



Privacy Impact Assessment
for the

U.S. Citizenship and Immigration Services Transformation

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Abstract

U.S. Citizenship and Immigration Services (USCIS) is transforming its business processes and systems to improve operational efficiency and customer service and to strengthen the security and integrity of the immigration system. As part of this effort, USCIS is amending its regulations and modifying its data collection practices to eventually convert all benefit requests to electronic submissions and to transition internal paper processes to an electronic environment. These regulatory and data collection changes will improve the consistency and timeliness of immigration benefit adjudications, support identity management, promote customer service, and manage national security and benefit risks. This PIA will address how the changes in regulations and collections of information, pursuant to the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501-3521 (2009), will permit USCIS to shift to a transformed electronic environment and further the implementation of the Fair Information Practice Principles (FIPPs).

Introduction

U.S. Citizenship and Immigration Services (USCIS) receives approximately six million immigration benefit requests each year, which are comprised of more than fifty types of applications and petitions. Until recently, USCIS has used a paper process to verify the identity of applicants, adjudicate benefit requests, and share information with other government agencies to identify possible criminals and terrorists. USCIS currently uses separate electronic systems to accept electronically filed cases, manage workflow, and track the many paper and electronic records about an individual. Even with these electronic systems, most of the adjudicative process is confined to the use and maintenance of paper files. Because these paper processes are less efficient than electronic processes, USCIS has begun transforming its business processes to a comprehensive online and electronic environment.

The Transformed Environment

USCIS is engaged in an enterprise-wide effort to improve customer service, increase efficiency for processing benefits, better identify risks and fraud, and create enhanced individual access and audit controls. USCIS's new operating environment will employ online accounts such as those successfully used by many private sector organizations. Applicants, petitioners, and their attorneys and accredited representatives will be able to access individual online accounts. These online accounts will help applicants and their representatives access specific requirements for desired benefits, file for benefits, track the status of open benefit requests, schedule appointments, change their addresses and contact information, and receive notices and notifications regarding their cases. Individuals will also be able to submit evidence and other supporting documentation electronically. Once an individual provides biographic information in one benefit request, the system will use that information to pre-populate any future benefit requests. This will ease the burden on an individual so that he or she will not have to repeatedly enter the same information for future benefit requests.

USCIS is creating a wholly electronic environment that will encompass the entire immigration lifecycle with USCIS, unlike the current processes that often focus on each individual benefit request through the use of labor intensive paper processes and multiple systems. USCIS is developing new



automated case management tools to perform background checks in other systems, assist managers in assigning and reviewing work, and provide USCIS authorized employees with a comprehensive view of an individual's immigration history. USCIS's new electronic environment will facilitate and expedite information collection, reduce fraudulent activity, and result in more consistent and efficient decisions.

In order to strengthen the security and integrity of the immigration system, the new electronic environment will identify potential national security, criminality, fraud and other risks by analyzing and sharing information used to verify identity and eligibility for various immigration benefits. USCIS will be able to determine eligibility using a more complete picture of an alien's immigration history by analyzing information across benefit requests, thus identifying individuals who may be involved in fraudulent, criminal, or other activities that may pose a security threat to the United States and who are otherwise ineligible for immigration benefits. For example, an applicant's marital history in an application being adjudicated may differ from the information in another pending benefit request or existing agency file. These tools will assist USCIS by automatically bringing relevant information to the attention of USCIS personnel, which will reduce the need to manually check other files and systems.

Through the transformation effort, USCIS will authorize the appropriate sharing of information with partner components of DHS, such as U.S. Customs and Border Protection (CBP) and U.S. Immigration and Customs Enforcement (ICE), in a secure environment that better protects against unauthorized uses and disclosures. This approach will also facilitate the authorized sharing of information with partner agencies, such as the Department of State (DOS) and the Department of Justice (DOJ). The sharing of information will occur through electronic transmission and storage, which is more efficient from a time and cost perspective and more secure than the physical movement of paper files.

