



Privacy Impact Assessment Update

for

RAILS

DHS Reference No. DHS/USCIS/PIA-075(a)

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**Homeland
Security**



Abstract

The U.S. Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) developed USCIS RAILS (not an acronym) to enable DHS and USCIS authorized personnel to request immigration files; electronically maintain an accurate file inventory; and track the location of paper and electronic immigration record content using a web-based system. RAILS allows DHS users to order, transfer, and receive official paper and electronic immigration records associated with an A-Number or receipt number. USCIS is updating the RAILS Privacy Impact Assessment to identify new uses of the system: Person Centrix Query Service (PCQS) and IMPACT (not an acronym), through Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), and the new connections to the following USCIS systems: Person Centric Identity Services (PCIS), USCIS Freedom of Information Act (FOIA) Immigration Records System (FIRST), and Content Management Services (CMS). This Privacy Impact Assessment Update also identifies the purpose, use, and sharing of information related to A-Files with external connections to the National Archives and Records Administration's (NARA) Archival Records Center Information System (ARCIS) and Iron Mountain's (IRM) Records Manager system.

Overview

The development of USCIS RAILS, previously identified as the National File Tracking System (NFTS), facilitates DHS' ability to efficiently manage and streamline access to millions of immigration files under its control. RAILS was designed with the objective of reducing the potential for misplaced and/or lost immigration files. It has simplified processes and enhanced user experiences. As previously identified, RAILS interfaces with the following systems to support global file tracking: Central Index System 2 (CIS 2);¹ Computer Linked Application Information Management System 3 (CLAIMS 3);² Global;³ USCIS Electronic Immigration System (USCIS ELIS);⁴ Immigrant Visa Content Service (IVCS);⁵ Enterprise Document Management System

¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM (CIS 2), DHS/USCIS/PIA-009 (2007 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM (CLAIMS 3), DHS/USCIS/PIA-016 (2008 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE ASYLUM DIVISION, DHS/USCIS/PIA-027 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE USCIS ELECTRONIC IMMIGRATION SYSTEM (USCIS ELIS), DHS/USCIS/PIA-056 (2018 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE INTEGRATED DIGITIZATION DOCUMENT MANAGEMENT PROGRAM (IDDMP), DHS/USCIS/PIA-003 (2007 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



(EDMS);⁶ and the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)⁷ through Identity, Credential, and Access Management (ICAM).⁸ RAILS also provides a world-wide tracking system for the USCIS National Records Center (NRC)⁹ with a centralized information system for tracking USCIS immigrant and receipt files. RAILS connects with these systems to share the location of A-Files (electronic and paper). . The primary purpose of RAILS is to support USCIS Records Division personnel in performing their duties to maintain and locate A-Files.

Reason for the PIA Update

USCIS is updating the RAILS Privacy Impact Assessment to document how it will use RAILS to manage, track, store, and process information related to immigration files and information transmitted using existing interfaces and the new electronic repositories and case management systems. Details regarding the new uses and interfaces are provided below for the following systems: Person Centric Identity Services (PCIS);¹⁰ Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR), which encompasses IMPACT and the Person Centrix Query Service (PCQS); Content Management Services (CMS); USCIS' FOIA Immigration Records System (FIRST); and external DHS connections to NARA's Archival Records Center Information System (ARCIS) and Iron Mountain's (IRM) Records Manager system.

Person Centric Identity Services (PCIS)

Person Centric Identity Services (PCIS) is an agency-wide effort to enhance business processes and use emerging technologies to ensure the reliability, accuracy, and completeness of biographic and biometric information across USCIS and other DHS immigration-related systems. The PCIS system compiles and aggregates this declared and obtained data using algorithms and other sophisticated tools to establish an identity profile. The identity profile presents a single data set of consistent information about an individual's identity history to support adjudicative

⁶ Recently, as part of the effort to modernize the Immigration Visa process, relevant A-Files were transitioned from the Electronic Document Management Service. The Electronic Document Management Service was decommissioned in 2023.

⁷ 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 (2009 and subsequent updates), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE PERSONAL IDENTITY VERIFICATION (PIV) MANAGEMENT SYSTEM, DHS/ALL/PIA-014 (2006 and subsequent updates), available at <https://www.dhs.gov/privacy-documents-department-wide-programs>.

