longer has a business need.

⁴² COMMERCE/CENSUS-5, Decennial Census Programs, 81 FR 76557 (November 3, 2016), *available at* [Privacy Act, Office of Privacy and Open Government, U.S. Department of Commerce \(doc.gov\)](#)



APPENDIX C

Immigration Records and Identity Services (IRIS)

Background:

The USCIS Immigration Records and Identity Services Directorate's (IRIS) mission is to provide trusted, critical, and timely identity, immigration status, and employment authorization information to customers and stakeholders with a need to know the information. In support of its mission, IRIS is exploring the capabilities of the ArcGIS platform to identify potential uses to improve process efficiency and enhanced data insights through visualization.

Purpose(s) for Use of the ArcGIS Enterprise System:

IRIS may use employee duty location information (i.e., site or office addresses) in disaster response activities. For example, if there is a hurricane risk, IRIS can overlay potential hurricane tracks via ESRI public map layers⁴³ onto an IRIS duty location map layer to quickly identify potentially impacted employees and office locations. IRIS leadership can then create an action plan and aid personnel as needed, including permitting personnel leave, reducing workload and/or deploying additional resources (e.g., personnel, office equipment, and coordination with other USCIS offices).

The Identity and Information Management Division (IIMD), an IRIS subdivision, presents an additional use case: using immigration benefit applications total numbers to improve appointment scheduling and workload management for its Application Support Center (ASC). Application Support Centers provide biometric services appointments (fingerprints, photographs, and electronic signatures) for persons requesting an immigration benefit with USCIS. If the number of applications for a USCIS region increases, then the Identity and Information Management Division could visualize the potential impact and provide additional resources to the Application Support Centers in that region to prevent appointment delays, improve or maintain high standards of customer service, and support workload management decision-making.

These use cases are in the initial planning stages. As the use cases evolve and implementation plans are developed, USCIS will update this Privacy Impact Assessment appendix to reflect a more detailed analysis of what information may be collected and used, how ArcGIS will be used, and a privacy risk/mitigation analysis.

Source of Information:

IRIS employee duty location data will be sourced from the human resources-related data stored in the Enterprise Citizenship and Immigration Services Centralized Operational Repository

⁴³ See ESRI website available at <https://www.esri.com/en-us/disaster-response/disasters/hurricanes>.



(eCISCOR).⁴⁴ eCISCOR data is manually imported into ArcGIS on an ad hoc basis, determined by the analytics required in response to an IRIS operational need, on a case-by-case basis.⁴⁵

ESRI Hurricanes and Cyclones Public Information Maps⁴⁶ provide map layers, how-to-guides, and reports to help IRIS and other participating offices plan and manage their hurricane response.

Category of Individuals Affected and Data Elements Used:

IRIS does not collect or use personal data from the public in the creations of its ArcGIS visualization products. However, IRIS may use employee duty location information (i.e., site or office addresses) in disaster response activities.

Information Sharing:

IRIS will only share anonymized information as appropriate.

System Access:

USCIS IRIS grants access to the ArcGIS Enterprise System on a limited basis to employees with supervisor's approval, only for approved projects that further the mission of the office, and for which employees have a need to know the information.

Applicable System of Records Notice(s):

Covering the use of total numbers of immigration benefit applications received by service location:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System,⁴⁷
- DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records.⁴⁸

Covering the use of employee duty location information:

- DHS/ALL-004 General Information Technology Access Account Records System

⁴⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴⁵ See DHS/USCIS-006 Fraud Detection and National Security Records (FDNS), 77 FR 47411 (August 8, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁴⁶ See ESRI website available at <https://www.esri.com/en-us/disaster-response/disasters/hurricanes>.

⁴⁷ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁴⁸ See DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 FR 36950 (July 31, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.



(GITAARS),⁴⁹

- DHS/ALL-014 Department of Homeland Security Personnel Contact Information,⁵⁰
- OPM/GOVT-1 General Personnel Records.⁵¹

Retention Period:

The information will be stored on the ArcGIS Portal until there is no longer a business need for the visualization product (i.e., maps) and the system administrators in IRIS will review the data monthly and purge any data for which there is no longer a business need.