Regulatory Changes

In order for USCIS to transform its operations to an electronic environment, USCIS must amend its regulations. DHS and USCIS are promulgating the regulations "Immigration Benefits Business Transformation, Increment I" (August 29, 2011, 76 FR 53764) to make it possible for USCIS to transition to an electronic environment. The regulations will assist USCIS transform its operations by removing references which require USCIS to use a paper process or inhibit the use of electronic systems to receive and process benefit requests. Specific changes in the regulations include:

Permitting electronic communications between USCIS and the parties:

Routine service between USCIS and the public was constrained by regulations to postal mail addressed to the affected party and his or her attorney or representative of record at his or her last known address. DHS is amending the regulations to permit USCIS to use electronic means of communication and post updates and other relevant information to the party's online account, if so requested by the party.

Removing form titles and number references and adding filing definitions:

While USCIS will continue to accept paper submission of most benefit requests, it will phase out references to mandatory use of specific forms for specific purposes in the regulations. By mandating the use of specific form numbers in the regulations, USCIS reduces its ability to modify business processes to accept filing procedures in an electronic environment. Form names and numbers will continue to exist for reference purposes, but they will not be specifically referenced in the regulations. As USCIS progresses



in the implementation of the online environment, electronic versions of forms and digital images of supporting documents will largely replace paper forms and documents for adjudication and records retention purposes.

Removing references to position titles or replacing position titles with appropriate DHS titles:

Wherever possible, DHS is removing references to official position titles used within DHS or used in the past by the former Immigration and Naturalization Service (INS). By removing those titles and position descriptions, DHS will have the operational flexibility required to facilitate adjudication in an electronic environment. Where a position title is necessary, DHS is replacing legacy position titles with the appropriate DHS title. For example, DHS is replacing obsolete references to the Attorney General and substituting them with the Secretary of Homeland Security where appropriate.

Replacing “Service” with more specific component names and removing references to particular USCIS offices:

The definition of “Service” in the newly designated 8 CFR § 1.2 is being amended to refer to DHS generally or to the specific component of DHS – USCIS, CBP, and ICE, as appropriate. Where the section pertains to an action that may have been taken by INS, or a function that is in the purview of or shared with another component, the term “the Service” is retained or inserted. Thus, “the Service” in 8 CFR may refer to any immigration-related component of DHS, including USCIS, CBP, and ICE. Remaining references to the former Immigration and Naturalization Service and the acronym INS are replaced by the proper terms.

Removing information about procedures for filing and internal processing of benefit requests:

Some parts of the regulations include details of the internal processing and handling of benefit requests or describe the submission of paper forms. Administrative filing requirements, locations, and procedures will not be prescribed in regulations but will be outlined in more flexible methods of conveying instructions. This modification will not change eligibility criteria or evidentiary standards. These details are not essential to the regulations, do not add substantive requirements or impose limitations, and unnecessarily burden the text of the regulations. To the extent that this information is required to be published pursuant to 5 U.S.C. § 552(a)(1)(A) and (B), DHS will publish an organization and functions rule in the administrative practices and procedures portion of 8 CFR part 2. DHS is removing such provisions from the regulations as they are subject to change with the implementation of the new electronic filing environment and technological improvements in internal processing. Information pertaining to any changes made in USCIS filing procedures and internal processes are more appropriate for inclusion within field manuals and other instructional materials that USCIS can readily revise and describe in more detail.

Removing obsolete and expired regulatory provisions and correcting and updating provisions affected by statutory changes:

DHS is removing regulatory provisions and citations that have expired because of statutory lapses or self-executing time limits or that have become obsolete due to previous regulatory changes. DHS is also making non-discretionary corrections to provisions affected by statutory amendments or extensions of time. DHS is adding new fees to the USCIS fee regulations as required by recent legislation. Effective



August 13, 2010, Public Law 111-230 imposes additional fees on certain H-1B and L-1 nonimmigrants. 124 Stat. 2485 (Aug. 13, 2010); New 8 CFR § 103.7(b)(1)(v).

