



Privacy Impact Assessment

for the

Enterprise Contact eXperience System

DHS Reference No. DHS/USCIS/PIA-054

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Homeland
Security



Abstract

1. The abstract is the single paragraph that will be used to describe the program and the Privacy Impact Assessment.¹

The United States Citizenship and Immigration Services, Office of Information Technology, Enterprise Infrastructure Division operates the Enterprise Contact eXperience system, which will replace the Enterprise Call Center system. The Enterprise Contact eXperience system is a cloud-based communications technology platform that provides a core common service solution to administer support for the United States Citizenship and Immigration Services External Affairs Directorate, Office of Access and Information Services, which manages the Customer Engagement Center and its initiatives. The Enterprise Contact eXperience system is centered on meeting the increased demand from the public for immigration services while modernizing the current United States Citizenship and Immigration Services call center design. This privacy impact assessment discusses the Enterprise Contact eXperience system and evaluates the privacy risks and mitigations associated with its collection, use, and maintenance of personally identifiable information.²

Overview

2. The overview provides the context and background necessary to understand the project's purpose and mission and the justification for operating a privacy sensitive project.

The United States Citizenship and Immigration Services oversees lawful immigration to the United States. An important aspect of United States Citizenship and Immigration Services' mission is to provide effective customer-oriented immigration benefit and information services. To that end, the United States Citizenship and Immigration Services Customer Engagement Center will utilize the Enterprise Contact eXperience system to streamline the processing of customer inquiries and improve the customer's overall experience. A customer may be an applicant, petitioner, employer, attorney, paralegal, accredited representative, community-based

¹ Pursuant to Section 208 of the E-Government Act of 2002, agencies are required to conduct a Privacy Impact Assessment before developing or procuring information technology systems or projects that collect, maintain, or disseminate information in identifiable form from or about members of the public. The Office of Management and Budget issued Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, which defines "information in identifiable form" as information in an information technology system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements. Furthermore, an individual is defined as "a citizen of the United States or an alien lawfully admitted for permanent residence."

² This Privacy Impact Assessment replaces the existing DHS/USCIS/PIA-054 National Customer Service Center, available at <https://www.dhs.gov/United-States-Citizenship-and-Immigration-Services-pias-and-sorns>.



organization, or any other individual contacting the United States Citizenship and Immigration Services Customer Engagement Center for immigration-related information. The Office of Access and Information Services manages the United States Citizenship and Immigration Services Customer Engagement Center. The Office of Access and Information Services³ mission is to provide clear, accurate, and timely responses to customers' concerns and questions and engage the public through transparent dialogue that also promotes participation and feedback. The Office of Access and Information Services delivers effective information and services that help the applicant community learn and navigate the immigration journey through a digital and live help experience. The United States Citizenship and Immigration Services Customer Engagement Center serves as the primary source for customers to request assistance with applications and petitions, regulatory information (issued by various Executive branch agencies that applies to daily situations), and up-to-date status information on requests, benefit applications, and petitions, but cannot provide legal guidance or advice. During the process of assisting customers, personally identifiable information⁴ may be captured by United States Citizenship and Immigration Services.

The Enterprise Contact eXperience system is a cloud-based service solution that supports the United States Citizenship and Immigration Services Customer Engagement Center and contact center Tier-1 (Interactive Voice Response System), Tier-2 (Customer Service Representative), Tier-3 (Immigration Services Officer), Tier-4 (Management Program Analysts), and Language Services Section to provide United States Citizenship and Immigration Services with a modern capability to support the agency's customer service goals. Some of the functionality provided by the Enterprise Contact eXperience system includes enabling inbound and outbound agent calling; providing United States Citizenship and Immigration Services reporting; and voice call routing via Amazon Web Services Connect and Chat Routing to the System for Tracking, Activities, Relationship, and Services customer service relationship management, which streamlines support, enables self-service, and promotes a better customer experience.⁵ The

³ Formerly known as the Office of Citizenship and Applicant Information Services.

⁴ U.S. Department of Homeland Security defines personally identifiable information as any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the United States, or employee or contractor to the Department. "Sensitive personally identifiable information" is personally identifiable information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this privacy impact assessment, sensitive personally identifiable information and personally identifiable information are treated the same.

⁵ System for Tracking, Activities, Relationship, and Services is a major United States Citizenship and Immigration Services system hosted in the Salesforce Government Cloud. The United States Citizenship and Immigration Services is utilizing the Salesforce Government Cloud Software as a Service solution to securely deliver applications to meet the United States Citizenship and Immigration Services' needs. The System for Tracking, Activities, Relationship, and Services was built and tailored by the United States Citizenship and Immigration Services to address the needs of various United States Citizenship and Immigration Services offices and operations. *See* U.S. Department Of Homeland



Enterprise Contact eXperience system assures a single accreditation boundary for projects using the Amazon Web Services Connect services to deliver contact center-as-a-service, which is consistent with United States Citizenship and Immigration Services requirements.