⁴⁹ DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁰ DHS/ALL-014 Department of Homeland Security Personnel Contact Information, 83 FR 11780 (March 16, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵¹ OPM/GOVT-1 General Personnel Records, 80 FR 74815 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.



APPENDIX D

Office of Performance and Quality (OPQ)

Background:

The Office of Performance and Quality (OPQ) provides data and operational analyses to senior decision makers and key stakeholders, to include Congress, the Department of Homeland Security (DHS), and other government agencies to promote a USCIS that is effective and efficient. OPQ includes the Chief of Staff (CoS), Workload Analysis and Research Modeling (WARM), Performance Analysis and External Reporting (PAER), and the Office of the Chief Data Officer (OCDO).

OPQ uses USCIS human resources and immigration data to create filing volume and staffing projections, assists in fraud detection and analysis, manages the USCIS Data Strategy, and facilitates data governance across the USCIS enterprise.

Purpose(s) for Use of the ArcGIS Enterprise System:

The Office of Performance and Quality uses the ArcGIS Enterprise System to develop maps and dashboards to help stakeholders, such as other USCIS offices and directorates, understand the location aspects of their data. OPQ supports USCIS business lines, including facilities management with office locations, security and integrity operations with storm and other emergency situations, human resources with employee locations, public engagement and fraud detection personnel with site visits, and field offices with filings. OPQ uses ArcGIS as a stand-alone tool and does not build on existing tools. Data is typically analyzed and computed to form new sets of statistical information like density, mean, median, and distribution.

Source of Information:

OPQ uses ArcGIS as a stand-alone tool and does not build on existing tools. PII is limited to employee home addresses while non-PII data includes data in the eCISCOR⁵² data lake. New data sets are created when location data is geocoded to be placed geospatially in anonymized or aggregated groupings.

Category of Individuals Affected and Data Elements Used:

OPQ does not directly collect or use personal information from the public in ArcGIS maps or other visualization products.

⁵² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



OPQ uses USCIS employee information such as employee names and home addresses (Zip code, City, State, Country) in analysis but not in final maps or reports, where data is anonymized or aggregated.

Information Sharing:

OPQ ArcGIS maps and other visualization products only display anonymous aggregated data, for internal consumption, and are not shared outside of DHS.

System Access:

OPQ grants access to ArcGIS on a limited basis to employees with a need-to-know, which is determined and access approved by the managers or leads involved in the specific project map or dashboard.

Applicable System of Records Notice(s):

Covering the potential use of USCIS employee information:

- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS),⁵³
- DHS/ALL-010-Asset Management Records System of Records,⁵⁴
- OPM/GOVT-1 - General Personnel Records.⁵⁵

Covering the potential use of information about immigration benefit applications:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,⁵⁶
- DHS/USCIS-007 Benefits Information System.⁵⁷

Retention Period:

The information will be stored on the ArcGIS Portal until the system is no longer in use or is replaced. System administrators in OPQ will review the data on an annual basis and purge any data no longer in use.

⁵³ DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁴ See DHS/ALL-010 Asset Management Records System of Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁵ See OPM/GOVT-1 General Personnel Records, 80 FR 74815 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁶ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁷ See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.



APPENDIX E

Office of Policy and Strategy (OP&S)

Background:

The Office of Policy and Strategy (OP&S) was created pursuant to the Homeland Security Act of 2002 to serve as the principal policy advisor to the USCIS Director and perform research and analysis on immigration issues and program evaluations. In addition, OP&S leads and moderates the Senior Policy Council, manages the USCIS Policy Manual, coordinates USCIS strategic goals and objectives, and oversees the regulatory development process to ensure compliance with the USCIS, DHS, and White House policy goals.