Revising or reorganizing sections or paragraphs for clarity and consistency and removing duplicative information:

DHS is reorganizing 8 CFR Part 1 (Definitions) and 8 CFR Part 103 (Immigration Benefits, Biometric Requirements, Availability of Records) without substantive change. The reorganization of these sections does not introduce new obligations, requirements, or procedures. The reorganization is designed to simplify and rearrange existing regulatory requirements in a manner which is easier for the public to identify and understand. This rulemaking also removes regulatory provisions which repeat statutory and other regulatory information or which restate filing information that USCIS routinely includes in its form instructions. None of the changes constitute a substantive change in the law. DHS is also reorganizing other parts of 8 CFR without substantive change. DHS intends, in the recodification of these regulations, to conform to the understood policy, intent, and purpose of the original regulations, with such amendments and corrections as will remove ambiguities, contradictions, and other imperfections. This rule organizes 8 CFR part 103 into four subparts: Subpart A—Applying for Benefits, Surety Bonds, Fees; Subpart B—Biometric Requirements; Subpart C—Reserved; and Subpart D—Availability of Records.

Paperwork Reduction Act Information Collection Changes

As USCIS transforms its operations, it will begin collecting benefit requests through the new online system. In accordance with the Paperwork Reduction Act of 1995 (PRA), USCIS will provide the general public and federal agencies with notice that USCIS is submitting the new information collection requests to the Office of Management and Budget (OMB). As part of this process, the public will have an opportunity to review and comment on the new collection process. As each phase of the new online system is implemented, DHS will announce each benefit that has been converted to the new system, as well as whether the new system will be the sole filing option available. If the option of filing a paper form will remain available for a particular benefit, DHS will also announce whether the filing option will apply for all or some of the applicants for that benefit. In general, the transformed environment will follow the immigration “lifecycle” to first include non-immigrant benefits and proceeding eventually to applications for naturalization.

Before the new information collections are developed, USCIS will review the information collected for each benefit request to ensure the data collected is required for that benefit. By removing unnecessary data and adding data that is routinely required but not currently requested, USCIS will more efficiently process the benefit requests in the transformed environment.

Pursuant to Section 222 of the Homeland Security Act of 2002, this PIA will address how the changes in regulations and collections of information will permit USCIS to shift to a transformed electronic environment and further the implementation of the Fair Information Practice Principles (FIPPs). As USCIS develops this transformed environment, USCIS will publish new PIAs and Systems of Records Notices (SORN) to address specific features of the new systems.



Fair Information Practice Principles

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

In response to this obligation, the DHS Privacy Office developed a set of FIPPs from the underlying concepts of the Privacy Act to encompass the full breadth and diversity of the information and interactions of DHS. The FIPPs account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure.

DHS conducts PIAs on both programs and information technology systems, pursuant to the E-Government Act of 2002, Public Law 107-347, 116 Stat. 2899 Section 208 and the Homeland Security Act of 2002, Public Law 107-296, 116 Stat. 2135 Section 222. Given that USCIS's transformation initiative is an ongoing program rather than a particular information technology system, this PIA is conducted as it relates to the DHS implementation of FIPPs. Therefore, this PIA examines the privacy impact of USCIS's transformation operations in accordance to FIPPs, of which its eight principles are described below.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of PII. Technologies or systems using PII must be described in a System of Records Notice (SORN) and PIA, as appropriate. There should be no system the existence of which is a secret.

USCIS's paper process does not provide comprehensive access to records, the ability to instantly submit a benefit request, or any insight to an application's status in the adjudication process. Individuals receive notices and notifications through the mail and must often wait before being able to determine the status of pending benefit requests. A central goal in the USCIS transformation effort is to increase the transparency of USCIS's operations. The regulatory and information collection changes described in this PIA provide the public with transparency to the changes in USCIS operations. Individuals will always be presented with a Privacy Act Statement as required by 5 U.S.C. § 552a(e)(3) before submitting any information, which will provide them with a basic overview of the uses, dissemination, and authority for the collection of data and direct them to the appropriate SORNs. Individuals will be informed that the information they provide through the online system will be used to determine their eligibility for the requested benefit and may be shared with other parties in conformity with the appropriate systems of records notices. Additionally, as part of the transformation effort, USCIS will publish new SORNs and PIAs with specific details about the new online system.