The Enterprise Contact eXperience system captures and stores call data for the purpose of analyzing call volume trends, commonly asked questions, agent performance, and system performance through its reporting capabilities. Within the Enterprise Contact eXperience system, customer service agents may use a laptop computer to place, receive, and otherwise handle voice calls from any location (i.e., in-office or teleworking). In the Enterprise Contact eXperience system, agents have one application screen from which they can perform their critical searches for information requested instead of having to use multiple United States Citizenship and Immigration Services source system applications. The Interactive Voice Response System, which is available in English and Spanish, presents callers with a list of self-service options. A caller navigates through the system menus by using his or her telephone keypad or voice commands to retrieve general information without live assistance from a United States Citizenship and Immigration Services representative. The Interactive Voice Response System also handles application status or other case-specific questions. The Interactive Voice Response System allows a customer to telephonically check on the status of his or her pending immigration benefit application or petition through the Customer Relationship Interface System⁶ Case Status Service Online. By entering his or her receipt number, a unique confirmation number that United States Citizenship and Immigration Services provides the customer upon receipt of an application or petition for immigration benefits, a recording provides the caller with a current status of the case. Enterprise Contact eXperience customers may have their calls transferred to contractor-operated contact centers representatives (Tier 1) when the Interactive Voice Response information or services do not suffice. Additionally, Enterprise Contact eXperience is a fully managed cloud-based service that facilitates geographic redundancy⁷, disaster recovery, and surge capability as the number of system users increases.

The Enterprise Contact eXperience system solution provides the following summary of capabilities:

Security, Privacy Impact Assessment for the Department of Homeland Security Correspondence and Inquiries Tracking Tools, DHS/ALL/PIA-007 (2007 and subsequent updates), *available at* <https://www.dhs.gov/privacy-documents-department-wide-programs>.

⁶ See U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services Privacy Impact Assessment for the Customer Relationship Interface System, DHS/USCIS/PIA-019 (2008 and subsequent updates), *available at* [https://www.dhs.gov/publication/dhsUnited States Citizenship and Immigration Servicespia-019b-customer-relationship-interface-system-cris](https://www.dhs.gov/publication/dhsUnited%20States%20Citizenship%20and%20Immigration%20Servicespia-019b-customer-relationship-interface-system-cris).

⁷ Geographic redundancy, also known as geo-redundancy or geo-redundant storage, is the practice of distributing critical infrastructure components, such as servers, across multiple data centers in different geographic locations.



- Call Routing – based on agent availability, priority, and business needs.
- Call recording, screenshot capture, workforce management tools for technical security, employee performance, and service quality control.
- Workforce Management/Optimization and Voice Callback.
- Multi-channel access methods.
- Intelligent Virtual Assistant (Question-and-Answer Lexbots used in both the Interactive Voice Response and the Emma Chatbot).
- Network and Security Operations Centers support.
- Contact Control Panel – Amazon Web Services Connect softphone for receiving voice calls from the Interactive Voice Response System.
- Operational Management Portal allows system administrators to add, remove, or edit prompts in the Interactive Voice Response System, change hours of operations, close queues, and create holiday and emergency messages.
- Amazon Simple Email Service is an email platform that provides an easy, cost-effective way for a customer to send and receive email using their own email addresses and domains.

The Enterprise Contact eXperience system provides useful general information regarding immigration benefits, promotes an understanding of citizenship, and helps ensure the integrity of the United States immigration system. The Enterprise Contact eXperience system provides an integrated set of products and services, tailored to the specific requirements of United States Citizenship and Immigration Services, and serves as the foundation for a robust and flexible solution that aims to enhance the customer's service experience. For context, the United States Citizenship and Immigration Services Customer Engagement Center receives approximately 15 million calls per year. The current locations of the Customer Engagement Center offices are:

- New York, New York (Eastern Telephone Center and Language Service Section)
- Overland Park, Kansas
- Los Angeles, California (Western Telephone Center)
- Camp Springs, Maryland (Headquarters)
- Barbourville, Kentucky
- Bossier City, Louisiana
- United States Citizenship and Immigration Services teleworking employees (nationwide)

Customer Engagement Center's/ Enterprise Contact eXperience Main Components:



Amazon Web Services Connect Interactive Voice Response System

The Enterprise Contact eXperience system uses the Amazon Web Services Connect⁸ Interactive Voice Response System, which is available in English and Spanish. It will continue to be used as the automated voice that the public hears when they first contact United States Citizenship and Immigration Services through one of its several published toll-free phone numbers. The public interacts with this system using natural language and, despite heavy accents, background noise, and complicated questions, the Interactive Voice Response System can consistently interpret and respond to the caller's intents while maintaining a high customer satisfaction rate (approximately 4.5 out of 5.0 possible points). The Interactive Voice Response System handles all calls from the public using Amazon Connect. The Interactive Voice Response System is an automated, speech-enabled, natural-language service that can provide callers with highly accurate intent analysis (to better respond to their requests) and more self-service options. When the caller's intent satisfies certain specific business rules, the caller may be transferred by the Interactive Voice Response System to a live agent. United States Citizenship and Immigration Services Call Center Tier 1 Customer Service Representatives handle a small subset of customer calls that the Interactive Voice Response System transfers to a live agent.

