



Privacy Impact Assessment
for the

Enterprise Service Bus 2 (ESB 2)

DHS/USCIS/PIA-008(a)

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Abstract

U.S. Citizenship and Immigration Services (USCIS) operates the Enterprise Service Bus (ESB 2) to facilitate real-time information sharing between enterprise applications internally within USCIS, other Department of Homeland Security (DHS) components, and externally with other agencies and partners. ESB 2 implements a communication system between software applications, which interact in a service-oriented architecture. ESB 2 allows USCIS to integrate modern systems with legacy systems in order to exchange information in a readable format. USCIS is updating this Privacy Impact Assessment (PIA) to evaluate the privacy risks and mitigations associated with the collection, use, and dissemination of personally identifiable information (PII) by the integrated subsystem services hosted by ESB 2.

Overview

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States. USCIS is responsible for processing petitions, applications, and other requests for immigration-related benefits. To fulfill its mission, USCIS may share information with or receive information from other USCIS, DHS, and non-DHS systems. USCIS uses systems which were implemented at different points in time for different purposes using a variety of underlying technology infrastructures (including legacy mainframe database systems, Oracle-based server systems, and newer service-oriented systems), but are required to communicate with each other.

USCIS operates the Enterprise Service Bus (ESB 2) in an effort to connect and share data from different operating systems. Serving as a conduit, ESB 2 replaces all direct contact with applications and operates between the applications, so that all data exchanges take place through the ESB 2. ESB 2 assists with the seamless and accurate exchange of information from disparate systems by facilitating the transfer of data. The transfer of information is invoked by the end source systems. When exchanging data from one system to another, the ESB 2 translates the message from one system format to another format to enable effective and secure synchronization and integration of data. To achieve system interoperability, both systems must refer to a common information exchange reference model. As a backend system, the ESB 2 reconciles different operating systems and standards in order to address interoperability complexities and challenges. USCIS personnel access ESB 2 in a developer or administer role. End users do not have access to ESB 2.

The ESB 2 is the foundation infrastructure that hosts and supports USCIS business services and provides the service-oriented architecture platform for USCIS. The ESB 2 enables real-time information sharing between enterprise applications within USCIS, DHS, external government



agencies, and other authorized partners with little or no modifications needed to the systems being integrated. USCIS ESB 2 facilitates data synchronization and integration of the following services:

- **American Association of Motor Vehicle Administrators (AAMVA) Hub Service (AHS)** facilitates communication between the USCIS Verification Information System (VIS), which supports the E-Verify¹ and SAVE² programs, and AAMVNet.
- **Customer Profile Management System Support Service (CPMS-SS)** facilitates communication between Application Support Center (ASC) Biometric Capture stations, USCIS Benefits Biometric Support System (BBSS),³ the Office of Biometric Identity Management (OBIM) Identification System (IDENT),⁴ the Federal Bureau of Investigation (FBI) National Name Check Program,⁵ and the Department of Defense (DoD) Automated Biometric Identification System (ABIS)⁶ with the CPMS.⁷ CPMS-SS also facilitates the exchange of document information required by all case management systems in USCIS to produce benefit documents as well as notices sent to applicants.
- **Enterprise Document Management System Support Service (ESS)** facilitates communication between USCIS Central Index System (CIS),⁸ U.S. Immigration and Customs Enforcement (ICE) Office of the Principal Legal Advisor (OPLA) Case Management System (OCMS),⁹ and USCIS Freedom of Information Act/Privacy Act Information Processing System (FIPS)¹⁰ with the Enterprise Document Management System (EDMS).¹¹
- **Lockbox Intake Service (LIS)**¹² facilitates communication between the Lockbox to the respective USCIS case management systems (e.g., Computer Linked Application

¹ See DHS/USCIS/PIA-030(c) E-Verify Ride, available at www.dhs.gov/privacy.

² See DHS/USCIS/PIA-006 Systematic Alien Verification for Entitlements (SAVE) Program, available at www.dhs.gov/privacy.

³ BBSS is an enterprise system designed to transmit demographic and fingerprint/biometric data that is collected at the USCIS ASCs for subsequent submission to the FBI.

⁴ See DHS/NPPD/PIA-002 Automated Biometric Identification System (IDENT), available at www.dhs.gov/privacy.

⁵ The FBI Name Check is a name-based search of the FBI's Central Records System (CRS) and Universal Index (UNI). See DOJ/FBI-002 Central Records System (CRS), 66 FR 29994 (June 4, 2001).

⁶ Department of Defense Detainee Biometric Information System, 72 FR 14534 (Mar. 28, 2007).

⁷ See DHS/USCIS/PIA-060 Customer Profile Management System, available at www.dhs.gov/privacy.

⁸ See DHS/USCIS/PIA-009 Central Index System (CIS), available at www.dhs.gov/privacy.

⁹ See DHS/ICE/PIA-036 OPLA Case Management System, available at www.dhs.gov/privacy.

¹⁰ See DHS/USCIS/PIA-038 FOIA/PA Information Processing System (FIPS), available at www.dhs.gov/privacy.

¹¹ See DHS/USCIS/PIA-003 Integrated Digitization Document Management Program (IDDMP), available at www.dhs.gov/privacy.

¹² Lockbox is a facility, operated by the Department of Treasury, which allows USCIS to receive benefit request forms more quickly and process fee payments more efficiently and securely.



Information Management System (CLAIMS 3) and CLAIMS 4) for initial benefit forms.¹³

- **Person Centric Query Service (PCQS)** allows users to submit a single query and view all permissible transactions involving an immigrant or nonimmigrant across multiple DHS and external systems.¹⁴
- **Verification Service** allows authorized USCIS personnel the ability to search for verification information against multiple sources via one operation. The Verification Service extracts verification information from USCIS CLAIMS 4, ICE Student and Exchange Visitor Information System (SEVIS),¹⁵ and U.S. Customs and Border Protection (CBP) TECS.¹⁶
- **Adoption Orchestration Services (AOS)** facilitates communication between the USCIS Adoption Case Management System¹⁷ and to the Department of State (DOS) Consular Consolidated Database (CCD).¹⁸
- **Transformation Support Services (TSS)** provides an interface between USCIS legacy systems and external partner agencies' (e.g., ICE, CBP, FBI, and OBIM) systems.¹⁹
- **Visa Support Services Project (VSSP)** is a service that collects biometrics and limited biographic information from participating USCIS Application Support Centers on behalf of several countries that require biometric and biographic data as part of their visa issuance process for visitors to their respective countries.²⁰
- **Validation Instrument for Business Enterprises (VIBE)** assists with validating the business operations of companies and organizations looking to employ foreign workers for non-immigrant visa in the United States.²¹ VIBE communicates with ESB 2 Common Service, Enterprise Citizenship and Immigrations Services Centralized Operational

¹³ See DHS/USCIS/PIA-061 Benefit Request Intake Process, available at www.dhs.gov/privacy.

¹⁴ See DHS/USCIS/PIA-010 Person Centric Query Service, available at www.dhs.gov/privacy.

¹⁵ See DHS/ICE/PIA-001 Student Exchange Visitor Information System (SEVIS), available at www.dhs.gov/privacy.

¹⁶ See DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing (TECS) National SAR Initiative, available at www.dhs.gov/privacy.

¹⁷ See DHS/USCIS/PIA-007(b) Domestically Filed Inter-country Adoptions Applications and Petitions, available at www.dhs.gov/privacy.

¹⁸ See DOS Consular Consolidated Database (CCD) PIA, available at <https://www.state.gov/documents/organization/242316.pdf>.

¹⁹ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

²⁰ See DHS/USCIS/PIA-048(a) USCIS International Biometric Processing Services, available at www.dhs.gov/privacy.

²¹ See DHS/USCIS/PIA-044 VIBE and subsequent updates, available at www.dhs.gov/privacy.



Repository (eCISCOR),²² CLAIMS 3,²³ VIS,²⁴ and Dun and Bradstreet (D&B) systems.²⁵

- **Refugee Asylum Support Service (RASS)** facilitates the refugee vetting through the automated sharing of information between the DOS, CBP, USCIS, and other vetting agencies.²⁶ RASS interfaces with DOS Worldwide Refugee Admissions Processing System (WRAPS)²⁷ for ingestion into the Case and Activity Management for International Operations (CAMINO).²⁸ USCIS RASS also passes the refugee information derived from WRAP to U.S. Customs and Border Protection (CBP) Automated Targeting System (ATS).²⁹ ATS in turn transmits data to partner agencies in the law enforcement and intelligence community, such as National Counter Terrorism Center (NCTC).
- **Central Index System Support System (CIN-SS)** is an ESB middleware service that facilitates data transactions between CIS and National File Tracking System (NFTS)³⁰, as well as between Refugees, Asylum, and Parole System (RAPS) and NFTS.³¹ ESB2 CIN-SS performs a number of service mediation and protocol intermediation operations to allow the CIS Mainframe to communicate with NFTS.

As ESB 2 matures, the ESB 2 may host additional services, as well as reuse existing services already deployed on the ESB 2. Please see the Appendices to this PIA for more information regarding the collection, use, storage, and dissemination of information between disparate systems.

The ESB 2 contains a set of common services, which include auditing, handling error, and security. The ESB 2 enables USCIS to implement greater security and privacy measures into the data usage and transfer process by providing a centralized mechanism for authenticating and authorizing service access and interface access. ESB 2 employs auditing measures to prevent inappropriate dissemination of data. DHS security specifications require auditing capabilities that

²² See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

²³ See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at www.dhs.gov/privacy.

²⁴ VIS is the information technology system that enables USCIS to operate SAVE and E-Verify.

²⁵ Dun & Bradstreet, Inc. is a company that provides commercial data, analytics, and insights for businesses.

²⁶ See DHS/USCIS/PIA-068 Refugee Case Processing and Security Vetting, available at www.dhs.gov/privacy.

²⁷ WRAPS is the DOS case management database used for all refugee applicants processed for resettlement consideration to the United States. For more information, see the WRAPS PIA and SORN, available at <https://2001-2009.state.gov/documents/organization/101146.pdf>. Refugee Processing Center (RPC), operated by DOS contractors, is the central data repository for all overseas and domestic resettlement operations. The RPC manages the WRAPS database.