In the transformed environment, individuals and their accredited representatives will be able to view the status of their pending benefit requests by logging in to the online system. As the system develops, USCIS will provide guidance to assist individuals with properly completing a benefit request.



USCIS will send out notices and notifications to individuals according to their preferences (email, SMS text messages, or automated voice calls), as a benefit request moves through the adjudication process, and will notify individuals when more information is needed or an interview has been scheduled. With greater access to their information, individuals will find less need to submit Freedom of Information Act (FOIA) or Privacy Act (PA) requests for their immigration files. Such a change will ultimately assist USCIS to streamline the processing of future FOIA/PA requests.

USCIS is committed to working with interested members of the public in developing an environment that provides the best service. USCIS has hosted a series of listening sessions and webinars with participants representing customers, attorneys, and community-based organizations. The purpose of these listening sessions was to inform USCIS about the benefits and challenges of moving to an electronic environment. These sessions were held in Baltimore, MD; Cleveland, OH; Los Angeles, CA; Orlando, FL; Seattle, WA; and Washington, DC. Each session reviewed Form I-539, Application to Extend/Change Nonimmigrant Status, provided an interactive demonstration, and focused on creating and managing an online account and e-filing a benefit request. USCIS will continue its public outreach campaign to incorporate the interests of the public in the transformation effort.

2. Principle of Individual Participation

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

USCIS's transformed environment will provide greater individual participation in the benefit request process. By amending DHS regulations and information collections, USCIS will be able to provide an online system that interacts directly with individuals.

The transformed environment will allow individuals to go online to submit benefit requests, respond to requests for evidence, monitor the status of their cases, add or terminate representation by an attorney or accredited representative, and manage the method by which they receive notices and notifications (email, SMS text message, or automated voice calls). Using an online system allows USCIS and individuals to communicate quickly and interact outside of traditional business hours. The online environment will also assist individuals with filling out multiple benefit requests by reusing data that has previously been provided, if appropriate and enable individuals to view a previously submitted benefit request without having to file a FOIA/PA request. In addition, USCIS will, at the time it denies a benefit, provide an individual with notice of the denial and information about how to appeal the denial.

USCIS is committed to working with interested members of the public in developing an environment that provides the best customer service. As USCIS develops the transformed environment, members of the public will be invited to preview certain aspects of the system.

3. Principle of Purpose Specification

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



Information provided by the individual will be used for the new purposes of creating and maintaining online accounts and pre-populating future benefit requests. This is consistent with existing legal authority and will assist the individual in simplifying the application process. The primary legal authority supporting the collection of the information provided to USCIS is the Immigration and Nationality Act of 1952, Public Law No. 82-414, as amended (INA), section 101, 8 U.S.C. § 1101 et seq. The regulations and PRA information collection changes mentioned in this PIA pave the way for DHS and USCIS to begin collecting information through the transformed online environment. The Government Paperwork Elimination Act (GPEA), Public Law 105-277, tit. XVII, section 1703, 112 Stat. 2681, 2681-749 (Oct. 21, 1998), 44 U.S.C. § 3504 note, provides that, when possible, federal agencies use electronic forms, electronic filing, and electronic submissions to conduct agency business with the public. GPEA also establishes the means for the use and acceptance of electronic signatures. Executive Order 13571, 75 Fed. Reg. 24339 (Apr. 27, 2011), requires federal agencies to develop plans to streamline delivery of services and improve customer service by exploring lower-cost, self-service options accessed by the Internet or mobile phone and improved processes that deliver services faster and more responsively, reducing the overall need for customer inquiries and complaints. The changes to regulations mentioned in this PIA will significantly enhance the ability of USCIS to fully implement GPEA and Executive Order 13571.