The Interactive Voice Response System also handles application status or other case-specific questions. For instance, the Interactive Voice Response allows a customer to check on the status of their pending immigration benefit request through the System for Tracking Activities, Relationships, and Services customer relationship management tool which interfaces with the Customer Relationship Interface System Case Status Service Online, which allows callers to receive a current status of their case.

Intelligent Virtual Assistant

The Intelligent Virtual Assistant (IVA, "Chatbot", or Emma) is accessible on the United States Citizenship and Immigration Services website to field immigration-related questions. The Emma Web Chatbot is a solution that combines Amazon Web Services Lexbot,⁹ Lambda,¹⁰ and SageMaker¹¹ to create a bot that users can interact with via text chat, asking questions about United States Citizenship and Immigration Services and getting responses in a conversational

⁸ Previously known as Maximus Intelligent Assistant.

⁹ Amazon Lexbot is a fully managed artificial intelligence service with advanced natural language models to design, build, test, and deploy conversational interfaces in applications.

¹⁰ Amazon Lambda is a serverless computing service that lets developers run code without managing servers. It automatically handles the underlying compute resources, including scaling and logging.

¹¹ Amazon SageMaker is a machine learning service that helps data scientists and developers build, train, and deploy machine learning models.



manner.



Omnichannel Automated Survey Tool

The Omnichannel Automated Survey Tool enables the Office of Access and Information Services to make improvements to the services provided to the public through the online voluntary feedback collected by Enterprise Contact eXperience and the contact centers. United States Citizenship and Immigration Services values the feedback of its stakeholders and actively seeks their input. The Omnichannel Survey Tool provides an online questionnaire to collect information about the experience of applicants and stakeholders after they contacted United States Citizenship and Immigration Services to include their level of satisfaction with the services, they received from United States Citizenship and Immigration Services.

The Omnichannel Automated Survey Tool solution is a commercial-off-the-shelf product that is a Federal Risk and Authorization Management Program compliant tool and is housed in the Amazon Web Services Government cloud environment. This tool has been added to the Enterprise Contact eXperience system boundary.

System for Tracking Activities, Relationships, and Services

The Enterprise Contact eXperience system and call centers use the System for Tracking Activities, Relationships, and Services to connect a customer to a live agent via voice or Web chat, using the Contact Control Panel (Web-based softphone), which is an agent interface that allows agents to conduct and receive call transfers from the Interactive Voice Response system, or with a Live Agent (United States Citizenship and Immigration Services contractor call center representative).



Additional Enterprise Contact eXperience Features and Functionalities

The Enterprise Contact eXperience system contact center includes the following enhanced features and functionalities:

- **Amazon Web Services Connect** is a cloud contact center with omni-channel capabilities.¹² Businesses can quickly set up a contact center, add people from anywhere to the contact center, and begin engaging with customers. Being an open platform, it will also be integrated with other applications, like the System for Tracking Activities, Relationships, and Services. The only personally identifiable information collected is phone number and receipt number.
- **Amazon Simple Storage Service** is an object storage service that offers industry-leading scalability, data availability, security, and performance. Customers of all sizes and agencies can use Amazon Simple Storage Service to store and protect any amount of data for a range of use cases. The only personally identifiable information collected is receipt number.
- **Amazon QuickSight** is a business analytics service provided by the Amazon Web Services Connect. QuickSight provides easy to use tools to build visualizations, perform ad-hoc analysis, get business insights from data, and share the results with others. No personally identifiable information is collected.
- **Operations and Management Portal** is a solution provided by Amazon Web Services Connect, which allows administrators to add, remove, and edit prompts in the Interactive Voice Response System, change hours of operations, close queues, and create holiday and emergency messages. No personally identifiable information is collected.
- **Amazon Simple Email Service** is an email platform used by Interactive Voice Response System that provides an easy, cost-effective way to send email using the caller's own email addresses and domains. The only personally identifiable information collected is email address.
- **Amazon Pinpoint** is an Amazon Web Services Connect service used to engage with customers across multiple messaging channels. The Enterprise Contact eXperience system and center will use Amazon Pinpoint to send push notifications, in-app notifications, emails, text messages, voice messages, and messages over custom channels. The only personally identifiable information collected is phone numbers.
- **Amazon Web Services Lambdas** is an Amazon Web Services service that allows developers to execute code in a cloud environment. The only personally identifiable information collected is receipt number.

¹² <https://intellipaat.com/blog/omni-channel-salesforce/#no1>.