²⁸ See DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), available at www.dhs.gov/privacy.

²⁹ See DHS/CBP/PIA-006(e) Automated Targeting System, available at www.dhs.gov/privacy.

³⁰ See DHS/USCIS/PIA-032 National File Tracking System (NFTS), available at www.dhs.gov/privacy.

³¹ RAPS is the case management system for applications for asylum pursuant to Section 208. See DHS/USCIS/PIA-027 USCIS Asylum Division, available at www.dhs.gov/privacy.



log the activity of each transaction in order to reduce the possibility of inappropriate dissemination of information.

Section 1.0 Authorities and Other Requirements

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

USCIS collects and uses information under the authority of the Immigration and Nationality Act (INA). Specifically, 8 U.S.C. sec. 1103 charges the Secretary of Homeland Security with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens.

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

The USCIS ESB 2 is the foundation infrastructure that enables real-time information sharing between enterprise applications within USCIS, DHS, external government agencies, and partners. The source-system SORNs described in the attached Appendices cover the collection, use, maintenance, and dissemination of information by the subsystem services.

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

Yes. ESB 2 is a major application and includes integrated subsystems as within its accreditation boundary. The security plan for ESB 2 was completed in August 2013, and was accepted into the Ongoing Authorization program. Ongoing Authorization requires ESB 2 to be reviewed on a monthly basis and maintain its security posture to maintain its Authority to Operate (ATO).

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

No. ESB 2 does not retain any operational information from a query. ESB 2 transmits data and immediately deletes all information after the information is sent to the receiving system. Thus, ESB 2 does not require a NARA-approved records retention schedule. However, the systems from which ESB 2 transmits information may have NARA-approved retention schedules. Please see the appendices for source system retention schedules.



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

No. The provisions of the PRA do not apply to ESB 2.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

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

USCIS ESB 2 is an intermediary system meaning that it connects different source systems together to enable communication among them. The ESB 2 hosts services that individually serve as a messenger and transforms the message into a format that the receiving operating system can interpret and ingest. ESB 2 does not maintain or store any operational data once the information is transmitted. Usually data is in queue until it is processed. Please see the Appendices of this PIA for a complete list of data elements transmitted and exchanged by each ESB 2 service.

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

USCIS ESB 2 is an intermediary system meaning that it connects different source systems together to enable communication between them. The appendices detail each source system.

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

No. Information from commercial sources or publicly available data is not used by ESB 2. However, EBS 2 may facilitate the transmission of information from commercial sources or publicly available data to the source systems that collects and uses the information. For example, VIBE collects commercially available data from Dun & Bradstreet (D&B).³² D&B maintains a global database of companies and professional contacts. D&B shares this information with VIBE through the ESB interface. VIBE compares the information provided on petitions against the D&B data.

³² See DHS/USCIS/PIA-044 VIBE, available at www.dhs.gov/privacy.



2.4 Discuss how accuracy of the data is ensured.

ESB 2 depends on the accuracy and quality of information from each source system. ESB 2 ensures the accuracy of the data by collecting the information directly from the source systems. For data that may be transferred through the ESB 2, the data is queried from the underlying systems and is delivered “as is” with the exception of reformatting to standardize the representation of the data. Any checks for accuracy of the data are accomplished at the originating site, and are out of scope of the ESB 2 or the services the ESB 2 controls. The ESB 2 cannot and does not provide any assurance that the data it delivers is accurate. ESB 2 transforms data from one format to another using open standard tools like XSLT and Tibco adapters.³³

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk of exposing personal information in audit data.

Mitigation: ESB 2 mitigates this risk by not retaining operational data in the audit log files. Auditing is a fundamental security principle that provides the ability to track the activities of a user or system that may access information maintained within a system. Audit trails track the identity of each subject attempting to access a system, the time and date of access, and the time of log off. Data in the audit log files contain general transactional information that is helpful in identifying the transaction and user.

Privacy Risk: There is a risk that inaccurate information is transferred to the end systems from the ESB 2 services.

Mitigation: This risk is not mitigated. ESB 2 depends on the accuracy and quality of information from each source system. ESB 2 does not change data “in route” to the receiving system other than to provide standardized formatting of the data, such as date and time formatting.

Section 3.0 Uses of the Information

The following questions require a clear description of the project’s use of information.

3.1 Describe how and why the project uses the information.

The purpose of the ESB 2 is to support the integration of legacy and different operating systems. The ESB 2 services enable the seamless integration, communication, and exchange of data between systems. Please see the Appendices of this PIA which describes how and why the ESB 2 services may transfer information. Additionally, the associated source system and project

³³ These tools are used to transform information from one format to other format. XSLT stands for Extensible Stylesheet Language Transformations and is utilized to convert different XML documents, or HTML script into other formats such as PDF. Tibco is a private corporation that develops data transfer applications that allows for transfer between incompatible software.



PIAs also describe the data transport, system connection, or information access for a particular ESB 2 hosted service.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

No. The USCIS ESB 2 does not perform any queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly or any data analysis.

3.3 Are there other components with assigned roles and responsibilities within the system?

No. There are no day-to-day users of ESB 2.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that improper identity and access controls may expose information to malicious or un-authorized users.

Mitigation: ESB 2 mitigates this risk by protecting the data for role-based access control of services controlled and managed by the ESB 2 with encryption and access control. Only ESB 2 administrators will have access to this data and the most critical portion of this data, the password, is stored using irreversible encryption.

The data delivered by the ESB 2 is protected by numerous security controls. ESB 2's security controls ensure that the data from the underlying connected systems remains intact from when it is first queried from the original underlying source system until it is delivered to the consuming application or end user. The primary method of this control is the use of secure socket layer (SSL) processing between all components that do not reside on the same physical machine. SSL processing ensures that data may not be altered during communications. The SSL mechanisms involved are all Federal Information Processing Standard 140-2 compliant per DHS policy.³⁴

ESB 2 audit logs will only be reviewed if there is suspicious activity that leads to a need to review. The ESB 2 audit review is performed by IT Security if they determine that there is suspicious activity or that there may have been a security breach. Any reconstruction of events is a manual process performed by IT Security. The audit logs are only accessible to IT Security upon request, and ESB 2 administrators only for archival and storage management purposes.

³⁴ <https://csrc.nist.gov/projects/cryptographic-module-validation-program/standards>.



Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

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

ESB 2 does not collect information directly from individuals. Each USCIS source system provides notice through a PIA and SORN, which are available on the DHS Privacy Office website and/or published in the federal register. USCIS is providing notice of ESB's use of information through this PIA. The Appendices of this PIA describe the specific notice provided by each system.

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

ESB 2 does not collect information directly from the individual. The agency or program that collected the information may provide the individual with the opportunity to consent, decline to provide information, or opt out of the source system.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that an individual may not be aware that information stored in different operating systems may be integrated and exchanged using ESB 2.

Mitigation: This risk is mitigated by publishing this PIA. USCIS also published separate PIAs for each source system that describe how the ESB 2 is used to share information with other systems. The collecting agency provides notice at the point of collection that the information may be shared with other federal, state, local, and foreign government agencies and authorized organizations in accordance with routine uses described in the associated published SORNs. External agencies may also provide notice through published Privacy Notices, SORNs, or PIAs.

Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

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

USCIS ESB 2 does not save data from any of the systems that are connecting through ESB 2. USCIS ESB 2 service does not maintain/retain any data once the data is exchanged. Usually the data is retained in memory (queue) only for a few seconds for processing.



5.2 Privacy Impact Analysis: Related to Retention

There is no risk related to retention of data because ESB 2 does not save data.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other federal, state and local government and private sector entities.

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

USCIS ESB 2 shares information from USCIS with other federal agencies for the purpose of processing applications, requests, or petitions under the INA. USCIS ESB 2 may also share information with federal, state, local, and foreign government agencies and authorized organizations in accordance with approved routine uses, as described in the source system's associated published SORNs. The ESB 2 services may share USCIS information and records with outside entities, either pursuant to regulation or through specific agreements.

Department of Defense

Through the CPMS-SS, USCIS sends benefit requestor biographic and biometric information to the DoD to conduct fingerprint checks on specific refugee and asylum filing types. All DoD Fingerprint Check requests, responses, and queries flow through CPMS-SS which connects DoD ABIS³⁵ and CPMS.³⁶

Department of Justice, Federal Bureau of Investigation

Through the CPMS-SS, USCIS sends benefit requestor information to the FBI to conduct name checks. All FBI Name Check requests, responses, and queries flow through the ESB 2; there is no direct connection between the FBI National Name Check system³⁷ and CPMS.

³⁵ Department of Defense Detainee Biometric Information System, 72 FR 14534 (Mar. 28, 2007).

³⁶ See DHS/USCIS/PIA-060 Customer Profile Management Service (CPMS), available at www.dhs.gov/privacy.

³⁷ DOJ/FBI-002 Central Records System (CRS), 66 FR 29994 (June 4, 2001).



Department of Justice, Executive Office for Immigration Review (EOIR)

Attorneys and other EOIR practitioners are required to register to practice before EOIR's immigration courts in the Case Access System (CASE).³⁸ USCIS TSS sends updates to the attorney and legal accredited representation list to CASE.³⁹

Department of State (DoS)

PCQS, AOS, RASS, and TSS facilitate the sharing of benefit requestor information with DOS. PCQS provides DOS users direct access to USCIS systems. AOS transmits intercountry adoption data to DOS CCD.⁴⁰ RASS retrieves refugee case information from DOS WRAPS.⁴¹

Department of the Treasury (TRE)

USCIS ELIS receives payment confirmation after the customer is redirected to pay.gov. Through TSS, the Collection Information Repository (CIR) provides settlement data related to the payment collection for USCIS ELIS cases.⁴²

U.S. Postal Service (USPS)

USCIS ELIS sends the address provided by the benefit seeker and receives USPS standardized address.

