



Privacy Impact Assessment  
for

**IMPACT**

**DHS/USCIS/PIA-074**

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## Abstract

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) developed IMPACT, a secure web-based system, to alleviate the need for USCIS adjudicators to perform manual system comparisons when adjudicating an immigration benefit request. IMPACT will perform requisite DHS and USCIS system checks to move a case from one status in an adjudication queue to another. USCIS is conducting this Privacy Impact Assessment (PIA) to evaluate the privacy risks and mitigations associated with IMPACT's collection, use, and maintenance of personally identifiable information (PII).

## Overview

On March 1, 2003, USCIS assumed responsibility for the immigration service functions of the U.S. Federal Government. The Homeland Security Act of 2002<sup>1</sup> dismantled the former Immigration and Naturalization Service (INS) and separated the agency into three Components within DHS.<sup>2</sup> USCIS was formed to enhance the security and improve the efficiency of national immigration services by focusing on the administration of benefit applications and petitions (hereinafter collectively referred to as "benefit request forms") for immigrants<sup>3</sup> and nonimmigrants.<sup>4</sup>

USCIS is responsible for the administration of immigration, non-immigration, and naturalization adjudication functions and for developing related immigration policies. In executing its mission, USCIS performs functions that include the intake, review, and adjudication of the following types of benefit requests:

- 1) Family-Based;<sup>5</sup>
- 2) Employment-Based;<sup>6</sup>
- 3) Humanitarian-Based;<sup>7</sup>

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<sup>1</sup> Pub. L. No. 107-296, 116 Stat. 2135.

<sup>2</sup> U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP), components within DHS, now handle immigration enforcement and border security functions.

<sup>3</sup> An immigrant is a person who wishes to live in the United States permanently.

<sup>4</sup> A nonimmigrant is a person with a permanent residence outside the United States but who wishes to be in the United States on a temporary basis (i.e., tourism, medical treatment, business, temporary work, or study).

<sup>5</sup> An individual may petition for relatives (or future relatives such as a fiancé(e) or a prospective adopted child) to immigrate to the United States.

<sup>6</sup> All foreign workers must obtain permission to work legally in the United States. Each employment category for admission has different requirements, conditions, and authorized periods of stay. USCIS offers the following employment-based categories: temporary (nonimmigrant) worker, permanent workers, students and exchange visitors, and temporary visitors for business.

<sup>7</sup> USCIS provides a number of humanitarian programs and protections to assist individuals in need of shelter or aid from disasters, from oppression, for emergency medical issues, and for other urgent circumstances, including:



4) Adoption;<sup>8</sup> and

5) Citizenship and Naturalization.<sup>9</sup>

USCIS processes many different types of immigrant and non-immigrant requests for benefits for the five categories of benefit requests described above. Any immigration request is subject to an in-person interview at a USCIS Field Office.<sup>10</sup> During the adjudication process, USCIS officers at the Field Offices are also responsible for adjudicating applications and petitions for persons seeking immigration benefits. USCIS Field Offices handle the filing, data entry, interview, and adjudication of these immigration services and benefits.<sup>11</sup>

Upon receiving a benefit request form at a USCIS Field Office, dedicated Field Office personnel review incoming benefit request forms to ensure the submission is complete (e.g., the application is filled out in its entirety, the correct fee was submitted, all supporting documentation was submitted). USCIS will reject improperly filed benefit request forms with a written explanation as to why the form was rejected and any corrective action needed. During the review, Field Office personnel are ascertaining whether:

- The biographical information portion is complete and there is a signature on the form;
- The form was submitted to the correct USCIS Field Office location;
- There is basic eligibility (including visa availability) for the individual to receive the requested immigration benefit (e.g., whether the individual who submitted the I-485, *Application to Register Permanent Residence or Adjust Status*, is eligible to receive a green card)<sup>12</sup>; and
- The correct fee was submitted.