- **Federal Risk and Authorization Management Program NexTalk Teletypewriter** provides the Enterprise Contact eXperience system with communication software for the deaf or hard of hearing. It was initially developed for people with hearing or speech difficulties to communicate over traditional telephone networks. Teletypewriter devices translate typed text into electronic signals sent across the telephone network and retranslated to text at the other end. No personally identifiable information is collected.
- **United States Citizenship and Immigration Services ServiceNow Help Desk** serves as the incident management system for the agency's internal service requests and does not directly service the public. The goal of incident management is to restore normal service operations as quickly as possible following service disruptions to minimize the impact on business operations. The United States Citizenship and Immigration Services ServiceNow Help Desk serves as the single point of contact for logging, assigning, tracking, reporting, and resolving service requests for United States Citizenship and Immigration Services personnel and other individuals who have access to United States Citizenship and Immigration Services information systems (non- United States Citizenship and Immigration Services personnel). It also allows United States Citizenship and Immigration Services IT Support Technicians to log tickets, classify tickets according to impact and urgency, assign tickets to appropriate groups, and escalate and manage tickets through to resolution. United States Citizenship and Immigration Services ServiceNow does not support Service Desk tickets for public users seeking IT support for public-facing systems. United States Citizenship and Immigration Services offers other service support avenues for individuals experiencing issues with United States Citizenship and Immigration Services public-facing systems.

To submit a service request, United States Citizenship and Immigration Services personnel may initiate a Service Desk ticket through the self-service portal, called myIT, or contact the Service Desk by phone or email. All self-created Service Desk tickets are instantaneously processed and may be immediately accessed by the United States Citizenship and Immigration Services personnel who submitted the initial service request. Non- United States Citizenship and Immigration Services personnel cannot make requests on the portal. Non- United States Citizenship and Immigration Services personnel must call the Help Desk to report and resolve issues. All internal users seeking IT support or access to United States Citizenship and Immigration Services -owned systems can call the United States Citizenship and Immigration Services Service Desk to report a service incident. The only personally identifiable information collected is United States Citizenship and Immigration Services employee or contractor full name, username, and work email.

- **Toll-Free Service** is an inbound calling service that enables callers across the United



States, and United States territories (Puerto Rico, U.S. Virgin Islands, Guam, Saipan, and American Samoa), to place calls that are free to the caller but charged to United States Citizenship and Immigration Services. No personally identifiable information is collected.

- **Work-Force Management/Quality Assurance** is a process encompassing all the analyses processed against customer service representative data, scheduling data, quality scores, and skills information which the contact center uses as a tool to have the right number of staff available at the right time. The Work-Force Management tools assist United States Citizenship and Immigration Services in scheduling staff and forecasting call volumes. These tools also assist United States Citizenship and Immigration Services with the design and management of evaluation and assessment forms, training content production, strategic resource planning and real time score carding. Quality Assurance is how the quality of the interactions with the public are monitored and measured through use of analytics, coaching and training to routinely identify and correct issues and improve performance customer and customer service representative satisfaction. The only personally identifiable information collected is United States Citizenship and Immigration Services employee or contractor full name, username, and work email.
- **BriteVerify** is an email verification and validation software that validates email addresses in real time. The only personally identifiable information collected is United States Citizenship and Immigration Services employee or contractor work email.
- **APIgee Customer Relationship Interface System Automated Programming Interface**¹³ is a third-party tool used by the Intelligent Voice Response System to send the receipt number to the Customer Relationship Interface System, which returns case status information back to the Interactive Voice Response. The only personally identifiable information collected is receipt number and A-File Number.

System Access

Enterprise Contact eXperience system administrators and developers can access the Amazon Web Services Management Console, Amazon Web Services Software Development Kit, and Amazon Web Services Command Line Interface. Access to Amazon Connect requires credentials that Enterprise Contact eXperience system administrators and developers can use to authenticate user requests. The credentials have permissions that authorize access to Amazon Web Services resources based on their job function. All United States Citizenship and Immigration Services user accounts are managed by the United States Citizenship and Immigration Services Identity, Credential, and Access Management system, and accounts are

¹³ APIgee is Google Cloud's native application programming interface management platform used to build manage, and secure APIs.



managed by Amazon Web Services using Federal Risk and Authorization Management Program-vetted controls. All Enterprise Contact eXperience system administrator and developer accounts are granted through the Enterprise Contact eXperience system's government approval. This requires the user to complete a myAccess Business System Access Request form prior to receiving access to the Enterprise Contact eXperience system. All users of these accounts are required to be United States citizens, receive a complete background investigation, and a validated United States Citizenship and Immigration Services entry-on-duty date. All users must have an authorized need-to-know to fulfill their official duties before system role membership is granted. The United States Citizenship and Immigration Services Identity, Credential, and Access Management system maintains a complete list of these authorized users of the information system and authorized administrators and developers of the information system, and they are reviewed annually by the assigned information system security officer.

Additionally, United States Citizenship and Immigration Services personnel are required to annually submit the Rules of Behavior and complete the Computer Security Awareness Training within 24 hours of the first network logon or the account will be subject to suspension for non-compliance. Also, United States Citizenship and Immigration Services personnel with administrator roles and developers are required to take the privilege administrator training.