American Association of Motor Vehicle Administrators (AAMVA)

AAMVA Hub Service (AHS) facilitates the secure connection between USCIS Verification Information System and AAMVA in support of the Systematic Alien Verification for Entitlements (SAVE)⁴³ and Records and Information from Department of Motor Vehicles for E-Verify (RIDE) initiative.⁴⁴

³⁸ The Case Access System (CASE) is the Information Resource Management System that provides the Executive Office for Immigration Review (EOIR) with case tracking and management information, office automation, Internet/Intranet, and automated legal research services. More information is available at <https://www.justice.gov/eoir/major-information-systems>.

³⁹ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

⁴⁰ See DOS CCD PIA (July 17, 2015), available at https://foia.state.gov/docs/pia/consularconsolidateddatabase_ccd.pdf.

⁴¹ <https://2001-2009.state.gov/documents/organization/101146.pdf>.

⁴² See The Bureau of the Fiscal Service Collections Information Repository (CIR) Privacy Impact Assessment (February 13, 2017), available at <https://www.fiscal.treasury.gov/fsreports/rpt/fspia/cirpia.pdf>.

⁴³ See DHS/USCIS/PIA-006(b) Systematic Alien Verification for Entitlements Program, available at www.dhs.gov/privacy.

⁴⁴ See DHS/USCIS/PIA-030(c) E-Verify RIDE, available at www.dhs.gov/privacy.



International Partner Agencies

USCIS ASCs collect applicant biometric and biographic information on behalf of international partner governmental agencies. VSSP transmits the individual's information to the partner agencies.⁴⁵

Please see the Appendices of this PIA to learn more about the External Sharing practices of each ESB 2 service.

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

Before transferring information, USCIS verifies that the sharing is for a purpose compatible with the original purpose for which USCIS collected the information.

Department of Defense

Sharing USCIS data with DoD is compatible with the purpose of CPMS because USCIS is required to conduct background and security checks to identify threats to national security and public safety posed by those seeking immigration benefits. The external sharing of biographic information with DoD is covered under routine use Q of the forthcoming DHS/USCIS-002 Immigration Biometric and Background Check, which allows USCIS to share information with DoD to verify the applicant's eligibility for the benefit being sought.⁴⁶

Department of Justice Federal Bureau of Investigation

Sharing USCIS data with the FBI is compatible with the purpose of the system because USCIS is required to conduct background and security checks to identify threats to national security and public safety posed by those seeking immigration benefits. The external sharing of biographic and biometric information with the FBI is covered under Routine Use O of the forthcoming DHS/USCIS-002 Immigration Biometric and Background Check, which allows USCIS to share information in CPMS with the FBI to verify the applicant's eligibility for the benefit being sought.⁴⁷

⁴⁵ See DHS/USCIS/PIA-048 USCIS International Biometric Processing Services, *available at* www.dhs.gov/privacy.

⁴⁶ The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners. The new consolidated SORN will be available at www.dhs.gov/privacy.

⁴⁷ The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners. The new consolidated SORN will be available at www.dhs.gov/privacy.



Department of State

Sharing USCIS data with DOS is compatible with the purpose of the system because the DOS mission, like USCIS, includes ensuring visits and immigration to the United States are lawful as dictated by the INA. USCIS shares information with DOS as permitted under the following routine uses:

- Routine Use O of DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking permits the sharing of information with the Department of State in the processing of petitions or applications for benefits under the Immigration and Nationality Act, and all other immigration and nationality laws including treaties and reciprocal agreements; or when the Department of State requires information to consider and/or provide an informed response to a request for information from a foreign, international, or intergovernmental agency, authority, or organization about an alien or an enforcement operation with transnational implications.⁴⁸
- Routine Use P of the DHS/USCIS-002 Immigration Biometric and Background Check permits the sharing of information with the Department of State in the processing of petitions or applications for benefits under the Immigration and Nationality Act, and all other immigration and nationality laws including treaties and reciprocal agreements.⁴⁹
- Routine Use I in DHS/USCIS-005 Intercountry Adoptions permits information sharing with the Department of State in the processing of petitions or applications for benefits under the Immigration and Nationality Act, and all other immigration and nationality laws including treaties and reciprocal agreements.⁵⁰
- Routine Use I of the DHS/USCIS-007 Benefits Information System permits the sharing of information with the Department of State for the purpose of assisting in the processing of petitions or applications for benefits under the Immigration and Nationality Act, and all other immigration and nationality laws including treaties and reciprocal agreements.⁵¹
- Routine Use K of DHS/USCIS-010 Asylum Information and Pre-Screening permits the

⁴⁸ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

⁴⁹ The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners. The new consolidated SORN will be available at www.dhs.gov/privacy.

⁵⁰ DHS/USCIS-005 Intercountry Adoptions, 81 FR 78614 (Nov. 8, 2016).

⁵¹ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



sharing of information with the Department of State for the purpose of assisting in the processing of petitions or applications for benefits under the Immigration and Nationality Act, and all other immigration and nationality laws including treaties and reciprocal agreements.⁵²

- Routine Use H of DHS/USCIS-017 - Refugee Case Processing and Security Screening Information System of Records permits the sharing of information with to the Department of State when necessary to accomplish refugee case processing.⁵³

Department of the Treasury

Sharing USCIS data with the Department of Treasury is compatible with the purpose of the system because the Treasury, and its contractors, collects fee payments from individuals on behalf of USCIS. Routine Use Z of the DHS/USCIS-007 Benefits Information System permits sharing information with Treasury to perform initial processing of benefit requests and to accept and resolve payment and any related issues.⁵⁴

U.S. Postal Service

No SORN is required for this external sharing because the data is not maintained in a system of records under the Privacy Act.

American Association of Motor Vehicle Administrators (AAMVA)

Sharing USCIS data with AAMVA is compatible with the purpose of the system because the law permits employers to verify the information from a driver's license, permit, or state-issued ID card if the state has established a memorandum of agreement (MOA) with DHS USCIS to allow verification of this information. AAMVAnet is a conduit that provides access to biographical information collected by state Motor Vehicle Agencies (MVA). The American Association of Motor Vehicle Administrators (AAMVA) operates AAMVAnet. However, the data in the system is owned by the organization that had the original authority to collect the data.⁵⁵

International Partner Agencies

USCIS temporarily retains information collected on behalf of a partner country for only as long as it takes to successfully transmit the information to the partner country. While temporarily retained, USCIS does not retrieve the records using a unique personal identifier. USCIS transfers the biographic information and biometric capture to the partner country immediately after collection. USCIS deletes the information from ESB 2 after the partner country provides

⁵² DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 7478, (Nov. 30, 2015).

⁵³ DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, 81 FR 72075 (Oct. 19, 2016).

⁵⁴ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

⁵⁵ DHS/USCIS-011 E-Verify Program System of Records, 79 FR 46852 (Aug. 11, 2014) and DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 81 FR 78619, (Nov. 8, 2016).



confirmation of the successful transfer of the information. Therefore, no SORN is required to cover this collection.

6.3 Does the project place limitations on re-dissemination?

Yes. A Memorandum of Understanding/Agreement (MOU/A) exists between DHS and all recipient external organizations that places limitations on re-dissemination of information. External organizations may only share information under the MOU when the recipient has an official need, in accordance with the terms of the MOU/A, and allowed by applicable privacy and confidentiality statutes. Additionally, the MOU/A clarifies the authority for External Organizations and DHS to share immigration and naturalization records and the basic mechanisms established to protect this data.

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

ESB 2 services shares information with external systems and maintains audit and transactional logs of all data sent through the ESB 2.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that USCIS may potentially disclose data for a purpose that is not compatible with the original purpose for collection.

Mitigation: USCIS mitigates this risk by ensuring the information sharing is compatible with the purpose for collection prior to disclosing any information. USCIS reviews the routine uses in the applicable SORNs to verify the compatibility of an information exchange prior to disclosing data. DHS has MOUs in place with external agencies to ensure that there are formal procedures in place to secure and protect biographic and biometric information. The agreements between DHS and external entities fully outline responsibilities of the parties, security standards, and limits of use of the information, including re-dissemination, prior to information sharing. As discussed above, ESB 2 maintains a record of disclosure of information in accordance with the associated routine use or information sharing agreement. Records are kept as system audit trail logs, which are maintained to identify transactions performed by users. In addition, USCIS ensures through the MOU process that the external agencies have policies, procedures, and training in place to ensure that information is not inappropriately disseminated.

Privacy Risk: There is a risk that data shared externally from a source system via ESB 2 may be inaccurate.

Mitigation: ESB 2 depends on the accuracy and quality of information from each source system. ESB 2 ensures the accuracy of the data by collecting the information directly from the source systems. For data that may be transferred through the ESB 2, the data is queried from the



underlying systems and is delivered “as is” with the exception of reformatting to standardize the representation of the data.

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

An individual may seek access to his or her USCIS records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Only U.S. citizens and lawful permanent residents may file a Privacy Act request. Account holders not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS record, he or she may mail the request to the following address:

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

Some information requested may be exempt from disclosure under the Privacy Act or FOIA because information may contain law enforcement sensitive information, the release of which could possibly compromise ongoing criminal investigations. Further information about Privacy Act and FOIA requests for USCIS records is available at <http://www.uscis.gov>.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

U.S. citizens and lawful permanent residents, as well as other persons with records covered by JRA, are afforded the ability to correct information by filing a Privacy Act Amendment request under the Privacy Act. U.S. citizens, lawful permanent residents, and persons covered by the JRA should submit requests to contest or amend information contained in USCIS systems. Individuals may direct all requests to contest or amend information to the USCIS FOIA/PA Office. Individuals must state clearly and concisely in the redress request the information being contested, the reason for contesting it, the proposed amendment, and clearly mark the envelope “Privacy Act Amendment.” This would only apply to amendment of USCIS-held information. Persons not covered by the Privacy Act are not able to amend their records through FOIA. Should a non-U.S.



person find inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

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

USCIS notifies individuals of the procedures for correcting their information in this PIA, source system PIAs, Privacy Notices, and through the USCIS website. Specifically, the SORNs listed in the Appendices provide individuals with guidance regarding the procedures for correcting information. Privacy Notices, including notice of an individual's right to correct information, are also contained on the instructions to immigration forms published by USCIS.