The Homeland Security Act of 2002, Public Law 107-296, section 102, 116 Stat. 2135 (Nov. 25, 2002), 6 U.S.C. § 112, and the INA, section 103, 8 U.S.C. § 1103, charge the Secretary of Homeland Security with administration and enforcement of the immigration and naturalization laws. DHS implemented an electronic signature provision for immigration benefit filings with USCIS in 2003, Electronic Signature on Applications for Immigration and Naturalization Benefits, 68 FR 23010 (April 29, 2003). These regulatory and PRA information collection changes are being implemented by the Secretary under the broad authority to administer the Department of Homeland Security and the authorities provided under the Homeland Security Act of 2002, the immigration and nationality laws, and other delegated authority.

4. Principle of Data Minimization

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

Minimization of the collected data is a primary concern in establishing the requirements for the transformed online benefit request process. The regulatory changes mentioned in this PIA reflect the emphasis USCIS places on collecting information in an agile environment that can adapt to changes in business needs. The PRA information collection changes will reflect the minimal amount of information necessary for processing a requested benefit.

USCIS completed a detailed process to review what information is needed when determining eligibility for a requested benefit. USCIS also reviewed all the data elements that are collected on every available form. This review provided an understanding of common data elements across all form types and allowed for the grouping of information into categories for the benefit requests. The resulting



groupings of data include: 1) the applicant; 2) the benefit being requested; 3) the eligibility for that benefit; 4) the other people included in the benefit request; 5) the signatures; and 6) the preparers and representatives who assisted with the benefit request process.

All benefit requests processed in the transformed environment will use these standard sections. Sections 1 and 5 are the same for all benefit requests; sections 2 and 3 vary for the type of benefit; section 4 only needs to be completed if multiple people are part of the benefit request; and section 6 only needs to be completed if there is a representative or preparer assisting in the benefit request process. When filing online using the draft benefit request process, a “wizard” will assist in completing the benefit request.

With the sections of the benefit request standardized, USCIS undertook a review of each data element that was being requested. The information was evaluated against multiple criteria to ensure that the information was necessary to the benefit being sought, increased processing efficiency, provided better customer service, and ensured the benefit was provided to only those who were qualified to receive it. Data that did not meet these requirements were eliminated from the benefit request. As an example, Social Security Numbers will no longer be requested for many benefit types. The transformed environment will also collect the minimal amount of information necessary to establish an online account with USCIS, requiring only a valid email address, password, challenge questions, and answers.

USCIS is in the process of determining the business needs for varying types of data retained in the transformed environment and is in negotiations with NARA to determine the appropriate retention schedules for the information. Certain information, such as a copy of an individual’s benefit request, will be retained as a permanent record due to its historical value. At scheduled intervals, that information will be retired to NARA. Other data that is temporary in nature will be destroyed according to the approved retention schedule. As an example, USCIS anticipates routinely destroying abandoned drafted or partially drafted benefit requests if they have not been submitted to USCIS within 30 days of initiation. This will prevent USCIS from processing or handling PII before the individual has submitted it.

5. Principle of Use Limitation

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

The regulatory and information collection changes mentioned in this PIA will allow USCIS to better control the use of information provided by individuals by restricting access to information in the online system. Roles assigned to USCIS personnel will restrict their ability to access data to only that data which is required for them to perform their assigned duties. Furthermore, required training and guidance will reinforce the use limitations placed on the information.

Information provided by an individual to USCIS will be used to determine eligibility for the requested benefit, which will include law enforcement, national security, and other background checks. These checks will require USCIS to share information provided by individuals with other federal agencies as permitted by the Privacy Act of 1974, 5 U.S.C § 552a, and the appropriate routine uses in the applicable SORNs.