⁹ [National Records Center \(dhs.gov\)](https://www.dhs.gov).

¹⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT FOR THE PERSON CENTRIC IDENTITY SERVICES (PCIS), DHS/USCIS/PIA-087 (2022), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



efficiency. To improve completeness and reliability, USCIS leverages existing IT systems and uses PCIS to enhance identity management across USCIS and other DHS components that rely on immigration records to accomplish their missions. RAILS will integrate with PCIS to associate all A-Files belonging to an individual to ensure the end users are informed of each file location within the DHS enterprise, to facilitate requests for all records related to the same person. In addition, PCIS will implement a PCIS file location service that will present the file location information with the PCIS user interface to other integrating systems. RAILS will only display, not store, biographical information (e.g., applicant's name, applicant's date of birth, applicant's country of birth) provided by PCIS.

RAILS receives and displays the applicant's biographical data through the interfaces with CIS 2 and PCIS. The biographical data displayed in real time in RAILS is not stored in RAILS; once the user logs off the query screen, the data is no longer available.

Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)

The RAILS database has a one-way connection with eCISCOR to track and manage the physical case files including A-File location information through the eCISCOR operational data store.¹¹ eCISCOR is a repository that consolidates information collected from other internal USCIS systems (e.g., Customer Relationship Interface System (CRIS)¹² and the Content Management Service (CMS), during the adjudication of requests for immigration benefits. . eCISCOR also monitors changes in RAILS and pulls those changes in real-time through a direct connection. New systems connections are identified below, and those systems are provided access to file location information through the eCISCOR data store.

- IMPACT¹³ (not an acronym) – A system designed to automatically identify risk factors to increase case processing efficiency by eliminating delays and reducing cycle times, will now receive location and status of immigration files (e.g., whether the file has been digitized, properly consolidated, and whether it's a multi-volume file) from RAILS.

¹¹ 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 (2009 and subsequent updates), *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

¹² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CUSTOMER RELATIONSHIP INTERFACE SYSTEM (CRIS), DHS/USCIS/PIA-019 (2008 and subsequent updates), *available at*, <https://dhs.gov/uscis-pias-and-sorns>.

¹³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE IMPACT, DHS/USCIS/PIA-074 (2018), *available at* <https://dhs.gov/uscis-pias-and-sorns>.



- Person Centrix Query System¹⁴ (PCQS) - Allows a user or system to submit a single query for all transactions involving an individual across 30 systems including DHS (RAILS), Department of State (DoS), and Department of Justice (DOJ) systems and returns a consolidated and correlated view of the individual's past interactions with the government agency as they pass through the U.S. immigration system. The Person Centrix Query System through eCISCOR will now receive file location and status information as well. The Person Centrix Query System also retrieves and temporarily displays information from other connected USCIS systems which includes RAILS.

Content Management Service (CMS)

Content Management Service (CMS)¹⁵ is a cloud-based platform used across USCIS to manage immigration-related content accessed and retrieved through a user interface called STACKS (not an acronym), or through separate USCIS interconnected systems.¹⁶ STACKS is a digital file viewing repository system for immigration records and is part of Content Management Service. STACKS is used by RAILS to obtain information associated with immigration records (e.g., A-Files, receipt numbers). The Content Management Service is accessed by USCIS personnel along with partner agencies, such as Immigration and Customs Enforcement (ICE), Customs and Border Protection (CBP), Department of State (DoS), and Department of Justice (DOJ). The Content Management Service supports document management, document imaging, records management, workflow, and document-centric collaboration. Recently, as part of the effort to modernize the Immigration Visa (IV) process, relevant A-Files were transitioned from the Electronic Document Management Service to Content Management Service. With this transition, users can search, retrieve, and view digitized A-Files and receipt files. USCIS scans the contents of an immigration-related file and electronically stores the digital images in this system. When a file is digitized, the Content Management Service sends real-time updates to RAILS for the location of the digitized file, which allows RAILS to notify users that the immigration file is electronically available in the Content Management Service. RAILS has a direct connection to the Content Management Service.