7.4 Privacy Impact Analysis: Related to Redress

There is no risk associated with redress. USCIS provides individuals with access to their records that are not subject to exemptions when requested through a FOIA or Privacy Act request. Individuals who are United States citizens or lawful permanent residents may submit a Privacy Act request to contest or amend information. Any person, regardless of immigration status can come to a USCIS Field Office to update his or her records.

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

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

USCIS ensures that practices stated in this PIA comply with internal USCIS policies, including the USCIS privacy policies, standard operating procedures (SOP), orientation and training, rules of behavior, and auditing and accountability. The data stored in ESB 2 for auditing and logging purposes includes three (3) types of logs. These logs enhance privacy and information sharing by enabling senior leadership to be able to see whether information is being accessed and used appropriately and in accordance with all applicable information law and policy. The first is a generic log, which contains the ESB 2 process that consists of processing the event, the time of the event, and a generic description of the event. The second is a login log, which contains audit information of when a person has initiated a login session for a set of services on the ESB 2. It contains the ESB 2 process including processing the event, the time of the event, and the login ID of the user signing onto the system. The third is a query/access log, which contains information specific to those systems that may have been accessed via a service. The audit contains the time of the access, the login ID under which the access occurred, the systems which were accessed, and



the systems that responded to the access request. This data is only accessible to IT Security and can be queried by login ID and time.

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

All USCIS employees and contractors are required to complete annual privacy and computer security awareness training to ensure their understanding of proper handling and securing of PII. Privacy training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements/Notices). The computer security awareness training examines appropriate technical, physical, and administrative control measures to safeguard information.

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

Both contractors and government personnel may have access to the ESB 2. Security procedures are in place in accordance with the system security plan and the USCIS systems lifecycle methodology (SLM). This plan is the primary reference that documents system security responsibilities, policies, controls, and procedures. Access to the ESB 2 is controlled via the Active Directory to authenticate users. The ESB 2 uses a personal identity verification (PIV) card to authenticate the user. Once authenticated, the ESB 2 retrieves the roles for the connection to enforce appropriate service access. System Administrators assign roles pre-approved by their supervisors so that users have appropriate access to perform their particular job functions. Assignment of roles is provided on an official use only basis. The system may only grant roles that have been predetermined by the implementation of the ESB system. There exists one role for each of the underlying legacy systems and services. Auditing for user management tasks (e.g., add user, delete user, grant role, revoke role) is performed by the ESB system when any user information (including the addition or deletion of roles) is updated. This auditing is implemented in accordance with DHS policies and procedures as documented in the DHS Sensitive Systems Policy Directive 4300A and the DHS 4300A Sensitive Systems Handbook.

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

USCIS has a formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for the system must go through the USCIS change control process and must be approved by the proper authorities of this process, such as the DHS Headquarters (including Office of General Counsel, Civil Rights and Civil Liberties, Office



of Intelligence and Analysis, and the Privacy Office), USCIS Privacy Officer, Chief of Information Security Officer, Office of the Chief Counsel, and the respective Program Office.

Responsible Officials

Donald K. Hawkins
Privacy Officer
U.S. Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

Original, signed copy on file with the DHS Privacy Office

Philip S. Kaplan
Chief Privacy Officer
Department of Homeland Security



APPENDIX A

AAMVA Hub Service (AHS) Subsystem

Background:

The AAMVA Hub Service (AHS) Subsystem facilitates the secure connection between USCIS Verification Information System (VIS) and American Association on Motor Vehicle Administrators (AAMVA) in support of the Systematic Alien Verification for Entitlements (SAVE)⁵⁶ and Records and Information from Department of Motor Vehicles for E-Verify (RIDE) initiative.⁵⁷

The SAVE Photo Matching Tool is available for a participating Motor Vehicle Association (MVA) to access the SAVE system through the American Association of Motor Vehicle Administrators Network (AAMVAnet). The Photo Matching Tool is a process whereby an MVA employee submits a query to SAVE for verification of an individual's status using the USCIS-issued Permanent Resident Card or Employment Authorization Card that an applicant presents to MVA personnel.

RIDE seeks to increase the effectiveness of E-Verify by automating motor vehicle document (e.g., driver's license, driver's permit, or state-issued ID card) verification between state MVA and E-Verify employers. The secure connection provided by the AAMVAnet allows for the verification of the motor vehicle document.⁵⁸

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

An MVA employee is able to submit a query to SAVE for verification of an applicant's status using the USCIS-issued identification card that an individual presents to MVA personnel. SAVE retrieves and displays the individual's information, including a photograph from CPMS to allow the MVA employee to determine if the information and photograph displayed in SAVE via CPMS matches the information the applicant presented to MVA personnel.⁵⁹

E-Verify compares the information entered by the employer against information contained in the MVA database to authenticate the identification document. Information shared through the AHS may include first name, last name, date of birth, document type, state of issuance, expiration date, and document number.

⁵⁶ See DHS/USCIS/PIA-006(b) Systematic Alien Verification for Entitlements Program, available at www.dhs.gov/privacy.

⁵⁷ See DHS/USCIS/PIA-030(c) E-Verify RIDE, available at www.dhs.gov/privacy.

⁵⁸ The American Association of Motor Vehicle Administrators Network Service (AAMVAnet) is a conduit that provides access to biographical information collected by state Motor Vehicle Agencies (MVA). The American Association of Motor Vehicle Administrators (AAMVA) operates AAMVAnet. However, the data in the system is owned by the organization that had the original authority to collect the data.

⁵⁹ See DHS/USCIS/PIA-060 Customer Profile Management System, available at www.dhs.gov/privacy.



Category of Individuals Affected:

The AHS supports SAVE and RIDE. Employers use E-Verify to verify the employment eligibility of new employees. The MVA uses SAVE to verify a USCIS-issued identification card.

Information Sharing:

AHS provide an electronic interface to VIS and AAMVA.

Applicable System of Records Notice:

E-Verify⁶⁰ and SAVE⁶¹ System of Records Notices cover the collection and use of information to verify the information from a driver's license, permit, or state issued ID card if the State has established a MOA with DHS USCIS to allow verification of this information.

Retention:

AHS service does not maintain/retain any data. Usually the data is temporarily in queue (a few seconds) for processing. Once successfully or unsuccessfully processed, the data is no longer available in AHS.

⁶⁰ DHS-USCIS-011 E-Verify Program System of Records, 79 FR 46852 (Aug. 11, 2014).

⁶¹ DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 81 FR 78619 (Nov. 8, 2016).



APPENDIX B

Enterprise Document Management System Support Service (ESS)

Background:

The USCIS Enterprise Document Management System Support Service (ESS) facilitates the transmission of data between EDMS and multiple sub systems. ESS facilitates the data exchange between EDMS and Central Index System (CIS),⁶² U.S. Immigration and Customs Enforcement (ICE) Office of the Principal Legal Advisor (OPLA) Case Management System (OCMS),⁶³ and USCIS Freedom of Information Act/Privacy Act Information Processing System (FIPS).⁶⁴

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

The EDMS Support Services includes the:

- **Digitization Notification Service** allows client applications to communicate one Alien Number for an operation and provides the client application with response codes that detail the success or failure of the Digitization Notification Request.
- **Metadata Update Service** transforms the data provided by CIS into the format required by EDMS and places that message on a queue on the ESB 2. The Metadata Update Service also removes any incomplete/invalid dates, (dates with a 00 month, day or year) received by CIS before sending to EDMS.
- **A-File Delivery Service** Data is transmitted securely between OPLA and FIPS and the ESB using Simple Object Access Protocol (SOAP)⁶⁵/ Hypertext Transfer Protocol Secure (HTTPS)⁶⁶ and Web Services Security (WS-Security) Headers via this service. HTTPS encrypts the transport and provides server authentication, while usage of the WS-Security Headers will provide client authentication.

Category of Individuals Affected:

Applicants and petitioners seeking immigrant and non-immigrant benefits to include: lawful permanent residents, naturalized citizens, United States border crossers, aliens who illegally entered the United States, aliens who have been issued employment authorization documents,

⁶² See DHS/USCIS/PIA-009 Central Index System (CIS) and subsequent updates, *available at* www.dhs.gov/privacy.

⁶³ See DHS/ICE/PIA-036 OPLA Case Management System, *available at* www.dhs.gov/privacy.

⁶⁴ See DHS/USCIS/PIA-038 FOIA/PA Information Processing System (FIPS), *available at* www.dhs.gov/privacy.

⁶⁵ SAOP is a protocol specification for exchanging structured information in the implementation of web services in computer networks.

⁶⁶ HTTPS is an adaptation of the HTTP for secure communication over a computer network.



individuals who petitioned for benefits on behalf of family members, and other individuals subject to the provisions of the Immigration and Nationality Act (INA).

Information Sharing:

ESS facilitates the data exchange between EDMS and USCIS CIS, ICE OPLA, and USCIS FIPS.

Applicable System of Records Notice:

- DHS/USCIS-001 Alien File, Index, and National File Tracking System,⁶⁷ which covers the collection, use, and maintenance of benefit requests forms and supplemental evidence, as well as data in CIS and EDMS; and
- DHS/ALL-001 Department of Homeland Security (DHS) Freedom of Information Act (FOIA) and Privacy Act (PA) Record System,⁶⁸ which covers the processing of record access requests and administrative appeals under the FOIA, as well as access, notification, and amendment requests and administrative appeals under the Privacy Act.

Retention:

EDMS System Support Service does not maintain/retain any data. Usually the data is temporarily in queue (a few seconds) for processing. Once successfully or unsuccessfully processed, the data is no longer available in EDMS System Support Service.

⁶⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

⁶⁸ DHS/ALL-001 Department of Homeland Security (DHS) Freedom of Information Act (FOIA) and Privacy Act (PA) Record System, 79 FR 6609 (Feb. 4, 2014).



APPENDIX C

CPMS Support Service (CPMS SS)

Background:

USCIS ESB 2 Customer Profile Management System (CPMS) supports the information sharing exchange of biometric data collected at the Application Support Centers for biometric processing of immigration applicants.⁶⁹ This also includes data from produced immigration benefit cards to USCIS government partners (e.g., Office of Biometric Identity Management (OBIM)).