During this preliminary review, USCIS Field Office personnel access multiple USCIS and DHS systems to verify and validate the information presented by the benefit requestor. To streamline the preliminary review of an application and assist with the remaining steps in the

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asylum; refugee; parole; deferred action; temporary protective status; battered spouse, children, and parents; and victims of human trafficking and other crimes.

<sup>8</sup> USCIS is responsible for determining the eligibility and suitability of the Prospective Adoptive Parents (individuals) looking to adopt and determining the eligibility of the child to immigrate to the United States.

<sup>9</sup> Naturalization is the manner in which a person not born in the United States voluntarily becomes a U.S. citizen.

<sup>10</sup> A USCIS Field Office handles scheduled interviews for USCIS applications. They also provide limited information and applicant services that supplement those USCIS provides through [www.uscis.gov](http://www.uscis.gov) and by phone at 1-800-375-5283.

<sup>11</sup> See DHS/USCIS/PIA-061 Benefit Request Intake Process, available at <https://www.dhs.gov/publication/dhs-uscis-pia-061-benefit-request-intake-process>.

<sup>12</sup> For more information see <https://www.uscis.gov/greencard/eligibility-categories>.

course of the adjudication process (e.g., background checks, interviews), USCIS is piloting the use of IMPACT.<sup>13</sup>

### **IMPACT**

IMPACT is a secure, web-based system used to perform requisite DHS and USCIS system checks in order to assist in moving a case from one status in an adjudication queue to another. IMPACT has a web-based user interface used by USCIS Field Offices to perform manual system comparisons during the benefit review process. IMPACT is interconnected with multiple DHS systems via direct access or via the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)<sup>14</sup> and the Person Centric Query Service<sup>15</sup> to perform system checks to verify that the information presented on an application is consistent with what is in DHS systems. IMPACT seeks to verify that the source system information connected to IMPACT matches the information provided on forms submitted by the applicant. USCIS adjudicators historically manually conducted these checks by accessing each system separately. IMPACT serves only to makes comparisons between benefit request forms and information in DHS and USCIS systems; it does not conduct system-qualified approvals, meaning IMPACT does not take the manual review and approval out of the benefit adjudication process. Should IMPACT reveal an inconsistency, IMPACT flags the case for additional manual review. If the additional review warrants an update to USCIS records, privileged USCIS personnel make the correction to the USCIS source systems.

USCIS configured IMPACT to identify inconsistencies between benefit request forms and information contained in DHS and USCIS systems as potential risk patterns, in accordance with pre-determined adjudicative business rules outlined by USCIS internal standard operating procedures. USCIS groups these business rules into logical functions called “case machines” that perform the system checks required in the adjudication of a benefit request. USCIS groups these case machines into “workflows” that define sets of system checks. A group of benefit requests that USCIS processes in the same way (e.g., USCIS processes all Form I-130, *Petition for Alien Relative* the same way) is called a “case collection.”<sup>16</sup> Once USCIS establishes the adjudication rules for a case collection, the adjudicator chooses which workflow to associate with the case collection. USCIS personnel are able to set up regularly scheduled tasks to collect new benefit request forms for the case collection and run the forms through the defined workflows. The

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<sup>13</sup> IMPACT is not an acronym.

<sup>14</sup> See DHS/USCIS/PIA-023(b)-Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at <https://www.dhs.gov/publication/dhs-uscis-pia-023a-enterprise-citizenship-and-immigrations-services-centralized>.

<sup>15</sup> See DHS/USCIS/PIA-010 Person Centric Query Service, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>16</sup> Typically, a case collection is a group of cases of the same form type, class preference, and other identifying characteristics.



IMPACT user interface also allows adjudicators to select a benefit request form and view the results of the workflows that were executed against that case.

When viewing IMPACT, adjudicators are able to view the information from a benefit request form in the associated case management system (e.g., CLAIMS 3<sup>17</sup>), and are also able to view any physical paper forms. Adjudicators use both the original benefit request form and the result of the interconnected system checks presented by IMPACT as part of the adjudication process. As described above, IMPACT does not conduct system-qualified approvals. Adjudicators review the information presented by IMPACT, and conduct other relevant checks, prior to adjudicating the benefit request form. IMPACT is not the sole system or process used in the adjudication process.