The Content Management Service is comprised of several core components internal to the system's operation which deliver notice of changes in CMS to RAILS related to immigration files. This ensures the systems can make updates based on the changes that took place in the Content

¹⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE PERSON CENTRIC QUERY SERVICE (PCQS), DHS/USCIS/PIA-010 (2016 and subsequent updates), available at <https://dhs.gov/uscis-pias-and-sorns>.

¹⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE CONTENT MANAGEMENT SERVICES (CMS), DHS/USCIS/CMS-079 (2019), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁶ Other systems include the following: myUSCIS (DHS/USCIS/PIA-071); 2) Enterprise Print Manager System (EPMS) (DHS/USCIS/PIA-063); 3) FOIA Immigration Records System (FIRST) (DHS/USCIS/PIA-077); available at <https://dhs.gov/uscis-pias-and-sorns>.



Management Service. These components are:

- **Content Repository** – Centralized repository of digital content, such as electronic documents, multimedia files (audio or video).
- **Content Application Program Interface (API)** – Supports system interconnection. The Content Management Service enables the application to create multiple versions of a document and maintain each version as part of an overall record. Multiple versions allow for a copy of each document to be placed with each record, thereby promoting awareness of changes.
- **Content Ingestion** – Facilitates system integration that supports content ingestion from external providers, such as NARA’s Archival Records Center Information System and Iron Mountain, a third-party provider of records management services.

This interface identifies actions that have taken place, such as the digitization of a record, or the addition of new content to an existing record. RAILS provides links directly to STACKS to enable DHS users to access the digital records.

Freedom of Information Act (FOIA) Immigration Records System (FIRST)¹⁷

FIRST is a public-facing portal that enables members of the public to submit FOIA and Privacy Act requests online and affords USCIS the opportunity to electronically deliver responsive records. FIRST also serves as an internal case management system for USCIS. FIRST queries RAILS for file location and requests files for transfer for FOIA processing.

National Archives and Records Administration’s (NARA) Archival Records Center Information System (ARCIS)

NARA’s records tracking system, the Archival Records Center Information System, is a web-based Information Technology (IT) system of the National Archive’s Federal Records Centers (FRC)¹⁸ that was developed to serve as an online portal through which an agency can conduct business with NARA’s Federal Records Centers. It allows agencies to handle all transactions online which reduces paperwork and enables the tracking of transactions to facilitate instant access to information related to an agency’s records. If RAILS requests files stored at NARA’s Federal Records Center, a request is submitted to NARA’s tracking system, Archival Records Center Information System, by a RAILS user with a user role “Request Role.”

. NARA employees monitor Archival Records Center Information System for new

¹⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR THE FOIA IMMIGRATION RECORDS SYSTEM (FIRST), DHS/USCIS/PIA-077 (2019), available at <https://www.dhs.gov/uscis-pias-and-sorns>.

¹⁸ For additional information, see <https://www.archives.gov/frc/arcis/about#what>.



requests, extract the requested files from their archives, and electronically¹⁹ send the files to the USCIS National Records Center.

The RAILS application that interfaces with NARA's Archival Records Center Information System (ARCIS) in real-time uses a Simple Object Access Protocol (SOAP) Web service interface that NARA provides. NARA has developed an Application Program Interface (API) which RAILS will access to establish a new Reference Request in ARCIS. The API provides a set of services that RAILS can call to establish and check the status of a Reference Request. The service calls are encrypted in transit using HTTPS. RAILS transmits data related to A-Files along with accession and box numbers that are retired and held at NARA. If files stored at NARA locations are needed by DHS, a request must be submitted using RAILS to NARA's record tracking system Archives and Records Centers Information System (ARCIS).

The automated process through ARCIS expedites the movement of immigration records by processing requests in real time. NARA employees monitor ARCIS for new requests, extract the requested files from their archives, and send the files to the National Records Center (NRC). The data elements contained in the file request from RAILS are:

- Agency Code;
- Agency System;
- User Identification (ID);
- Record Group (based on federal agency submitting the records);
- Contact Last and First Name;
- Contact Email Address;
- Request Category;
- Nature of Service;
- Service Level;
- Records Transfer Number (designation for the accession identifier for the retired file);
- Whole Container (container type and container description);
- Case File Information;

¹⁹ RAILS system has personalized user-based approval roles and permissions assigned through MyAccess developed and maintained through Identify, Credential, and Access Management. It manages users' access to USCIS applications and automates workflow and account provisioning.