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

- **Application Support Center (ASC) Biometric Capture Stations:** The data will be a one way transfer of captured 10-print biometric and biographic data of immigration petitioners that will be sent to the ESB 2 for business processing across various DHS systems such as USCIS CPMS, OBIM IDENT, and USCIS ELIS.⁷⁰
- **Office of Biometric Identity Management (OBIM) Automated Biometric Identification System (IDENT):** Through CPMS SS, CPMS also sends fingerprints, photographs, and limited biographic information to the OBIM IDENT.⁷¹

Category of Individuals Affected:

Most individuals who have filed benefit requests for themselves or on the behalf of others (i.e., benefit requestors and beneficiaries) are subject to background, identity, and security checks to ensure eligibility for the requested benefit and to ensure that they do not pose a threat to public safety or to the national security of the United States. Other individuals in connection with immigration benefit requests or other requests may also be subject to certain background, identity, and security checks.

Information Sharing:

USCIS uses CPMS Support Service to share biometric data collected at the ASC for biometric processing of immigration applicants. This data is shared across various DHS systems such as USCIS CPMS, OBIM IDENT, and USCIS ELIS. In addition, CPMS SS facilitates communications with DOJ FBI Name Check⁷² and DoD ABIS.⁷³

⁶⁹ See DHS/USCIS/PIA-002 Customer Profile Management System, available at www.dhs.gov/privacy.

⁷⁰ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

⁷¹ See DHS/NPPD/PIA-002 Automated Biometric Identification System (IDENT), available at www.dhs.gov/privacy.

⁷² DOJ/FBI-002 Central Records System (CRS), 66 FR 29994 (June 4, 2001).

⁷³ Department of Defense Detainee Biometric Information System, 72 FR 14534 (Mar. 28, 2007).



Associated System of Records Notice:

The collection, use, maintenance, and dissemination of information is covered under the forthcoming Immigration Biometric and Background Check System of Records, which covers the collection, use, and storage of biometric and biographic data for background checks and its results. The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners. The new consolidated SORN will be available at www.dhs.gov/privacy.

Retention:

CPMS service does not maintain/retain any data. Usually the data is in memory (queue) for few seconds for processing. Sometimes the data remain in the queue for 24-48 hours; this is in the case if data is not picked up by the processing system due to some issue experienced by the recipient. Once the data is picked up it is not retained on the ESB 2 side.



APPENDIX D

USCIS ESB 2 Lockbox Intake Service (LIS)

Background:

Lockbox facilities are operated by a specialized contractor authorized by the Department of Treasury (Treasury). This contractor manages the intake of USCIS benefit applications and the collection of associated fees submitted directly by mail. It provides the mechanisms to capture information electronically from USCIS benefit request forms, deposit associated fees, move the information to USCIS systems via a system interface, and generate acceptance and rejection notices to applicants. The contractor is also responsible for preparing the application-related files in accordance with USCIS guidance and sending the files to the next processing site (i.e., Service Center). The contractor does not approve or deny benefit request forms received by the USCIS Lockbox.

The Lockbox is the primary data entry point for the intake of immigrant and non-immigrant filings. The forms are scanned and electronically parsed and then picked up by the ESB 2 LIS. The service accepts data representing the benefit request forms as well as the receipting and remittance data for the benefit request forms. LIS then distributes this data to the appropriate USCIS case management system.⁷⁴

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

The Lockbox scans an image of the benefit request form and supporting documentation into an electronic format. Lockbox personnel perform data entry on an as needed basis for forms that do not convert properly in electronic format. Lockbox personnel compare the physical benefit request form and payment against the data in electronic format and make corrections as needed. Once the physical form is converted into electronic format, it is sent to the appropriate case management system. Files are transmitted via the LIS and are also ingested into the EDMS Receipt File Repository.

Category of Individuals Affected:

The information collected as part of the benefit request intake and receipt process is provided by the benefit requestor, accredited representative, form preparer, or interpreter on the completed benefit request form and from supplemental documentation

Information Sharing:

USCIS LIS receives immigration applications and petitions along with supporting documents from the JP Morgan Chase (JPMC) Lockbox Service Provider via the USCIS ESB 2.

⁷⁴ See DHS/USCIS/PIA-061 Benefit Request Intake Process, available at www.dhs.gov/privacy.



The application data is transmitted to USCIS backend systems (CLAIMS 3,⁷⁵ CLAIMS 4,⁷⁶ and ELIS⁷⁷).

Applicable System of Records Notice:

The following SORNs cover the collection, maintenance, and use of the information of the benefit request intake and receipt process:

- Alien File, Index, and National File Tracking System,⁷⁸ which covers the collection, use, and maintenance of benefit requests forms and supplemental evidence; and
- Benefits Information System,⁷⁹ which covers the collection and use of immigrant and nonimmigrant benefit request forms, decisional data, and associated fees for adjudication.

Retention:

LIS service does not maintain/retain any data. Usually the data is temporarily in queue (a few seconds) for processing. Once successfully or unsuccessfully processed, the data is no longer available in LIS.

⁷⁵ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

⁷⁶ See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at www.dhs.gov/privacy.

⁷⁷ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

⁷⁸ DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

⁷⁹ DHS-USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



APPENDIX E

Person Centric Query Service (PCQS)

Background:

Person Centric Query Service (PCQS) allows a user or system to submit a single query for all transactions involving an immigrant across USCIS systems, DHS systems, external agency systems, and private sector systems, and returns a consolidated and correlated view of the immigrant's past interactions with the agency. PCQS presents a single access point and eliminates the need to access individual systems separately. PCQS does not store data. PCQS retrieves and temporarily displays information from connected systems in a consolidated, read-only format for the user.⁸⁰

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

PCQS temporarily displays read-only information from underlying, connected IT systems. The information temporarily displayed from each system varies.

Category of Individuals Affected:

PCQS is used to provide a consolidated real-time view of records from multiple systems. PCQS allows users to temporarily display real-time data related to an individual such as immigration status, biometric information, and associated biographic information for the purposes of national security, law enforcement, adjudication of applications or petitions for immigration benefits and border management.

Information Sharing:

PCQS retrieves and temporarily displays information from connected systems, which include USCIS systems, DHS systems and external agency systems. These systems include:

USCIS Systems

- Aliens Change of Address Card (AR-11) System;⁸¹
- Benefits Biometrics Support System (BBSS);⁸²
- Central Index System Agent (CIS);⁸³

⁸⁰ See DHS/USCIS/PIA-010 Person Centric Query Service, available at www.dhs.gov/privacy.

⁸¹ See DHS/USCIS/PIA-018 Alien Change of Address Card (AR-11), available at www.dhs.gov/privacy.

⁸² See DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS) available at www.dhs.gov/privacy.

⁸³ See DHS/USCIS/PIA-009 Central Index System (CIS), available at www.dhs.gov/privacy.



- Computer Linked Application Information Management System (CLAIMS 3);⁸⁴
- Computer Linked Application Information Management System (CLAIMS 4);⁸⁵
- Customer Profile Management System (CPMS);⁸⁶
- Electronic Immigration System 2 (ELIS2);⁸⁷
- Enterprise Citizenship and Information Services Centralized Operational Repository – CLAIMS 3 (eCISCOR-C3LAN);⁸⁸
- Enterprise Citizenship and Information Services Centralized Operational Repository– Central Index System Agent (eCISCOR-CIS);
- Enterprise Citizenship and Information Services Centralized Operational Repository – Checkers (eCISCOR-Checkers);
- Enterprise Citizenship and Information Services Centralized Operational Repository (eCISCOR-RNACS);
- FBI Fingerprint and Name Check System(FD258);⁸⁹
- National File Tracking System (NFTS);⁹⁰
- USCIS Checkers;⁹¹
- Marriage Fraud Amendment System (MFAS);⁹² and
- Validation Instrument Business Entity (VIBE).⁹³

⁸⁴ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

⁸⁵ See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at www.dhs.gov/privacy.

⁸⁶ See DHS/USCIS/PIA-060 Customer Profile Management System, available at www.dhs.gov/privacy.

⁸⁷ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

⁸⁸ See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

⁸⁹ See DHS/USCIS/PIA-033 Immigration Benefits Background Check Systems (IBBCS), available at www.dhs.gov/privacy.

⁹⁰ See DHS/USCIS/PIA-032 National File Tracking System (NFTS), available at www.dhs.gov/privacy.

⁹¹ See Forthcoming update to DHS/USCIS/PIA-027 USCIS Asylum Division, available at www.dhs.gov/privacy.

⁹² See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

⁹³ See DHS/USCIS/PIA-044 Validation Instrument for Business Enterprises (VIBE), available at www.dhs.gov/privacy.



DHS Systems

- DHS National Protection and Programs Directorate (NPPD), Office of Biometric Identity Management (OBIM) Automated Biometric Identification System (IDENT);⁹⁴
- Customs and Border Patrol (CBP) TECS;⁹⁵
- CBP Automated Targeting System – Passenger (ATS-P);⁹⁶
- CBP Arrival Departure Information System (ADIS);⁹⁷ and
- ICE Student and Exchange Visitor Information System (SEVIS).⁹⁸

External Systems

- Department of Justice (DOJ) Executive Office for Immigration Review (EOIR);⁹⁹
- Department of State (DOS) Consular Consolidated Database (CCD);¹⁰⁰ and
- American Association of Motor Vehicle Administrators (AAMVA) Network Service (AAMVAnet).¹⁰¹

Applicable System of Records Notice:

PCQS retrieves and temporarily displays data from other Privacy Act Systems of Record. The source system SORNs (described in the PCQS PIA Appendices) cover the data within PCQS.¹⁰²

Retention:

PCQS service does not maintain/retain any data. Usually the data is temporarily in queue (a few seconds) for processing. Once successfully or unsuccessfully processed, the data is no longer available in PCQS.

⁹⁴ See DHS/NPPD/PIA-002 Automated Biometric Identification System (IDENT), *available at* www.dhs.gov/privacy.