Purpose(s) for Use of the ArcGIS Enterprise System:

OP&S's purpose for utilizing the ArcGIS Enterprise System is part of a larger data analysis project, which mainly focuses on presentation of geographic information on a nationwide or world map. For example, OP&S uses ArcGIS to visualize from what country immigrants are coming from the most or the least, or which state resettles the greatest or least number of immigrants for a given timeframe.

OP&S also uses the ArcGIS Enterprise System to identify impacts of policy changes and visualize the impacts on maps. USCIS immigration data analysis is the main business or operational need in conjunction with use of ArcGIS software. For example, analysts source immigration benefit application data from various USCIS systems, including the Computer Linked Application Information Management System (CLAIMS3)⁵⁸ and Electronic Immigration System (ELIS2),⁵⁹ for analysis. After necessary benefit application data is retrieved, analysts only use application identification numbers (i.e., USCIS Receipt Number, A-Number, or Naturalization Certificate Number), date of birth (for age calculation), country of origin, and residential state in the United States. After necessary analysis is performed to meet the project-specific need, only anonymized aggregated information is presented on ArcGIS maps or other visualization products.

⁵⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM (CLAIMS3), DHS/USCIS/PIA-016 (2008 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁵⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ELECTRONIC IMMIGRATION SYSTEM (ELIS2), DHS/USCIS/PIA-056 (2018 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



OP&S analysts delete data retrieved from the USCIS databases when a data analysis project is completed. No other USCIS, DHS, or external data systems are used when analysts use ArcGIS software. OP&S analysts store newly created ArcGIS datasets in the SAS Predictive Modeling Environment (SAS PME)⁶⁰ server, USCIS network drives, and analysts' government furnished equipment (e.g., PCs), which are secured and protected by DHS data security tools and protection policies and practices. No analyst may store project-related data outside of the secured DHS/USCIS network drives or the USCIS SAS Predictive Modeling Environment server.

Source of Information:

OP&S uses immigration benefit application data stored in the Computer Linked Application Information Management System (CLAIMS3) and Electronic Immigration System (ELIS2), for analysis and creation of ArcGIS maps. OP&S analysts upload data manually into the ArcGIS Enterprise System on an ad hoc basis and for approved projects only.

Category of Individuals Affected and Data Elements Used:

OP&S may use the following data elements from the public/immigration benefit applications:

- Applicant information (such as names, dates, addresses, country of birth and/or citizenship, date of birth, gender, immigration status, A-File number, naturalization certificate and naturalization date, USCIS receipt number, A-File location, processing dates and times, basis of claim, basis of request, basis of application, interviewing, filing date, grant date)
- Applicant family member information (such as names, dates, addresses, country of birth and/or citizenship, date of birth, immigration status, language(s) spoken, naturalization cert and naturalization date)
- Application preparer information (such as name, company, or relationship to applicant, contact information, date retained)
- Attorney information (such as name, firm, contact information, date retained)
- Case status information (e.g., pending scheduling, interviewed, granted, referred, etc.)
- Immigrant entry and exit information

⁶⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE SAS PREDICTIVE MODELING ENVIRONMENT (SAS PME), DHS/USCIS/PIA-055 (2014), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



- Historical information about applicants or other individuals as needed (may include medical, criminal, civil, immigration, military, educational, or other life information)
- Interview and oath information (date and time)
- Work information (may include addresses and zip code, contact information)

Information Sharing:

OP&S only shares anonymized information as appropriate. OP&S ArcGIS maps and other visualization products only display anonymous aggregated data, for internal, USCIS consumption, and may not be shared outside of USCIS or DHS.

System Access:

OP&S grants access to ArcGIS on a limited basis to employees with a need-to-know, which is determined and access approved by the managers or leads involved in the specific project map or dashboard.

Applicable System of Records Notice(s):

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,⁶¹
- DHS/USCIS-007 Benefits Information System,⁶²
- DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records.⁶³

Retention Period:

Records are retained in compliance with General Record Schedule 3.1 General Technology Management Records guidance: designate data as temporary and destroy when five years old, but longer retention is authorized if needed for business use (i.e., legal, audit, or discovery holds).