- Recipient Name;
- Address Line 1;
- Address Line 2;
- Recipient City, State, Country, Zip Code;
- Recipient Email;
- Shipping Method;
- Shipping Account Number; and
- Comments.

Iron Mountain (IRM)

Iron Mountain is a third-party provider contracted by USCIS to provide records management services. Previously, USCIS employed a manual process to retrieve immigration files stored by Iron Mountain; however, to improve the process, an automated ordering process was implemented between RAILS and Iron Mountain's SafeKeeper Plus tool.²⁰ This replaced the USCIS Pull Ticket Label²¹ with an Iron Mountain SafeKeeper Plus File Retrieval Label. RAILS is now integrated with Iron Mountain's record management systems to automate the delivery of pull ticket requests to create orders. The record management API supports the creation/updating of inventory metadata, creation of order requests, and order updates, as well as other administrative functions. When users request files from Iron Mountain Responsible Party Codes (RPCs), RAILS aggregates the requests every morning/evening and invokes their API to transmit all requested files. This is a one-way communication from USCIS to Iron Mountain.

Privacy Impact Analysis

Authorities and Other Requirements

USCIS collects and uses information pursuant to the Immigration and Nationality Act (INA). Specifically, the Immigration and Nationality Act, 8 United States Code (U.S.C.) §§ 1101,²² 1103,²³ 1304 et seq.,²⁴ and 1360²⁵ and the implementing regulations found in Title 8 of

²⁰ SafeKeeper Plus is Iron Mountain's system that supports USCIS Records Management business. It facilitates order, inventory management, operational, and billing processes. It is the same system in which USCIS orders are placed and managed manually today.

²¹ Pull Ticket Labels are a RAILS-generated list of paper immigration files that have been requested to be sent to another Field Control Office or a storage location.

²² See 8 USC 1101: [Definitions \(house.gov\)](https://www.house.gov/legislation/usc/usc1101.htm).

²³ See 8 USC 1103: [Powers and duties of the Secretary, the Under Secretary, and the Attorney General \(house.gov\)](https://www.house.gov/legislation/usc/usc1103.htm).

²⁴ See 8 USC 1304: [Forms for registration and fingerprinting \(house.gov\)](https://www.house.gov/legislation/usc/usc1304.htm).

²⁵ See 8 USC 1360: [Establishment of central file; information from other departments and agencies \(house.gov\)](https://www.house.gov/legislation/usc/usc1360.htm).



the Code of Federal Regulations (8 CFR) authorize the collection of the information maintained in RAILS.

The information collected, used, and maintained in the RAILS system is covered under DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,²⁶ which accounts for documentation and maintenance of an individual's immigration application, petitions, and requests as they pass through the U.S. immigration process.

RAILS has been granted an Authority to Operate and was accepted into the USCIS Ongoing Authorization program. Ongoing Authorization requires RAILS to be reviewed monthly to sustain its security and privacy posture and maintain its Authority to Operate.

RAILS is not subject to the Paperwork Reduction Act requirements. RAILS only collects information directly from DHS federal employees requesting A-Files and is therefore exempt from the Act.

Characterization of the Information

RAILS continues to collect and maintain immigrant tracking numbers, such as A-Numbers, Naturalization Certificate Numbers (C-Numbers), receipt numbers, Victims of Human Trafficking Numbers (T-Numbers), and Work Numbers. USCIS system interconnections enable RAILS to obtain information pertaining to an applicant, system user, and immigration file.

RAILS receives and displays the applicant's biographical data through the interface with Central Index System 2 (CIS2). The biographical data is not stored in the RAILS database; RAILS only displays data stored in Central Index System 2 in real-time. When the user navigates away from the query screen, the data is no longer available.