⁹⁵ See DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing (TECS) National SAR Initiative, *available at* www.dhs.gov/privacy.

⁹⁶ See DHS/CBP/PIA-006(b) Automated Targeting System (ATS) Update, *available at* www.dhs.gov/privacy.

⁹⁷ See DHS/CBP/PIA-024 Arrival and Departure Information System, *available at* www.dhs.gov/privacy.

⁹⁸ See DHS/ICE/PIA-001 Student Exchange Visitor Information System (SEVIS), *available at* www.dhs.gov/privacy.

⁹⁹ Justice/EOIR-001 Records and Management Information System, 66 FR 35458 (July 5, 2001).

¹⁰⁰ See DOS Consular Consolidated Database (CCD) PIA, *available at* <https://www.state.gov/documents/organization/242316.pdf>.

¹⁰¹ See DHS/USCIS/PIA-006(b) Systematic Alien Verification for Entitlements Program and DHS/USCIS/PIA-030(c) E-Verify RIDE, *available at* www.dhs.gov/privacy.

¹⁰² See DHS/USCIS/PIA-010 Person Centric Query Service, *available at* www.dhs.gov/privacy.



APPENDIX F

Verification Service Subsystem

Background:

The Verification Service Subsystem allows authorized USCIS personnel to search multiple sources for verification information via one operation. The systems and information searched are listed below. The unavailability of a certain subsystem does not impact the ability of the Verification Service to return verification information from other subsystems.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

The Verification Service Subsystem transmits PII and SPII data, such as: first name, last name, date of birth (DOB), Social Security number, naturalization number, passport number, and driver's license number for verification purposes. The following information is exchanged:

USCIS Computer Linked Application Information Management System (CLAIMS 4)¹⁰³

To verify an individual's Naturalization Status, the following data is communicated:

- First Name;
- Last Name;
- DOB;
- Naturalization number; and
- Social Security number.

USCIS Redesigned Naturalization Application Casework System (RNACS) via eCISCOR¹⁰⁴

To verify an individual's naturalization status, the following data is communicated:

- Naturalization Certificate;
- Alien Number;
- First Name;
- Last Name; and
- DOB.

¹⁰³ See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at www.dhs.gov/privacy.

¹⁰⁴ See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.



USCIS Central Index System (CIS),¹⁰⁵ Alien Number Verification module:

To verify an alien registration number, the following data is communicated:

- First Name;
- Last Name; and
- DOB.

USCIS Computer Linked Application Information Management System 3 (CLAIMS 3)¹⁰⁶

To verify a document number, the following data is communicated:

- Alien Number.

USCIS Checkers¹⁰⁷

To verify a document number against Checkers, the following data is communicated:

- Alien Number.

U.S. Immigration and Customs Enforcement (ICE) Student and Exchange Visitor Information System (SEVIS)¹⁰⁸

To verify an individual's student visa status, the following data is communicated:

- SEVIS ID.

U.S. Customs and Border Patrol (CBP) Electronic System for Travel Authorization (ESTA)

¹⁰⁹

To verify passport issuance, the following data is communicated:

- First Name;
- Last Name;
- DOB; and
- Passport Number.

¹⁰⁵ See DHS/USCIS/PIA-009(a) Central Index System (CIS), available at www.dhs.gov/privacy.

¹⁰⁶ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

¹⁰⁷ See DHS/USCIS/PIA-027(c) USCIS Asylum Division, available at www.dhs.gov/privacy.

¹⁰⁸ See DHS/ICE/PIA-001 Student Exchange Visitor Information System (SEVIS), available at www.dhs.gov/privacy.

¹⁰⁹ See DHS/CBP/PIA-007 Electronic System for Travel Authorization, available at www.dhs.gov/privacy.



CBP Arrival and Departure Information System (ADIS)¹¹⁰

To verify a document number, the following data is communicated:

- Document Number;
- Country of Issuance;
- Event Category; and
- Event Count.

American Association of Motor Vehicle Administrators Network Service (AAMVAnet)¹¹¹ To verify the validity of a driver's license, the following data is communicated:

- First Name;
- Last Name;
- DOB;
- Driver's License Number;
- Permit Number;
- Document Expiration Date; and
- Document Jurisdiction.

Category of Individuals Affected:

USCIS uses the Verification Service to verify information provided by individuals who interact with USCIS. This includes but not limited to benefit applicants, petitioners, etc.

Information Sharing:

The Verification Service shares information between systems mentioned below:

- USCIS CLAIMS 4;
- USCIS RNACS via eCISCOR;
- USCIS CLAIMS 3;
- USCIS Checkers;
- USCIS CIS;

¹¹⁰ See DHS/CBP/PIA-024 Arrival and Departure Information System, available at www.dhs.gov/privacy.

¹¹¹ See DHS/USCIS/PIA-006(b) Systematic Alien Verification for Entitlements Program and DHS/USCIS/PIA-030(c) E-Verify RIDE, available at www.dhs.gov/privacy.



- CBP ESTA;
- CBP ADIS;
- ICE SEVIS; and
- AAMVAnet

Applicable System of Records Notice:

The information maintained and shared is covered under the following SORNs:

- Alien File, Index, and National File Tracking System¹¹² covers CIS, which serves as a DHS-wide index of key information for A-Files (whether paper or electronic). CIS contains information on individuals who interact with DHS. The system contains biographic information on those individuals which can be used to retrieve additional information from other systems. However, A-Files are not contained in CIS;
- Benefits Information System¹¹³ covers the collection and use of immigrant and nonimmigrant benefit request forms and decisional data in CLAIMS 3, CLAIMS 4, and RNACS (via eCISCOR).
- Asylum Information and Pre-Screening System¹¹⁴ covers the collection and use of benefit request forms and decisional data in Checkers.¹¹⁵
- E-Verify Program¹¹⁶ covers the collection and use of information to verify the information from a driver's license, permit, or state issued ID card if the state has established a MOA with USCIS to allow verification of this information with AAMVA.
- Systematic Alien Verification for Entitlements Program¹¹⁷ covers the collection and use of information to verify the information from a driver's license, permit, or state issued-ID card if the state has established a MOA with USCIS to allow verification of this information with AAMVA.
- Electronic System for Travel Authorization¹¹⁸ covers the collection and maintenance of individuals who want to travel to the United States under the Visa Waiver Program

¹¹² DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

¹¹³ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

¹¹⁴ DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (Nov. 30, 2015).

¹¹⁵ See DHS/USCIS/PIA-027 USCIS Asylum Division, available at www.dhs.gov/privacy.

¹¹⁶ DHS/USCIS-011 E-Verify Program System of Records, 79 FR 46852, (Aug. 11, 2014).

¹¹⁷ DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records, 81 FR 78619 (Nov. 8, 2016).

¹¹⁸ DHS/CBP-009 Electronic System for Travel Authorization (ESTA), 81 FR 60713 (Sept. 2, 2016).



(VWP), and to determine whether applicants are eligible to travel to and enter the United States under the VWP.

- Arrival and Departure Information System¹¹⁹ serve as the primary repository for tracking entry and exit data throughout the immigrant and non-immigrant pre-entry, entry, status management, and exit processes.
- Student and Exchange Visitor Information System¹²⁰ covers the tracking of certain nonimmigrants and their dependents during their stay in the U.S.

Retention:

The Verification Service does not maintain/retain any data. Usually the data is temporarily in queue (a few seconds) for processing. Once successfully or unsuccessfully processed, the data is no longer available in the Verification Service.

¹¹⁹ DHS/CBP-021 Arrival and Departure Information System (ADIS), 80 FR 72081 (Nov. 18, 2015).

¹²⁰ DHS/ICE-001 Student and Exchange Visitor Information System, 75 FR 412 (Jan. 5, 2010).



APPENDIX G

Adoption Orchestration Services (AOS)

Background:

Adoption Orchestration Services (AOS) facilitates the secure connection between the USCIS Adoption Case Management System (ACMS)¹²¹ and the Department of State (DOS) Consular Consolidated Database (CCD) in support of inter-country adoptions.¹²² USCIS adjudicators are able to electronically share intercountry adoption filings from ACMS to CCD through AOS. AOS reads the message from ACMS, transforms the data using the mappings defined in the ESB-AOS, and updates DOS CCD in a compatible format.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

The intercountry adoption information shared with DOS includes information captured on the intercountry adoption forms, supporting evidence, the home study, all Requests for Evidence (RFE), background check results, and approval and denial notices.

Category of Individuals Affected:

Intercountry Adoption filings include information on the prospective adoptive parents, adult household members, and adoptive beneficiaries.

Information Sharing:

AOS facilitates the secure connection between USCIS ACMS and the DOS CCD.

Applicable System of Records Notice:

The Intercountry Adoptions SORN covers the information collected during the intercountry adoptions process and sharing of information with DOS.¹²³

Retention:

AOS does not maintain/retain any data. Usually the data is in memory (queue) for few seconds for processing.

¹²¹ See DHS/USCIS/PIA-007(b) Domestically Filed Intercountry Adoptions Applications and Petitions, available at www.dhs.gov/privacy.

¹²² See DOS CCD PIA (July 17, 2015), available at https://foia.state.gov/docs/pia/consularconsolidateddatabase_ccd.pdf.

¹²³ DHS/USCIS-005 Inter-Country Adoptions Security, 81 FR 78614 (Nov. 8, 2016).



APPENDIX H

Transformation Support Services (TSS)

Background:

USCIS ESB 2 TSS provides interfaces between USCIS legacy systems, new USCIS systems, and external partner agencies' systems such as Immigration Customs and Enforcement (ICE), U.S. Customs and Border Patrol (CBP), and external partners.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

The type of information varies based on the specific system interface. The type of information exchanged includes name, date of birth, case status, receipt number, and Social Security number.

Category of Individuals Affected:

Individuals who electronically applied for immigration and non-immigration benefits with USCIS.