The ultimate goal of IMPACT is to increase case processing efficiency by providing the most current and accurate access to data contained within governmental systems, eliminating delays, and reducing case-per-hour rates and cycle times. IMPACT will also determine the risk factor in each case to determine the complexity of each application's adjudication and interview time, so that USCIS Field Offices can maximize staffing allocation times per case.<sup>18</sup>

During the pilot period, access to IMPACT will be limited to USCIS adjudicators and USCIS adjudication support staff at the National Benefits Center. During the pilot period, USCIS will evaluate IMPACT's operational effectiveness. If the pilot proves to be successful, USCIS plans to fully operationalize the tool for use for adjudicators and support staff at all Field Offices.

## 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?

Section 103 of the Immigration and Nationality Act (INA) provides the legal authority for this system.<sup>19</sup>

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<sup>17</sup> See DHS/USCIS/PIA-016 Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at <https://www.dhs.gov/publication/dhsuscispia-016-computer-linked-application-information-management-system-claims-3-and>.

<sup>18</sup> Risk factors are based off of a composite score of total risks from the following categories: (1) Case Complexity, (2) National Security, (3) Public Safety, (4) Fraud, and (5) Eligibility.

<sup>19</sup> 8 U.S.C. § 1103.



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

SORN coverage is dependent on the source systems used to complete the system check. Appendix A includes the relevant SORN for each system. If additional systems are added, USCIS will update Appendix A to include the relevant SORNs.

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

Yes. IMPACT is a minor application under Digital Innovation and Development-Information Technology (DID-IT). USCIS completed the DID-IT security assessment and authorization documentation in April 30, 2014, and was subsequently enrolled in the USCIS Ongoing Authorization Program.<sup>20</sup> Despite its enrollment in the USCIS Ongoing Authorization Program, DID-IT has not met all of its privacy compliance requirements.

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

USCIS is drafting the Assisted Case Processing Tools Retention Schedule, which proposes to retain automated case processing system information for 6 years after the last completed case action.

## **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.**

Yes. The benefit request forms processed using IMPACT are covered by the PRA. A list of the immigration forms processed in IMPACT, along with the OMB Control Numbers, is available in Appendix B. USCIS will update the appendix as additional forms are added.

## **Section 2.0 Characterization of the Information**

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

IMPACT connects to eCISCOR, PCQS, and directly to USCIS and DHS systems to retrieve source system data on a nightly basis. IMPACT retrieves data pertaining to cases selected

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<sup>20</sup> The Ongoing Authorization requires DID-IT, including IMPACT, to be reviewed on an annual basis to maintain its security posture and maintain its ATO.





for adjudication by the case collection definitions, and uses this data to match between source systems. Appendix A to this PIA includes a complete list of systems with which IMPACT connects, including what information is sent to IMPACT. IMPACT receives basic biographic information from the connected systems, including:

- First Name;
- Last Name;
- Date of Birth (DOB);
- Country of Citizenship (COC);
- Country of Birth (COB);
- I-94 Number;
- Alien Number;
- Passport Number/Data; and
- Passport Expiration Date.

USCIS will update the Appendix as new systems checks are added with new data elements.

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

IMPACT retrieves information from source systems either directly or via eCISCOR and PCQS to check previously submitted information against the benefit request form submitted by the benefit requestor. The original source of the systems connected to eCISCOR and PCQS is dependent on the source system. Please refer to the source system PIAs listed in Appendix A for the original source.

## **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.

## **2.4 Discuss how accuracy of the data is ensured.**

IMPACT retrieves source system information either directly or via eCISCOR and PCQS. If inconsistencies exist between benefit request form information and information obtained from source systems, the adjudicator conducts an additional review to evaluate the accuracy of the information. Furthermore, any inconsistencies could assist the adjudicator in developing a line of



questioning for the interview with the applicant or the adjudicator may elect to issue a Request for Evidence to assist with reconciling any inconsistencies.