Information collected and maintained on DHS employees and contractors via Identity, Credential, and Access Management includes the user IDs, last and first names, titles, email addresses, and business phone numbers.

Privacy Risk: There is a risk that users may update RAILS with incorrect location information regarding Field Control Offices and Responsibility Party Codes.

Mitigation: This risk is partially mitigated. The auditing procedures in place help to ensure the accuracy of the file locations. In addition, RAILS allows users to make edits to the file location directly in RAILS. Therefore, if a user has mistakenly entered an incorrect location, that location could then be edited and changed to the correct location.

²⁶ 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>.



Uses of the Information

RAILS is the primary system for providing immigration file location information for DHS and continues to support DHS' need to track files at the local, national, and the international levels. RAILS is designed to provide efficient access to immigrant information by maintaining an accurate file inventory. RAILS allows DHS to track current locations of immigration files managed by USCIS. This includes the archiving of files transferred to Field Control Offices for consolidation and files audited in a specific location. RAILS provides extensive reporting capabilities to track the files and an online historical query function.

RAILS continues to maintain, use, and share information pertaining to immigration file and system users identified in the previously published RAILS Privacy Impact Assessment. See the Privacy Impact Assessment appendices for more information on interconnections with other DHS systems.

The privacy risks and mitigation measures for those risks related to the use of the information by RAILS have not changed due to this Privacy Impact Assessment update.

Notice

RAILS does not collect information directly from individuals. USCIS provides general notice to individuals through the Alien File, Index, and National File Tracking System's System of Records Notice (SORN),²⁷ the associated source system SORNs (please see Appendices for a listing of the source systems), and this Privacy Impact Assessment update. Furthermore, the instructions associated with each benefit request form contain a Privacy Notice. Each Privacy Notice provides notice to individuals about USCIS' authority to collect information, the purposes of data collection, routine uses of the information, and the consequences of declining to provide the requested information to USCIS. Additionally, the forms also contain a provision by which an applicant authorizes USCIS to release any information received from the benefit requestor or beneficiary as needed to determine eligibility for benefits.

Data Retention by the Project

RAILS maintains, and tracks only immigration file locations. Digitized A-Files are maintained and stored in the Content Management System. The approved A-File data retention schedule for the collection of data contained within the A-File is in NARA Job Number N1-566-08-11. In accordance with this schedule, A-File (paper and electronic) information, which includes the consolidation of all pre-existing (temporary) files, is consolidated into the an individual's A-File and retained for 100 years from the date of birth of the subject of the record.

²⁷ 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>.



Information Sharing

This Privacy Impact Assessment update identifies the external sharing of information with NARA's Archival Records Center Information System via an Interconnection Security Agreement (ISA) and with Iron Mountain via a Service Level Agreement.

Iron Mountain is a third-party provider contracted by USCIS for records management services. Previously, USCIS used a manual process to retrieve immigration files from Iron Mountain. To enhance efficiency, an automated ordering process was implemented between RAILS and Iron Mountain's SafeKeeper Plus tool. This process replaces the USCIS Pull Ticket Label with an Iron Mountain SafeKeeper Plus File Retrieval Label. RAILS now integrates with Iron Mountain's record management systems to automate the delivery of pull ticket requests and creates orders. The record management API supports inventory metadata creation/updating, order request creation, order updates, and other administrative functions. When users request files from Iron Mountain Responsible Codes (RPC), RAILS aggregates the requests daily and transmits them to Iron Mountain through an API. This communication is one-way from USCIS to Iron Mountain; Iron Mountain does not invoke any RAILS API.

Privacy Risk: There is a risk associated with the automation process between Iron Mountain and RAILS.

Mitigation: This risk is mitigated. There is no additional information shared by RAILS with Iron Mountain. The streamlining of the process from manual to electronic changed the manual pull ticket process from a paper process to an electronic process. Rather than printing paper labels, the information is transmitted electronically via an encrypted connection. Iron Mountain does not have access to RAILS, and RAILS only provides Iron Mountain with the information needed. This is a one-way connection initiated by RAILS.