Information Sharing:

USCIS Systems

- **ATLAS** (not an acronym): USCIS ELIS sends name and date of birth to ATLAS¹²⁴ to conduct the CBP TECS checks.¹²⁵ ATLAS returns the results of the TECS check to ELIS and the response is stored in ELIS. ELIS also sends biographic and case data to ATLAS so ATLAS can conduct continuous vetting.
- **USCIS Central Index System (CIS)** is a repository of electronic data that summarizes the history of an immigrant. TSS sends case status to CIS from USCIS ELIS.¹²⁶
- **Computer Linked Application Information Management System (CLAIMS 3):** USCIS ELIS queries CLAIMS 3 by Alien Number to retrieve known aliases and add to the USCIS ELIS case.
- **Customer Profile Management System (CPMS)** retrieves press print and photo to include in the card production request sent to EPMS for the permanent resident card and

¹²⁴ See DHS/USCIS/PIA-013(a) Fraud Detection and National Security Data System (FDNS-DS), available at www.dhs.gov/privacy.

¹²⁵ The TECS Name Check query consists of a name-based search of a multi-agency database containing information from different federal agencies. The information in TECS includes records of known and suspected terrorists, sex offenders, people who are public safety risks and other individuals that may be of interest (e.g., individuals who have warrants issued against them, people involved in illegal gang activity, etc.) to the law enforcement community.

¹²⁶ See DHS/USCIS/PIA-009 Central Index System (CIS), available at www.dhs.gov/privacy.



employment authorization document production. USCIS ELIS queries CPMS by A-Number to retrieve known aliases and add to USCIS ELIS case.¹²⁷

- **USCIS Customer Relationship Interface System (CRIS)** provides USCIS applicants, petitioners, and benefit requestors with the status of pending applications and petitions for benefits and processing time information. TSS sends case status updates to CRIS.¹²⁸
- **USCIS Marriage Fraud Amendment System (MFAS)** is the legacy mainframe case tracking system designed to supplement the adjudication of petitions covered by the Immigration Marriage Fraud Act of 1986 (IMFA).¹²⁹ TSS sends case status updates for conditional residence to MFAS.¹³⁰
- **Enterprise Citizenship and Immigration Services Centralized Operational (eCISCOR)** pulls updated USCIS ELIS data using an Extract Transform Load (ETL) tool, once a day. eCISCOR stores a complete copy of ELIS data. eCISCOR is used as the source for generating reports.¹³¹
- **Enterprise Correspondence Handling Online (ECHO):** USCIS ELIS sends name and address to ECHO for the generation of editable notices, including resolution memos. USCIS ELIS receives confirmation of the notice generation and a .pdf copy of the notice that is stored in USCIS ELIS.
- **Enterprise Print Manger Service (EPMS):** USCIS ELIS sends standard notice, permanent resident card and employment authorization document production requests to EPMS. USCIS ELIS receives confirmation/ response of the card production and the notice production request. USCIS ELIS receives and stores a .pdf copy of the notice that is sent from EPMS.
- **National Appointment Scheduling Service (NASS):** USCIS ELIS sends name, address, and form type to NASS requesting the scheduling of an Application Support Center appointment, interview, and oath ceremony appointment.¹³² USCIS ELIS receives

¹²⁷ See DHS/USCIS/PIA-060 Customer Profile Management System, available at www.dhs.gov/privacy.

¹²⁸ See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

¹²⁹ See Public Law 99-639, which was passed in order to deter immigration-related marriage fraud. Its major provision stipulates that aliens deriving their immigrant status based on a marriage of less than two years are conditional immigrants. To remove their conditional status, the immigrants must apply at an USCIS Office during the 90-day period before their second-year anniversary of receiving conditional status. If the aliens cannot show that the marriage through which the status was obtained was and is a valid one, their conditional immigrant status may be terminated and they may become deportable.

¹³⁰ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

¹³¹ See DHS/USCIS/PIA-023 Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

¹³² See DHS/USCIS/PIA-057 National Appointment Scheduling System, available at www.dhs.gov/privacy.



confirmation of the scheduling appointment notice generation and a.pdf copy of the notice that is stored in USCIS ELIS.

- **National File Tracking System (NFTS):** USCIS ELIS queries NFTS for file location and stores the current File Control Office location of the A-file in USCIS ELIS.¹³³ USCIS ELIS sends a file transfer request to NFTS. USCIS ELIS sends the receipt number to NFTS. NFTS stores the USCIS ELIS receipt number, so NFTS users will know there is a case file in USCIS ELIS.

Other DHS Systems

- **CBP Arrival and Departure Information System (ADIS):** facilitates the identification and investigation of individuals who may have violated their admission status by remaining in the United States beyond their authorized terms of entry. ADIS contains biographic information, biometric indicators, and encounter data consolidated from various systems from DHS and the Department of State (DOS). ELIS queries ADIS for Date of Entry and Port of Entry when this information is not provided in the daily batch file of immigrant visa crossing records received in the DataShare file.¹³⁴
- **ICE Enforcement Integrated Database (EID):** captures and maintains information related to the investigation, arrest, booking, detention, and removal of persons encountered during immigration and criminal law enforcement investigations and operations conducted by ICE, CBP, and USCIS. USCIS ELIS can query EID.¹³⁵

External Systems

- **Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) Case Access System for EOIR (CASE):** Attorneys and other EOIR practitioners are required to register to practice in front of the EOIR and Board of Immigration Appeals. USCIS ELIS SS sends updates to the attorney and accredited representative list to CASE.
- **Department of the Treasury (Treasury)** serves as the fiscal agent for customer transactions completed electronically. USCIS ELIS receives payment confirmation after the customer is redirected to pay.gov.¹³⁶ Collection Information Repository (CIR)¹³⁷ provides settlement data related to the payment collection for ELIS cases.¹³⁸

¹³³ See DHS/USCIS/PIA-032 National File Tracking System (NFTS), available at www.dhs.gov/privacy.

¹³⁴ See DHS/CBP/PIA-024 Arrival and Departure Information System, available at www.dhs.gov/privacy.

¹³⁵ See DHS/ICE/PIA-015 Enforcement Integrated Database (EID), available at www.dhs.gov/privacy.

¹³⁶ See U.S. Department of Treasury Financial Management Services Pay.Gov Privacy Impact Assessment 2.0 available at https://fiscal.treasury.gov/fsreports/rpt/fspia/paygov_pia.pdf.

¹³⁷ CIR is a web-based tool that gives federal agencies information on deposits and collections.

¹³⁸ See The Bureau of the Fiscal Service Collections Information Repository (CIR) Privacy Impact Assessment (February 13, 2017), available at <https://www.fiscal.treasury.gov/fsreports/rpt/fspia/cirpia.pdf>.



- **U.S. Postal Service (USPS) Address Standardization Web Tool:** USCIS ELIS sends the address provided by the benefit seeker and receives USPS standardized address.
- **Department of State (DOS):** Immigrant visa issuance data from the Department of State is sent in a daily batch and ingested into USCIS ELIS. The data includes biographic data, visa case data, visa identification number, visa issuance date, class of admission, date of entry, and port of entry.¹³⁹
- **Federal Bureau of Investigation- Next Generation Identification System (FBI NGI):**¹⁴⁰ USCIS ELIS sends 10 prints and related biographic data to the FBI for criminal background check. ELIS receives the FBI criminal background check response.
- **FBI National Name Check Program:** USCIS ELIS sends name, date of birth, country of birth and other biographic data to the FBI Name Check Program. The FBI Name Check is performed as a part of the National Name Check Program (NNCP). ELIS receives response for the FBI Name Check request, which includes information when the benefit seeker was or is the subject of an investigation.
- **JP Morgan Chase (Lockbox intake channel):** USCIS ELIS receives application data and the related digitized supporting documentation for paper filed applications processed at the Lockbox.

Applicable System of Records Notice:

The following SORNs cover USCIS ELIS and the information shared:

- Alien File, Index, and National File Tracking System of Records¹⁴¹ covers the collection, use, and maintenance of applications and supplemental evidence, in addition to other information related to the individual as he or she passes through the immigration process;
- Forthcoming Immigration Biometric and Background Check (IBBC) System of Records,¹⁴² which covers the collection, use, and storage of biometric and biographic data for background checks and its results, covers background checks and their results; and

¹³⁹ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.

¹⁴⁰ The FBI replaced its Integrated Automated Fingerprint Identification System (IAFIS) with the Next Generation Identification (NGI) system. Please see the Privacy Impact Assessment Integrated Automated Fingerprint Identification System (IAFIS)/Next Generation Identification (NGI) Biometric Interoperability for more information, available at <https://www.fbi.gov/foia/privacy-impact-assessments/iafis-ngiinteroperability-1>.

¹⁴¹ DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

¹⁴² The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners.



- Benefits Information System¹⁴³ covers the collection, use, and maintenance of applications and supplemental evidence, in addition to other information related to the individual as he or she passes through the immigration process.

Retention:

TSS service retains transaction logs for auditing purposes.

The new consolidated SORN will be available at www.dhs.gov/privacy.

¹⁴³ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



APPENDIX I

Verification Initiative for Business Enterprises (VIBE)

Background:

USCIS Service Center Operations Directorate (SCOPS) developed the Validation Instrument for Business Enterprises (VIBE) system. SCOPS uses VIBE to (1) validate the business operations and financial viability of organizations seeking to employ foreign workers; and (2) identify benefit fraud based on the findings of the Fraud Detection and National Security Directorate (FDNS) and referrals by other government agencies.

Verification Initiative for Business Enterprises (VIBE) is used to assist in providing independent verification for the petitioners of non-immigrant visas in the United States.¹⁴⁴ VIBE will retrieve and consolidate data related to petitions filed by organizations requesting certain visa types into a standardized report to help Adjudicators speed up the adjudications process. VIBE is used alongside the Computer Linked Application Information Management System (CLAIMS 3) for case processing of employment based benefits to validate the eligibility of an employer filing for employment based immigration benefits and to ensure that companies are not misrepresenting themselves for the purposes of defrauding USCIS.¹⁴⁵ VIBE receives CLAIMS 3 data from Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR).¹⁴⁶

VIBE also includes a connection to Dun and Bradstreet (D&B). USCIS uses commercial information to verify a petitioning entity's qualifications for the benefit requested, to assess a petitioning entity's financial viability for cases that require the petitioning entity to establish ability to pay, and to provide a basis for a score that assists Immigration Service Officers (ISO) in identifying possible fraud concerns or contradictory information submitted by the petitioning entity. VIBE submits the petitioning entity's name and address to an Independent Information Provider (IIP), currently D&B, to retrieve commercially-available data on the petitioning entity.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

VIBE electronically receives company information from D&B and the petition information from CLAIMS 3.