⁶¹ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶² See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶³ See DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 FR 36950 (July 31, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.



APPENDIX F

Office of Security and Integrity (OSI)

Background:

The USCIS Office of Security and Integrity (OSI) provides leadership in the management of security and emergency operations within USCIS to protect employees, facilities, assets, and information to advance the USCIS mission by ensuring effective, efficient, and continual operations. OSI's Integrity Assurance Division (IAD) Risk Analysis Section plans to use the ArcGIS Enterprise System as a tool to present geospatial related data by producing informative map products intended to make current and relevant knowledge available to leadership on matters related to the protection of USCIS assets in support of the USCIS mission. The information presented and subsequent knowledge provided to leadership will provide a geographical synthesis of external public knowledge with USCIS's data to support informed discussion and decisions related to the safety and security of USCIS personnel and assets.

Purpose(s) for Use of the ArcGIS Enterprise System:

The USCIS Office of Security and Integrity (OSI) uses the ArcGIS Enterprise System to improve visualization of the Risk Analytic Section's work and to improve the analysis and presentation of information to decision-makers, such as USCIS leadership. The information presented and subsequent knowledge provided to leadership will provide a geographical synthesis of external public knowledge with USCIS's data to support informed discussion and decisions related to the safety and security of USCIS personnel and assets. For example, public data such as hurricane impact areas and air quality readings will be collected from publicly available sources and used in accordance with the providing entities stated use policies. The internal to USCIS data will include the already mapped layers of USCIS facility locations and Region, District, Field Office level catchment areas that are hosted on the agencies' ArcGIS instance. Additional information will be obtained from the agency's existing data sources including eCISCOR Databricks.⁶⁴ The only data element that will be used is aggregated counts of employees in potential impacted areas. This aggregation will be limited to employee counts by residential zip code as provided by USCIS Human Resources (Human Capital and Training (HCT)) through the HR Mart eCISCOR DataBricks. The information will be stored in the secure USCIS ArcGIS database. No new data will be generated; the only new data column will be generated from the

⁶⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



transformation of the city and country locations into latitudes and longitudes (geographic coordinates). The dashboard will be stored in perpetuity based on business need.

Source of Information:

This project will build from the existing USCIS eCISCOR Databricks data and publicly available geospatial data sets. These public datasets include but are not limited to those provided to the public by the National Oceanographic Atmospheric Administration (NOAA), National Hurricane Center, National Weather Service, National Wildfire Fire Center, OpenMaps, and ESRI World Atlas.

Category of Individuals Affected and Data Elements Used:

Data elements used include USCIS employee counts for a local area based on aggregated employee residence zip codes. Additional individual information related to facility or regional leadership contact information may be provided (e.g., contact information for facility safety officers).

Information Sharing:

OSI only shares anonymized information as appropriate. OSI ArcGIS maps and other visualization products only display anonymous aggregated data for internal consumption and are not routinely shared outside of DHS.

System Access:

OSI will grant access to a limited number of employees with a need to know, with supervisory approval, and working on approved projects that further the office's mission. Access to USCIS ArcGIS will be via user DHS/USCIS issued PIV cards. Access to the system via PIV card is consistent with NIST 800-63 assurance of the user's identity and authentication. When the user logs off, the session terminates, and the user no longer has access to maps, reports, or visualizations. ArcGIS includes role-based security, which permits a user to store workbooks, visualizations, reports, and dashboards to which they have access.

Applicable System of Records Notice(s):

- DHS/ALL-014 Department of Homeland Security Personnel Contact Information,⁶⁵
- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS),⁶⁶

⁶⁵ See DHS/ALL-014 Department of Homeland Security Personnel Contact Information, 83 FR 11780 (March 16, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶⁶ See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.



- OPM/GOVT-1 General Personnel Records.⁶⁷

Retention Period:

Data imported into ArcGIS Enterprise System by OSI is maintained pursuant to General Record Schedule 3.1 General Technology Management Records guidance, which designates data as temporary and to be destroyed when five years old, but longer retention is authorized if needed for business use. System administrators will, at a minimum, annually review all content held and will scrub the portal of items for which it is determined there is no longer a business need

⁶⁷ See OPM/GOVT-1 General Personnel Records, 80 FR 74815 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.