DHS will also make this information available to other federal, state, local, and tribal agencies for national security, law enforcement, and other routine uses as stated in the applicable SORNs. DHS has Memoranda of Understanding (MOUs) in place with external agencies to support the routine sharing of information. When sharing information with parties outside of DHS, the same specifications related to security that are in place for USCIS and DHS apply to the outside entity. Access to records is governed by “need-to-know” criteria that demand the receiving entity to demonstrate the mission-related need for the data before access is granted. The reason for the access, an intended use consistent with the receiving agency’s purpose, the justification for collecting the data, and an acknowledgement that the receiving agency will not share the information without USCIS’s permission are also concerns that are included in the MOU or ad hoc authorization.

6. Principle of Data Quality and Integrity

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

The regulatory and information collection changes mentioned above will provide more timely and accurate data through the transformed online environment. Applicants for benefits and their attorneys or accredited representatives will be able to log into the online system at any time to directly provide updated account or contact information or view previously submitted information. USCIS will be able to contact these individuals directly to request more information in the manner preferred by the individual (email, SMS text message, or automated voice call). All these measures ensure that applicants for benefits or their attorneys or accredited representatives are better informed about what information has been provided to USCIS and what information is needed to adjudicate the benefit request.

By using an online system, USCIS will be able to provide contextual guidance and tips to an individual while he or she completes a benefit request. If the benefit requires some original documents or other evidence, the applicant for a benefit may scan, upload, and attach the documents to the benefit request. Attorneys and accredited representatives will also benefit from guidance that is tailored for their use of the system.

Once USCIS has received the information, the transformed environment will permit USCIS to better verify the information provided by the individual by automatically performing the required national security, law enforcement, and eligibility checks. Furthermore, the transformed environment will be better able to find past benefit requests submitted by the individual or non-obvious patterns of fraud or other national security risks that were previously difficult to detect. The results of these checks and searches will be presented to USCIS personnel to assist them with determining the individual’s eligibility for the requested benefit.

7. Principle of Security

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



USCIS is taking several steps to ensure that the transformed environment is a secure one. All connections to the online system will be encrypted. Individuals will be given instructions about how to create an account with a strong password and challenge questions or a second-factor authentication method are used to mitigate the risk of breach by an unauthorized party. USCIS will instruct applicants for benefits and their attorneys or accredited representatives to secure their account information to ensure confidentiality. Furthermore, USCIS warning banners will notify the individual that divulging confidential information to others presents the risk that others may alter their benefit requests to their detriment or abuse the PII contained therein.

USCIS is developing a comprehensive System Security Plan for the transformed environment. In accordance with the National Institute of Standards and Technology controls and Office of Management and Budget requirements, USCIS staff and/or administrators of the transformed environment will conduct a self-assessment of privacy policies and security controls, at least annually, to determine the extent to which policies and controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting privacy and security requirements.

8. Principle of Accountability and Auditing

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

By removing the regulatory and PRA information collection barriers to the transformed environment, USCIS will be able to better control access to and auditing of PII. All internal users of the transformed electronic environment, including federal employees and contractors, must complete annual privacy training to ensure they properly handle PII. USCIS personnel, contractors, and vendors with security responsibilities (e.g., Information System Security Officers or system administrators) receive initial specialized training and thereafter, annual refresher training that is specific to their security and privacy responsibilities. Training for the transformed environment will incorporate simulated events into incident response training to facilitate an effective response by personnel in crisis situations. USCIS maintains training records, including names and positions, types of training received, and costs of training. IT security and privacy awareness training are completed before IT accounts are authorized and annually thereafter.

By migrating to the transformed electronic environment, USCIS will be able to keep better audit logs of all access to an individual's record. Periodic audits will take place to ensure the system is being used properly. USCIS employees will have access to different views and content based on their roles and access privileges. An employee's access to an individual's online account will be similarly restricted based on employee's role and profile.

Conclusion

Amending these regulations and changing the PRA information collections will allow USCIS to transition to this electronic environment. The transformation to this electronic environment will enable USCIS to continue evolving as an innovative and agile organization that best utilizes its resources to serve the public, manage its workload, identify risks and fraud, and ensure cost-effective and consistent results.



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Approval Signature Page

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