¹⁴⁴ See DHS/USCIS/PIA-044 Validation Instrument for Business Enterprises (VIBE), available at www.dhs.gov/privacy.

¹⁴⁵ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at www.dhs.gov/privacy.

¹⁴⁶ eCISCOR is a repository that consolidates information collected during the adjudication of applications and petitions for immigration benefits. See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.



Category of Individuals Affected:

USCIS uses VIBE to assist in adjudicating employment-based benefit request forms and other benefits that are associated with a higher fraud risk.

Information Sharing:

VIBE interfaces with D&B and eCISCOR.

Applicable System of Records Notice:

The following SORNs cover the collection, maintenance, and use of VIBE:

- Alien File, Index, and National File Tracking System¹⁴⁷ covers the petition, supplemental evidence, and decision notices;
- Fraud Detection and National Security Records¹⁴⁸ covers the cases referred to CFDO for administrative inquiry and identified as benefit fraud; and
- Benefits Information System¹⁴⁹ covers the review of applications and petitions.

Retention:

VIBE service does not maintain/retain any data. Usually the data is in memory (queue) for few seconds for processing.

¹⁴⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

¹⁴⁸ DHS/USCIS-006 FDNS Records, 77 FR 47411 (Aug. 8, 2012).

¹⁴⁹ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



APPENDIX J

USCIS Visa Support Services Project (VSSP)

Background:

The Visa Support Services Project allows for USCIS Application Support Centers (ASC) to collect biometric and limited biographic information from individuals physically present in the United States who are seeking immigration benefits from a partner country. This prevents the applicant from having to travel to the participating country to provide information. Upon collection, USCIS temporarily retains the biometric and biographic information captured pending notice of successful transmission to the partner country. USCIS then deletes both the biographic and biometric information after the partner country confirms receipt of it. The data collected at the ASCs is not used by USCIS for any purpose. USCIS provides this service to certain partner countries for a fee agreed upon by each country and set forth in a Memorandum of Understanding (MOU).

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

Applicants submit their biographic information via their visa application. USCIS ASC personnel collect the biometric data. Through this project, the following categories of information are collected: full name, date of birth, country of birth, sex, nationality, 10 fingerprints, and a photograph.

Category of Individuals Affected:

Individuals seeking immigration benefits with the partner country.

Information Sharing:

USCIS collects biographic and biometrics from individuals who are seeking immigration benefits from partner countries.

Applicable System of Records Notice:

USCIS temporarily retains information collected on behalf of a partner country for only as long as it takes to successfully transmit the information to the partner country. While temporarily retained, USCIS does not retrieve the records using a unique personal identifier. USCIS transfers the biographic information and biometric capture to the partner country immediately after collection. USCIS deletes the information from ESB after the partner country provides confirmation of the successful transfer of the information. Therefore, no SORN is required to cover this collection.



Retention:

USCIS ESB 2 VSSP temporarily retains the limited biographic and biometric information. This temporary retention period is generally less than 30 minutes and no longer than 12 hours. Information is not transmitted to other parts of DHS.



APPENDIX K

ESB Refugee Asylum Support Service (RASS)

Background:

Pursuant to various information sharing documents, DHS, DOS, and several vetting agencies in the law enforcement and intelligence community have developed a process to share refugee application data in DOS's Worldwide Refugee Admissions Processing System (WRAPS) to enable vetting of DOS WRAPS data against each agency's respective holdings to identify possible derogatory information related to individuals seeking refugee status. ESB RASS is used as a vehicle to receive and transmit application data to partner agencies in the law enforcement and intelligence community.

DOS provides the applicant's information via DOS WRAPS to USCIS through the ESB RASS and for ingestion into the Case and Activity Management for International Operations (CAMINO).¹⁵⁰ USCIS RASS also passes the DOS WRAPS information to U.S. Customs and Border Protection (CBP) Automated Targeting System (ATS).¹⁵¹ ATS serves as a technical pass through, providing the information to National Counter Terrorism Center (NCTC), which may result in a match to derogatory holdings, when it exists. Any information that is returned by ATS is sent to CAMINO, which is then used by USCIS personnel to compile and provide a final response to DOS WRAPS. The responses are considered by DOS for determination regarding issuance of a visa and by USCIS for its determination on whether to grant the benefit.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

DOS enters applicant information it has received into WRAPS to be forwarded to vetting partners, including NCTC. The documents include information about the applicants, as well as about family members and other associates. The information relating to applicants includes: name, date of birth, city and country of birth, height, weight, gender, addresses, phone numbers, employment information, and identity documents. The information relating to family members and associates includes: name, date of birth, country of birth, gender, addresses, and phone numbers. This information is ingested into CAMINO.

ESB forwards the vetting information electronically to CBP ATS. ATS acts strictly as a conduit, which will pass the information through to NCTC and does not store any information. NCTC reviews the information and sends back results, which once again will be passed through ATS strictly as a conduit to CAMINO. USCIS uses this information to assist in identifying

¹⁵⁰ See DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), available at www.dhs.gov/privacy.

¹⁵¹ See DHS/CBP/PIA-006(e) Automated Targeting System, available at www.dhs.gov/privacy.



terrorism-related grounds of inadmissibility. The “clear” or “not clear” results of the NCTC check are uploaded into CAMINO.

Category of Individuals Affected:

Individuals seeking refugee classification and resettlement in the United States are required to complete Form I-590, *Registration for Classification as Refugee* and the information is entered into WRAPS. Form I-590 collects information about the applicants, as well as about family members and other associates.¹⁵²

Information Sharing:

RASS retrieves information from DOS WRAPS for ingestion into CAMINO. USCIS RASS also passes the DOS WRAPS information to CBP ATS.

Applicable System of Records Notice:

The following SORNs cover the collection, maintenance, and use of the information for refugee resettlement:

- Refugee Case Processing and Security Screening Information SORN covers the collection, use, maintenance, and dissemination of refugee data, to include application intake, security checks, and adjudication;¹⁵³
- DOS Refugee Case Records SORN covers the collection of information from individuals who have applied for admission to the United States as refugees that is stored in WRAPS;¹⁵⁴ and
- Forthcoming Immigration Biometric and Background Check (IBBC) System of Records, which covers the collection, use, and storage of biometric and biographic data for background checks and its results, covers background checks and their results.¹⁵⁵

¹⁵² Associates are voluntarily provided by the applicant as part of the family tree and could include points of contact in the United States and other individuals with whom the applicant associates. Part of the reason these points of contact are provided are for determining the applicant’s geographic location of resettlement in the United States.

¹⁵³ DHS/USCIS-017 Refugee Case Processing and Security Screening Information, 81 FR 72075 (Oct. 19, 2016).

¹⁵⁴ STATE-59 Refugee Case Records, 77 FR 5865 (Feb. 6, 2012).

¹⁵⁵ The USCIS Office of Privacy is consolidating DHS/USCIS-002 Background Check Service and DHS/USCIS-003 Biometric Storage System SORNs into the Immigration Biometric and Background Check SORN to holistically cover biometric and biographic screening and background checks for USCIS customers and international partners. The new consolidated SORN will be available at www.dhs.gov/privacy.



Retention:

USCIS ESB 2 RASS temporarily retains the limited biographic information. This temporary retention period is generally less than 30 minutes and no longer than 12 hours. Information is not transmitted to other parts of DHS.



APPENDIX L

Central Index System Support Service (CIN-SS)

Background:

The Central Index System (CIS) is a repository of electronic data that summarizes the history of an individual in the adjudication process. CIS serves as the focal point for many disparate USCIS systems to consolidate information about a person requesting benefits. CIS sends and receives updates from these systems to keep the most up-to-date record of an individual's A-File status and location. National File Tracking System was built to replace CIS; however, there are features in CIS that were not implemented in NFTS. NFTS in combination with other applications, such as the Central Index System (CIS), provides a repository of A-File and Receipt File information.

CIN-SS provides near real-time integration of the CIS and the NFTS. Both systems are used to request that an Alien File be checked out, and have query capabilities to locate where a file is currently located. CIN-SS is an ESB middleware service that facilitates data transactions between CIS and NFTS (soon to be RAILS). Both systems communicate with each other through ESB-CIN-SS to synchronize data on A-Number Range Records and A-File Transfers.

CIN-SS also facilitates communication between NFTS and the Refugee Asylum, and Parole System (RAPS). USCIS employees are able to use RAPS to request a file transfer. RAPS, in turn, communicates with ESB-CIN-SS to get file transfer request data for an A-Number from NFTS.

Information Collected, Retained, and Disseminated and Source(s) of any PII and SPII:

ESB-CIN does not collect, retain, and save any information. ESB-CIN-SS acts as an intermediary and transfer data to and from between sender and receiver systems. ESB-CIN-SS transfers specific location of immigration files, and to track the request and transfer of immigration files. The information sent include as first name, last name, date of birth, alien number, and file location information.

Category of Individuals Affected:

CIN-SS facilitates the transfer of A-File information between CIS and NFTS, as well as NFTS and RAPS. Immigration files (i.e., A-File and Receipt Files) are created for applicants and petitioners seeking immigrant and non-immigrant benefits.

Information Sharing:

The ESB CIN-SS provide a middleware layer to facilitate communication and data transfer between the CIS and NFTS, as well as NFTS and RAPS.



Applicable System of Records Notice

Alien File, Index, and National File Tracking System¹⁵⁶ accounts for the specific location of immigration files, and to track the request and transfer of immigration files.

Retention:

USCIS ESB 2 CIN temporarily retains limited biographic information. This temporary retention period is generally less than 30 minutes and no longer than 12 hours. Information is not transmitted to other parts of DHS.

¹⁵⁶ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).