APPENDIX G

Refugee, Asylum, and International Operations (RAIO)

Background:

The Refugee, Asylum, and International Operations (RAIO) Directorate within USCIS is the office responsible for overseeing, planning, and implementing policies and activities related to asylum and refugee issues as well as immigration services overseas. The RAIO aims to secure America's promise by assuring in the overseas environment that the right benefit is provided to the correct applicant and offer protection to refugees, both in and outside the United States, in accordance with U.S. laws and international obligations.

RAIO has three divisions:

- The Refugee Affairs Division is responsible for providing the humanitarian benefit of refugee resettlement to applicants in need of protection throughout the world while diligently protecting the U.S. homeland through careful national security screening;
- The Asylum Division manages the U.S. affirmative asylum process, which permits individuals already in the United States or at a port of entry, who are not in immigration proceedings, to request asylum if they are unable or unwilling to return to their country of origin due to past persecution or a well-founded fear of future persecution; and
- The International Operations Division extends immigration benefits to eligible individuals and exercises vigilance in matters of fraud detection and national security, thereby supporting the USCIS mission of Securing America's Promise.

Purpose(s) for Use of the ArcGIS Enterprise System:

The Refugee, Asylum, and International Operations Directorate uses the ArcGIS Enterprise System for a variety of projects, most notably for analyzing the geographic patterns of asylum applicants to help with the distribution of resources or configuring jurisdictions. Patterns are often examined across time to determine changes in geography to assess where applicants are emerging, dissipating, or maintaining. The patterns are derived by aggregating data to asylum-specific locations (i.e., RAIO office, detention center, service locations) or place (i.e., city, metropolitan area, Census administrative unit, ZIP Codes). No Personally Identifiable Information (PII) is used for this ArcGIS project. When location data are not used, locations are anonymized or aggregated to geographic areas that make the specific locations of each applicant indistinguishable. When location data are used, locations are displayed at scales that make it



indiscernible regarding where an exact address is in reference to streets, buildings, or specific landmarks to provide anonymity.

In a separate project, applicants' distances from USCIS offices or service locations are analyzed. Most often applicant locations are used to measure the distances they will travel or they are grouped together by ZIP Code to determine in general how far a group will need to travel to receive services.

In other projects, location data are analyzed to determine if there are patterns of applications occurring in short periods of time and within proximity to each other. The purpose of these analyses is to determine the emergence of applicants settling within geographic areas and if resources are needed to serve them, as well as identify resources (i.e., attorneys, non-profits, support groups) that may be available.

At times, the data are used in analytical models to assess the relationship between the variation in applicant geography related to outcomes, such as adjudications. In these instances, the data are aggregated to groups either by applicant characteristics, office, or geography.

Data are not regularly posted to the ArcGIS Portal system. Only one project has used the ArcGIS Portal to display the aggregate counts of Operation Allies Welcome (OAW) locations by city and metropolitan areas. The purpose was to examine where resources would be allocated to help OAW applicants apply for asylum.

Source of Information:

The location data are extracted from Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR)⁶⁸ and GLOBAL (not an acronym).⁶⁹ GLOBAL, the Asylum Division's exclusive system of records, serves as the primary information technology case management platform for the administration of affirmative asylum, implementation of the Nicaraguan Adjustment and Central American Relief Act (NACARA) § 203, withholding of removal under the terms of a settlement agreement reached in a class action, and credible fear and reasonable fear cases. Global operates on the Amazon Web Services (AWS) cloud platform and combines the functionality of both mainframe systems into one application with a common interface. AWS is Federal Risk and Authorization Management Program (FedRAMP)-approved and authorized to host personally identifiable information (PII). FedRAMP is a U.S. Government-

⁶⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ENTERPRISE CITIZENSHIP AND IMMIGRATIONS SERVICES CENTRALIZED OPERATIONAL REPOSITORY (ECISCOR), DHS/USCIS/PIA-023 (2009 and subsequent updates), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

⁶⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ASYLUM DIVISION, DHS/USCIS/PIA-027(d) (2018), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.



wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring of cloud services.