Fair Information Practice Principles

The U.S. Department of Homeland Security conducts Privacy Impact Assessments on developed or procured information technology systems involving the collection, maintenance, or dissemination of information in identifiable form or that make substantial changes to existing information technology that manages information in identifiable form, as required by Public Law 107-347, Section 208, "The E-Government Act of 2002," and any applicable and implementing Office of Management and Budget guidance; or proposed rulemakings affecting personal information as required by Section 222(a)(4) of the Homeland Security Act of 2002; or technologies that sustain, and do not erode, privacy protections relating to the use, collection, and disclosure of personal information pursuant to 6 U.S.C § 142(a)(1).

In response to these obligations, the U.S. Department of Homeland Security Privacy Office developed a set of Fair Information Practice Principles¹⁴ from the underlying concepts of the Privacy Act of 1974¹⁵ to encompass the full scope of the information and interactions of the U.S.

¹⁴ See U.S. Department of Homeland Security, Privacy Policy Guidance Memorandum 2008-01, The Fair Information Practice Principles: Framework for Privacy Policy at the Department of Homeland Security (2008), *available at* <https://www.dhs.gov/privacy-policy-guidance>.

¹⁵ Privacy Act of 1974, 5 U.S.C. § 552a, as amended.



Department of Homeland Security. The Fair Information Practice Principles account for the nature and purpose of the information being collected in relation to the U.S. Department of Homeland Security's mission to preserve, protect, and secure. The Fair Information Practice Principles are a set of eight principles that are rooted in the tenets of the Privacy Act.

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

The authority to collect the stated information by the Enterprise Contact eXperience system and call centers is found within the Immigration and Nationality Act, 8 U.S.C. §§ 1101, 1103, 1201, and 1255,¹⁶ as stated below, and in the following public laws:

- Immigration and Nationality Act § 101, 8 U.S.C. § 1101 et seq. authorizes the collection, use, and processing of personal information for the purpose of adjudicating applications for immigration benefits.
- Public Law 107-347,¹⁷ "E-Government Act of 2002" – established a broad framework of measures that require using Internet-based technology to enhance citizen access to government information and services. Section 202(b) encourages all agencies to measure performance with a special consideration toward customer service.
- Public Law 103-62,¹⁸ "Government Performance and Results Act of 1993" – requires federal agencies to engage in performance management tasks such as setting goals, measuring results, and reporting their progress based on objective criteria.
- Public Law 111-352,¹⁹ "Government Performance and Results Modernization Act of 2010" – requires agencies to implement a more fact-based decision-making framework and to be more results-oriented.

4. Will this information be maintained as part of system of records,²⁰ as defined in

¹⁶ 8 U.S.C. §§ 1101, 1103, 1201, and 1255.

¹⁷ E-Government Act of 2002, Public Law 107-347, available at <https://www.gpo.gov/fdsys/pkg/PLAW-107publ347/pdf/PLAW-107publ347.pdf>.

¹⁸ Government Performance and Results Act of 1993, Public Law 103-62, available at <http://www.whitehouse.gov/omb/mgmt-gpra/gplaw2m.html>.

¹⁹ Government Performance and Results Modernization Act of 2010, Public Law 111-352, available at <https://www.gpo.gov/fdsys/pkg/PLAW-111publ352/pdf/PLAW-111publ352.pdf>.

²⁰ The term "system of records" means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.



the Privacy Act, 5 U.S.C. §552a?

The personally identifiable information collected, used, and maintained by the Enterprise Contact eXperience system associated with the Customer Engagement Center is covered by the following System of Records Notices:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records²¹ 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-007 Benefits Information System²² 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.
- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records²³ 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/ALL-004 General Information Technology Access Account Records System²⁴ covers the Department of Homeland Security employee network information retained and used by United States Citizenship and Immigration Services systems to permit access.

5. From which population does the project collect, maintain, use, and/or disseminate personally identifiable information²⁵?

☒ a. Members of the public

²¹ See DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 Fed. Reg. 43556 (September 18, 2017), available at <https://www.dhs.gov/system-records-notices-sorns>.

²² See DHS/USCIS-007 Benefits Information System, 81 Fed. Reg. 72069 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

²³ See DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 Fed. Reg. 74781 (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, 77 Fed. Reg. 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

²⁵ Personally identifiable information means any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual. See OMB M-06-19, Reporting Incidents Involving Personally Identifiable Information.



- ☒ b. U.S. Department of Homeland Security employees and/or contractors
- ☐ c. Other federal employees

6. What personally identifiable information is collected, maintained, used, or disseminated?

During a call with a live customer service representative, Customer Engagement Center personnel may request information directly from the United States Citizenship and Immigration Services customer to further assist with immigration case-related questions and issues, including authentication. The specific data elements collected are dependent on the nature of the call. Information collected may include:

- Full name,
- Application receipt number,
- A-File Number,
- Date of birth,
- Country of birth,
- Country of citizenship,
- Home address,
- Telephone number,
- Email address, and
- A description of case-related issue(s).