Redress

An individual may seek access to their USCIS records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Account holders not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law. FOIA requests may be mailed to the below address or filed electronically at <https://www.uscis.gov/records/request-records-through-the-freedom-of-information-act-or-privacy-act>:

National Records Center
Freedom of Information Act (FOIA)/Privacy Act Program
P. O. Box 648010
Lee's Summit, MO 64064-8010



Some information requested may be exempt from disclosure under the Privacy Act or FOIA. Additional information about Privacy Act and FOIA requests for USCIS records is available at <http://www.uscis.gov>.

Auditing and Accountability

USCIS ensures that practices stated in this Privacy Impact Assessment update comply with internal USCIS policies, including USCIS privacy policies, standard operating procedures (SOP), orientation and training, Rules of Behavior, and auditing and accountability procedures. RAILS is maintained in the Amazon Web Services (AWS), which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with federal security guidelines.²⁸ Amazon Web Services is FedRAMP-approved and authorized to host personally identifiable information.²⁹ FedRAMP is a U.S. government-wide program that delivers a standard approach to security assessment, authorization, and continuous monitoring for cloud services.

To maintain the accuracy of the data, USCIS conducts audits of the physical location of files to validate the information in RAILS. USCIS policy requires at least one audit per year for each Field Control Office (FCO). Most offices conduct rolling audits throughout the year. However, the National Records Center is required to be audited every five years.

File discrepancies, if any, are displayed on the RAILS dashboard. File location discrepancies identified are reconciled to the correct file location by USCIS records users. Updates are reviewed by the Field Control Office contact in RAILS. The Records Manager reviews the list of files that are potentially missing through the Records Manager Dashboard. If after 14 days the file location remains unreconciled, a flag is initiated within RAILS to identify the file as potentially missing. That information is forwarded to the Records Manager and Supervisor for the applicable Responsible Party Codes, who updates the file audited and identified as potentially missing

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²⁸ Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.

²⁹ See <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.



Approval Signature

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Appendix A: USCIS System Interconnections

- **Central Index System 2 (CIS 2)**³⁰ serves as a DHS-wide index system to track the location of case files, including A-Files and to maintain noncitizen status and information. CIS 2 contains information on the status of individuals, including lawful permanent residents, naturalized citizens, U.S. border crossers, apprehended noncitizens, noncitizens who have been issued employment authorizations, and other individuals of immigration interest to DHS. RAILS provides CIS 2 with a mechanism for performing file requests and file location searches. Each transaction processing a file movement into or out of an office or Federal Records Center (FRC), operated by NARA, is reported to CIS 2 through the RAILS and CIS 2 interface. There are several transaction types: transfer in, transfer out, transfer forward, file retirement, file accession change, and Federal Records Center return. The interface with CIS 2 provides RAILS with biographical data. If the RAILS user is also a CIS 2 user, then RAILS retrieves the name, date of birth, and country of birth for a specific A-File. The data is exchanged between the two systems through an encrypted connection. RAILS has a direct connection to CIS 2.
- **Global** (not an acronym)³¹ is a case management system that supports the screening of individuals in the credible fear, reasonable fear, affirmative (Form I-589)³², defensive, and Nicaraguan Adjustment and Central American Relief Act (Form I-881)³³ processes. It provides the means for tracking asylum cases as they progress from application filing through final determination/decision or referral to U.S. Immigration Courts. RAILS maintains and controls the inventory of all A-Files, queries the file location, and manages the request and transfer of A-Files between Asylum Offices and Field Control Offices. Global electronically inputs the A-Number and Field Control Office into RAILS. RAILS provides file location information. RAILS has a direct connection to Global.

³⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR CENTRAL INDEX SYSTEM, DHS/USCIS/PIA-075, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR USCIS ASYLUM DIVISION, DHS/USCIS/PIA-027, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³² See Form I-589, Application for Asylum and for Withholding of Removal, available at <https://www.uscis.gov/sites/default/files/document/forms/i-589.pdf>.

³³ See Form I-881, Application for Suspension of Deportation or Special Rule Cancellation of Removal (Pursuant to Section 203 of Public Law 105-100 (NACARA)), available at <https://www.uscis.gov/sites/default/files/document/forms/i-881.pdf>.