Geographic data, such as FIPS (not an acronym) codes, may also be retrieved from the U.S. Census Bureau's official website. FIPS codes are used by the U.S. Census Bureau to identify legal and statistical entities for county subdivisions, places, and American Indian areas, Alaska Native areas, or Hawaiian homelands when the Census Bureau needs to present census data for these areas. A Census tract FIPS code is an 11-digit number that uniquely identifies each census tract in the United States. It is a string of the 2-digit state code, 3-digit county code, and the 6-digit tract code. The Census Bureau has published FIPS codes in census products for more than 30 years.

Category of Individuals Affected and Data Elements Used:

RAIO may use the following personal information from the public in the creation of ArcGIS maps. Note, however, location data are aggregated and grouped by geography, applicant characteristics (i.e., race, gender, age, nationality), or individual location data. When location data are not used, locations are analyzed and aggregated to geographic areas that make the specific locations of each applicant indistinguishable. When location data are used, locations are displayed at scales that make it indiscernible regarding where the exact address is in reference to streets, buildings, or specific landmarks to provide anonymity.

Other data elements retrieved and used in the aggregate:

- A-File numbers,
- Case ID numbers,
- Refugee/asylee applications numbers,
- Applicant characteristics (i.e., race, gender, age, nationality),
- U.S. ZIP Codes,
- Geographic regional locations,⁷⁰ and
- U.S. Census Bureau FIPS codes.⁷¹

Information Sharing:

⁷⁰ Regional geography is a branch of geography that studies the world's regions. A region itself is defined as a part of the Earth's surface with one or many similar characteristics that make it unique from other areas.

⁷¹ As noted above, FIPS codes are used by the U.S. Census Bureau to identify legal and statistical entities for county subdivisions, places, and American Indian areas, Alaska Native areas, or Hawaiian homelands when the Census Bureau needs to present census data for these areas. A Census tract FIPS code is an 11-digit number that uniquely identifies each census tract in the United States. It is a string of the 2-digit state code, 3-digit county code, and the 6-digit tract code. The Census Bureau has published FIPS codes in census products for more than 30 years.



RAIO only shares anonymized information as appropriate. RAIO ArcGIS maps and other visualization products only display anonymous, aggregated data for internal USCIS use and are not shared outside of DHS.

System Access:

RAIO grants access to the ArcGIS Enterprise System on a limited basis to employees with supervisor's approval, only for approved projects that further the office's mission, and only to those with a need to know.

Applicable System of Records Notice(s):

- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records,⁷²
- DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records,⁷³
- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,⁷⁴
- DHS/USCIS-007 Benefits Information System,⁷⁵
- DHS/ALL-004 General Information Technology Access Account Records System (*GITAARS*),⁷⁶ and
- Commerce/Census-5, Decennial Census Programs.⁷⁷

Retention Period:

All data downloaded from source systems are purged after projects have been finalized (i.e., deleted from employees' computers and shared drives). Data posted to the ArcGIS Portal are purged when the project is complete and/or the mapping application for which the data was created is no longer in use. ArcGIS administrators review maps in the ArcGIS Enterprise System portal yearly at a minimum. When data are posted to the ArcGIS portal, no location data are used

⁷² See DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷³ See DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, 81 FR 72075 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁴ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁵ See DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁶ DHS/ALL-004 General Information Technology Access Account Records System (*GITAARS*), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁷ COMMERCE/CENSUS-5, Decennial Census Programs, 81 FR 76557 (November 3, 2016), available at [Privacy Act, Office of Privacy and Open Government, U.S. Department of Commerce \(doc.gov\)](https://www.privacy.gov)



or visualized. No personally identifiable information (PII) is included with any location data, regardless of which option is used.