The following elements are collected from United States Citizenship and Immigration Services employees and contractors:

- Company ID
- User ID

7. What is the intended use of personally identifiable information?



The Enterprise Contact eXperience system and call center collect and uses information pertaining to the individual, including names, addresses, and personal feedback, for any of the following purposes:

- Assist callers with obtaining documents, regulatory information, up-to-date status information on immigration-related benefits requests, and other information;
- Evaluate callers' experiences and modify different aspects of the Customer Engagement Center to improve customer satisfaction and call center services and better train employees;
- Return calls to provide the customer with assistance; and
- Keep an accurate record of calls.

The system also collects information from United States Citizenship and Immigration Services employees and contractors for customer service quality assurance.

8. How long and under which retention schedule is the information retained?

All call data, including Customer Engagement Center call recordings and screen captures (if available), are retained for the duration required by the applicable Enterprise Contact eXperience system business unit. Generally, call recordings are stored for a period of one year and agent screen captures are stored for up to six months, in accordance with National Archives and Records Administration General Records Schedule 6.5. This is done to satisfy legal/Freedom of Information Act/Privacy Act responsibilities, United States Citizenship and Immigration Services recordkeeping requirements, service quality assurance, and training purposes.

Information collected directly from the caller, which may include personally identifiable information used to assist with case-related questions and issues, is retained in accordance with National Archives and Records Administration General Records Schedule 6.5 (Public Customer Service Records).²⁶ Information is to be destroyed one year after the underlying issue or concern is resolved, or when no longer needed for business use, whichever is appropriate.

Personally identifiable information may be incidentally collected during call recordings and screen captures of the employee's desktop screen for the purpose of Quality Assurance. All call recordings are stored for a period of one year, and customer service representative screen captures are stored for up to six months. All call data, including the Enterprise Contact eXperience system and center call recordings and screen captures (if available), are retained for

²⁶ See National Archives and Records Administration, Request For Records Disposition Authority, Records Schedule Number DAA-GRS-2017-0002-0001 (2017), available at <https://www.archives.gov/files/records-mgmt/grs/grs06-5.pdf>.



the duration required by the applicable Enterprise Contact eXperience Business Unit, and in accordance with National Archives and Records Administration General Records Schedule 6.5. This is done to satisfy Freedom of Information Act requirements as well as to assist in troubleshooting, training, and researching issues. An automatic purge occurs after the retention period has elapsed for the data.

The Enterprise Contact eXperience's infrastructure development records, which exclude system data or content including personally identifiable information, are retained in accordance with National Archives and Records Administration General Records Schedule 3.1,²⁷ and are destroyed five years after the system is superseded by a new iteration, or is terminated, defunded, or no longer needed for agency/information technology administrative purposes, but longer retention is authorized if required for business use.

9. With whom will personally identifiable information be shared?

<input type="checkbox"/> Within the Component/Office	Specify:
<input type="checkbox"/> Non-U.S. Department of Homeland Security Component(s)/Office(s)	Specify:
<input type="checkbox"/> State, local, tribal, or territorial entities	Specify:
<input type="checkbox"/> Public	Specify:
<input type="checkbox"/> Private sector	Specify:
<input type="checkbox"/> Foreign governments	Specify:
<input type="checkbox"/> Foreign entities	Specify:
<input checked="" type="checkbox"/> Other:	Specify: United States Citizenship and Immigration Services does not share information collected by the Enterprise Contact eXperience system and call center and its associated systems with external entities as part of normal daily operations. However, consistent with Department of Homeland Security's information sharing mission, information may be shared with other Department of Homeland Security components

²⁷ See National Archives and Records Administration, Request For Records Disposition Authority, Records Schedule Number DAA-GRS-2013-0005-0006, U.S. NARA, General Technology Management Records (2019), available at <https://www.archives.gov/files/records-mgmt/grs/grs03-1.pdf>.



that have a need-to-know the information to carry out their national security, law enforcement, immigration, intelligence, or other homeland security functions. In addition, Department of Homeland Security and United States Citizenship and Immigration Services may share information with appropriate federal, state, local, tribal, territorial, foreign, or international government agencies consistent with the routine uses set forth in the applicable System of Records Notice: DHS/USCIS-007 Benefits Information System.

10. How are individuals provided notice prior to the collection of information? If notice is not provided, explain why not.

Prior to the collection or processing of any personal information, United States Citizenship and Immigration Services provides a Privacy Act Statement or Privacy Notice on applicable benefit request forms and a recorded statement prior to the collection of any information as required by Section (e)(3) of the Privacy Act. The Privacy Act Statement/Privacy Notice notifies the individual about the authority to collect the information requested, purposes for collecting it, routine uses, and consequences of providing or declining to provide the information to United States Citizenship and Immigration Services. Additionally, the individual is also provided notice that phone calls may be recorded for quality assurance and telephone numbers may be used to contact the customer about the customer service experience. Individuals are also provided general notice through the publication of this Privacy Impact Assessment and DHS/USCIS-007 Benefits Information System, system of record notice.

If United States Citizenship and Immigration Services randomly selects the customer for a customer survey, the contractor advises the individual that participation is voluntary before beginning the survey. Prior to conducting the telephone survey, the contractor verbally notifies the customer of the purpose of the customer satisfaction assessment, instructions on how to participate, and how to opt out of future requests.

11. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out?



Use of the Enterprise Contact eXperience system and call center services is voluntary. Before collecting information from the caller, United States Citizenship and Immigration Services provides the caller with a recorded Privacy Act Statement that notifies the caller that providing the requested information to United States Citizenship and Immigration Services is voluntary. The caller may decline to provide information by hanging up the phone or refusing to provide the Customer Service Representative or Immigration Services Officer with the requested information. If a customer later receives a call to complete a survey, the contractor notifies the customer that participation is voluntary and provides the customer with instructions on how to opt out of future surveys.

12. What procedures are in place to allow individuals to correct inaccurate or erroneous information?

The Enterprise Contact eXperience system and call center allow individuals to directly engage with United States Citizenship And Immigration Service to amend an error in their application or check the status of their submission. Individuals may also direct all requests to access or amend information to the Freedom of Information Act/Privacy Act Office at United States Citizenship and Immigration Services at the address listed above. In the redress request, individuals must state clearly and concisely the information being contested, the reason for contesting it, and the proposed amendment to the information.

13. What administrative, technical, and physical controls are used to protect the information?

All United States Citizenship and Immigration Services personnel are required to complete annual privacy and security awareness training. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., System of Records Notices, Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information. In addition, both Tier 1 and Tier 2 personnel receive job-specific privacy training.

United States Citizenship and Immigration Services limits access to case management systems to United States Citizenship and Immigration Services personnel. United States Citizenship and Immigration Services must grant an employee access and issue the employee a username and password to gain access to the system. The information systems used to support the Enterprise Contact eXperience employ role-based access controls so only employee users with a need-to-know have access. The employee's supervisor determines need-to-know based on the employee's job responsibilities. Moreover, the systems that support the Enterprise Contact



eXperience provide a warning banner at all access points to deter unauthorized use of information by internal users. The banner warns users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance.

14. How does the Component ensure that personally identifiable information is used appropriately?

United States Citizenship and Immigration Services ensures that the practices stated in this Privacy Impact Assessment are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

Associated Privacy Risks and Mitigations

Privacy Risk:	There is a risk that United States Citizenship and Immigration Services will collect more information than is necessary.
Mitigation:	This risk is partially mitigated . The Enterprise Contact eXperience system ensures information accuracy by collecting information directly from the individual or their attorney or accredited representative. United States Citizenship and Immigration Services mitigates this risk through standard operating procedures that specify what information the Customer Service Representative or Immigration Services Officer may ask the caller to provide. Since the Enterprise Contact eXperience system involves a live conversation, United States Citizenship and Immigration Services cannot prevent the caller from providing more than the minimum information required to answer the caller's question. However, United States Citizenship and Immigration Services only retains the call recordings for a period of one year for legal and Freedom of Information Act/Privacy Act requirements, service quality assurance, and training purposes.
Privacy Risk:	There is a risk that United States Citizenship and Immigration Services will maintain inaccurate data.
Mitigation:	This risk is mitigated . United States Citizenship and Immigration Services only uses the information collected to assist with a caller's inquiry, return a customer's call through the callback application, conduct a customer satisfaction survey, and keep an accurate record of calls. United States



	Citizenship and Immigration Services deletes customer relationship management data in the System for Tracking Activities Relationships and Services system each day and phone recordings one year from the date of the call. United States Citizenship and Immigration Services also mitigates this risk by limiting the amount of time United States Citizenship and Immigration Services retains the information.
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Privacy Risk:	There is a risk of unauthorized access and dissemination of information.
Mitigation:	<p>This risk is mitigated. United States Citizenship and Immigration Services implements role-based access controls within the Customer Engagement Center, which operates on a two-tier model. United States Citizenship and Immigration Services contract personnel serve as the first level of customer service support for the Customer Engagement Center. Tier 1 Customer Service Representatives use Frequently Asked Questions pages, scripts, and operational guidelines developed by United States Citizenship and Immigration Services to assist customers. Tier 1 Customer Service Representatives may collect limited personally identifiable information to obtain case status information via Case Status Service Online or create a service request via Contact Relationship Interface System's Service Request Management Tool. Beyond these systems, the Tier 1 Customer Service Representatives do not have access to United States Citizenship and Immigration Services systems. If questions go beyond the scripted responses, Tier 1 Customer Service Representatives may transfer calls to Tier 2. Tier 2 has United States Citizenship and Immigration Services Immigration Services Officers who can provide case-specific information and detailed answers.</p> <p>Tier 2 Immigration Services Officers are United States Citizenship and Immigration Services adjudicators that have access to all USCIS major applications. Immigration Services Officers receive specific training and instruction relating to the proper use and dissemination of personally identifiable information. If an inquiry is case-specific, Standard Operating Procedures require Immigration Services Officers to authenticate and verify the caller's identity prior to disclosing personal information. This information collection, use, and dissemination is consistent with the United States Citizenship and Immigration Services goal of providing efficient service to the public.</p>