- **Computer Linked Application Information Management System 3 (CLAIMS 3)**³⁴ is a case management system used to process immigration requests except for naturalization, intercountry adoption, and certain requests for asylum and refugee status.³⁵ CLAIMS 3 supports the maintenance and tracking of officer casework documentation for many immigration-related requests. CLAIMS 3 exchanges information with RAILS via the Enterprise Gateway and Integration Services (EGIS)³⁶. Through EGIS, RAILS obtains limited information from CLAIMS 3 pertaining to the subject of the record, the system user, and the location of electronic and paper immigration files to track the locations of immigration files. RAILS shares the location and creation of paper and electronic immigration files with CLAIMS 3.
- **Customer Relationship Interface System (CRIS)**³⁷ is a web-based system accessible through the USCIS website that provides customers with pending immigration benefit application case status information and estimated processing times. RAILS provides file location information through a direct connection with CRIS.
- **USCIS Electronic Immigration System (USCIS ELIS)**³⁸ is an electronic case management system that allows USCIS to process certain immigration benefit requests. USCIS ELIS also maintains electronic A-Files. USCIS ELIS queries RAILS for file location and stores the current Field Control Office location of the A-File in USCIS ELIS. USCIS ELIS sends a file transfer request to RAILS. USCIS ELIS sends the receipt number to RAILS. RAILS stores the USCIS ELIS receipt number, so RAILS

³⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR COMPUTER LINKED APPLICATION INFORMATION MANAGEMENT SYSTEM, DHS/USCIS/PIA-016, available at <https://www.dhs.gov/uscis-pias-and-sorns>.

³⁵ The term “certain requests” for refugee and asylum benefits includes the “follow to join” petition (Form I-730). “Follow to join” is an option offered to family members of the principal beneficiaries of approved asylum and refugee status. Immediate family members (spouses and children under the age of 21) may qualify for derivative status. An individual who entered the United States and was granted asylum/refugee status within the past two years may petition to have their spouse and/or unmarried children “follow-to-join” them in the United States and obtain derivative status. The derivative individuals may be in the United States or outside the United States.

³⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR ENTERPRISE GATEWAY AND INTEGRATION SERVICES, DHS/USCIS/PIA-080, available at, <https://www.dhs.gov/uscis-pias-and-sorns>.

To support DHS’s modernization efforts, USCIS has shifted its use of the Enterprise Business Services 2 to EGIS to connect and share data from different operating USCIS Systems. The ESB 2 is in the process of being decommissioned.

³⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR CUSTOMER RELATIONSHIP INTERFACE SYSTEM, DHS/USCIS/PIA-019, available at, <https://www.dhs.gov/uscis-pias-and-sorns>.

³⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR USCIS ELECTRONIC IMMIGRATION SYSTEM, DHS/USCIS/PIA-056, available at, <https://www.dhs.gov/uscis-pias-and-sorns>.



users will know there is a case file in USCIS ELIS. RAILS has a direct connection to USCIS ELIS.

- **Immigrant Visa Content Service (IVCS)**³⁹ establishes an interface with the Department of State to intake digitized Immigration Visa petition forms and their supporting electronic documents to create electronic A-Files that will be stored in USCIS' Content Management Service (formerly Electronic Document Management Service). This solution replaced the physical, paper A-Files that had been created for the Immigrant Visa process. Once a digitized receipt file is created or deleted in IVCS, the information is pushed to RAILS. RAILS provides file location information to IVCS. RAILS has a direct connection to IVCS but does not share any information with the Department of State directly.
- **Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR)**⁴⁰ is a repository that contains copies of the systems discussed above and consolidates information collected during the adjudication of applications and petitions for immigration benefits. The USCIS RAILS/eCISCOR interface tracks the file location from RAILS and updates it to the eCISCOR data store. eCISCOR also monitors changes in RAILS and pulls those changes in real-time through a direct connection. Recently, file access and location information were provided to IMPACT⁴¹ and the Person Centric Query System⁴² through the eCISCOR data store.
- **FOIA Immigration Records System (FIRST)**⁴³ is a cloud-based technology used to

³⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR INTEGRATED DIGITIZATION DOCUMENT MANAGEMENT PROGRAM, DHS/USCIS/PIA-003, *available at*, <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR ENTERPRISE CITIZENSHIP AND IMMIGRATION SERVICES CENTRALIZED OPERATIONAL REPOSITORY, DHS/USCIS/PIA-023, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴¹ IMPACT, a system designed to automate the identification of risk factors for immigration benefit requests, will now receive information about the location and status of immigration files (e.g., whether it has been digitized, properly consolidated, and is a multi-volume file) from RAILS.