Privacy Risk:	There is a risk that negative feedback from customer satisfaction assessments could be linked to an individual and adversely impact the individual's benefit request.
Mitigation:	This risk is mitigated . United States Citizenship and Immigration Services keeps the Customer Feedback Survey anonymous and unlinked to a particular customer's records. Before conducting the survey, the contractor notifies the customer that the telephone survey is not mandatory and is conducted anonymously. The contractor also explains that the purpose of the survey is to improve customer satisfaction, provides instructions on how to complete the survey, and describes how to opt out of future calls. The customer satisfaction survey collects information pertaining to customer experiences and asks the customer to describe how they felt about the Enterprise Contact eXperience system and call center services. United States Citizenship and Immigration Services does not collect personally identifiable information from the individual during the customer satisfaction survey and does not link the responses back to the customer's records.
Privacy Risk:	There is a risk that individuals are not aware of the collection and use of their personally identifiable information.
Mitigation:	This risk is mitigated . The Enterprise Contact eXperience system and center services provide notice to individuals and their representatives seeking telephonic assistance. Prior to the collection of information, United States Citizenship and Immigration Services informs the customer through a recorded Privacy Act Statement/Privacy Notice that United States Citizenship and Immigration Services uses the collected information to respond to inquiries or requests for information. United States Citizenship and Immigration Services informs the customer that United States Citizenship and Immigration Services records telephone calls for quality assurance purposes, and telephone numbers are automatically collected and used to contact the customer about their experience with the Enterprise Contact eXperience system and center. The caller may decline to provide information by hanging up the phone or refusing to provide a Customer Service Representative or Immigration Services Officer with the requested information; however, that may prevent the customer from receiving assistance with their case and benefit-related questions via the Enterprise Contact eXperience system and center. United States Citizenship and Immigration Services also uses telephone numbers collected from the Enterprise Contact eXperience system and center to request voluntary



	participation in Customer Satisfaction Telephone Survey. During the callback, individuals are provided a notice with the purpose of the telephone survey, instructions on how to participate, and how to opt out of future calls. United States Citizenship and Immigration Services further advises individuals who choose to provide feedback that their responses are anonymous but used to help United States Citizenship and Immigration Services make informed decisions on customer support needs, potential system issues, future design priorities, and other concerns to better serve United States Citizenship and Immigration Services customers.
Privacy Risk:	There is a risk that personally identifiable information is retained longer than necessary to fulfill the specified purpose for the collection.
Mitigation:	This risk is mitigated . Although there is always risk inherent in retaining data for any length of time, the Enterprise Contact eXperience system and call center data retention periods are consistent with the concept of retaining data only for as long as necessary to support the agency's mission. The proposed Enterprise Contact eXperience system and call center retention and disposal schedule is based upon a need to keep the records available in case there are questions or complaints regarding a call. The drafted schedule complies with the requirements of the Federal Records Act and the stated purpose and mission of the systems.
Privacy Risk:	There is a risk of unauthorized sharing of information.
Mitigation:	This risk is mitigated . United States Citizenship and Immigration Services mitigates this risk by implementing strong oversight procedures. Currently, United States Citizenship and Immigration Services does not routinely share information collected by the Enterprise Contact eXperience with external agencies. United States Citizenship and Immigration Services has a formal review and approval process in place for new sharing initiatives. The proper review authorities must approve any new use of information or new access requests for the system. Any updates related to information sharing with external entities are reviewed prior to disclosure to ensure any instances of sharing are fully consistent with the DHS/USCIS-007 Benefits Information System of Records Notice.
Privacy Risk:	There is a risk that individuals do not have access and ability to correct their record.
Mitigation:	This risk is mitigated . United States Citizenship and Immigration Services



mitigates this risk by providing individuals multiple opportunities during and after the completion of the benefit request process to correct information. Customers may also contact the Enterprise Contact eXperience and report issues for as long as their cases are pending with United States Citizenship and Immigration Services. Although individual customers do not have access to United States Citizenship and Immigration Services case management systems, any information a customer finds on their immigration benefit documents (e.g., Permanent Resident Card, Travel Document, Employment Authorization Document) or identified during the call may be corrected by contacting the Enterprise Contact eXperience system and call center and explaining the error. A Tier-2 Immigration Services Officer can then provide information to the caller on the best way to correct the problem. Individuals may avail themselves of the redress and appeal process as stated in 6 CFR §§ 5.25-26.

Contact Official

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Responsible Official

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Approval Notice:

By signing below, the U.S. Department of Homeland Security Chief Privacy Officer approves this Privacy Impact Assessment for the Enterprise Contact eXperience System. If, however, during the operational course of this program or United States Citizenship and Immigration Services use of this technology changes from what has been documented or the U.S. Department of Homeland Security Privacy Office becomes aware of evidentiary changes to the intended use of the personally identifiable information or the scope of the personally identifiable information collected, of the program or technology is determined to be ineffective, the Chief Privacy Officer reserves the right to revoke approval of this Privacy Impact Assessment.



Approval Signature

Approved, signed copy on file with the U.S. Department of Homeland Security Privacy Office.

Roman Jankowski
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