⁴² The Person Centrix Query System allows a user or system to submit a single query for all transactions involving an individual across 30 service endpoints including DHS (RAILS), Department of State (DoS), and Department of Justice (DOJ) systems and returns a consolidated/correlated view of the individual's past interactions with the government agency they pass through in U.S. immigration. The Person Centrix Query System through eCISCOR will now receive file location and status information as well. The Person Centrix Query System also retrieves and temporarily displays information from connected other USCIS systems which include RAILS.

⁴³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR, FOIA IMMIGRATION RECORDS SYSTEM (FIRST), DHS/USCIS/PIA-077, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.



process Freedom of Information Act (FOIA)⁴⁴ requests, Privacy Act⁴⁵ requests, and Privacy Act amendment requests from any eligible person or entity requesting access to, or the amendment of, a USCIS record. It is a public-facing portal that enables members of the public to submit FOIA/Privacy Act requests online and facilitates electronic responses. It serves as an internal case management system for USCIS. FIRST queries RAILS for file location and requests files for transfer for FOIA processing.

- **Content Management Service (CMS)**⁴⁶ is a cloud-based platform used across USCIS to manage immigration-related content accessed and retrieved through a user interface called STACKS⁴⁷ (not an acronym), or through separate USCIS interconnected systems. The development of Content Management Service enabled a backend repository and content services for other USCIS applications. It supports document management, document imaging, records management, workflow, and document-centric collaboration. Recently, as part of the effort to modernize the Immigration Visa process, A-Files were transitioned from the Electronic Document Management Service⁴⁸ to Content Management Service. With this transition, users can search, retrieve, and view digitized A-Files and receipt files. USCIS scans the contents of an immigrant file and electronically stores the digital images in this system. When a file is digitized, Content Management Service sends updates to RAILS on a real-time basis with the location of the digitized file, which allows RAILS to notify the RAILS user that the immigration file is electronically available in Content Management Service. RAILS has a direct connection to Content Management Service.
- **Fraud Detection and National Security-Data System (FDNS-DS)**⁴⁹ is the central repository for all data gathered during the processes of administrative investigation,

⁴⁴ The Freedom of Information Act, 5 U.S.C. § 552, is a federal freedom of information law that requires the full or partial disclosure of records controlled by the United States government upon request.

⁴⁵ The Privacy Act of 1974, a United States federal law, establishes a Code of Fair Information Practice that governs the collection, maintenance, use, and dissemination of personally identifiable information about individuals that is maintained in systems of records by federal agencies.

⁴⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR, CONTENT MANAGEMENT SERVICES, DHS/USCIS/PIA-079, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.

⁴⁷ STACKS is a digital file viewing and content management system for official immigration records as part of the Content Management (CSM) directly supporting eProcessing. It allows users to create, edit, and remove case contact information through a user interface.

⁴⁸ Recently, as part of the effort to modernize the Immigration Visa process, relevant A-Files were transitioned from the Electronic Document Management Service. The Electronic Document Management Service was decommissioned in 2023.

⁴⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, PRIVACY IMPACT ASSESSMENT FOR FRAUD DETECTION AND NATIONAL SECURITY-DATA SYSTEM, DHS/USCIS/PIA-013, *available at* <https://www.dhs.gov/uscis-pias-and-sorns>.



background, identity, and security checks, and analysis of benefit fraud rates/trends. FDNS-DS allows FDNS Immigration Officers to cross-reference background, identity, security check, and adjudicative process information for immigration applications and petitions with suspected or confirmed immigration fraud, public safety issues, and/or national security concerns. The RAILS/FDNS-DS interface is used for FDNS-DS to retrieve the physical locations of A-Files.