Additionally, USCIS Field Offices have a quality control unit that reviews a statistical sampling of IMPACT checks.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** There is a risk that the information IMPACT uses to conduct automatic checks may be inaccurate because IMPACT relies on the accuracy of information that is manually input into the source systems.

**Mitigation:** USCIS has mitigated this risk by developing separate, detailed Standard Operating Procedures (SOP) for handling information collected in each of the numerous USCIS forms completed by benefit requestors. These SOPs include detailed quality control reviews that help to ensure that the information contained in source systems has been accurately transferred from the forms submitted by individuals into the associated case management systems. These procedures also instruct how data entry personnel handle inconsistencies during data entry. The SOPs cover every stage of data entry from the time the envelope is opened until the time the data is entered into the associated case management systems and saved. USCIS also requires a second level review and quality assurance check to verify the accuracy of the information in USCIS source systems against the information on the form.

IMPACT also retrieves information from non-USCIS systems. A discussion of how each source systems ensures data accuracy is included in the published source system PIAs.

**Privacy Risk:** There is a risk that this system may collect data that is out of date, and thus inaccurate, from other systems.

**Mitigation:** IMPACT ensures the accuracy of the PII by retrieving source system information either directly or from eCISCOR and PCQS on a nightly basis. The source systems have SOPs in place to correct erroneous information. Additionally, USCIS Field Offices have a quality control unit that reviews a statistical sampling of IMPACT checks.

## **Section 3.0 Uses of the Information**

### **3.1 Describe how and why the project uses the information.**

USCIS Field Offices will use IMPACT to alleviate the need for USCIS adjudicators to perform manual system comparisons, which will streamline the receipt of benefit requests and assist with the adjudication of the requested immigration benefit.





**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.

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

IMPACT is not accessible outside of USCIS. However, IMPACT connects to CBP and ICE systems either directly or via PCQS to conduct automatic system comparisons against the data in CBP and ICE systems.

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

**Privacy Risk:** There is a risk that IMPACT will be used to conduct system-qualified approvals.

**Mitigation:** IMPACT is not configured to perform approvals, and USCIS will not use it to conduct system-qualified approvals. Cases will not be approved without manual review. IMPACT flags any inconsistencies for a further investigation and correction by a privileged user in the source system. If USCIS chooses to configure IMPACT to do so in the future, USCIS will update this PIA.

**Privacy Risk:** There is a risk of unauthorized access to IMPACT.

**Mitigation:** USCIS protects IMPACT from unauthorized access through administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a valid need-to-know to access the information in IMPACT. Access to IMPACT is given to Field Office personnel for the purpose of comparing information submitted on the paper from by the benefit requestor to the information that resides in DHS systems. USCIS also deploys user logs to ensure users are only accessing information related to their job functions.

## Section 4.0 Notice

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

IMPACT does not collect any new information but rather compares information provided by the applicant as part of a request for an immigration benefit. The instructions on each benefit



request form contain a Privacy Notice and instructions on how to file, where to send, and how to contact USCIS if there is a problem. Each Privacy Notice provides notice to individuals about USCIS's authority to collect information, the purposes of data collection, routine uses of the information, and the consequences of declining to provide the requested information to USCIS. Individuals are also provided general notice through the publication of this PIA and the associated SORNs identified in the appendix of this PIA. Additional information, including Frequently Asked Questions (FAQ) about certain benefit types, is available on the USCIS webpage or individuals may contact the National Customer Service Center (NCSC).<sup>21</sup>

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

All USCIS benefit requests are voluntary. However, to determine whether an individual is eligible for a requested immigration benefit individuals must complete benefit request forms; provide supplemental evidence where appropriate; and pay the associated fees, if not waived. This information is critical to enable USCIS to make an adjudication decision to grant or deny an immigration benefit. Failure to provide the requested information may prohibit or otherwise hinder USCIS from adjudicating the request for immigration benefits

## **4.3 Privacy Impact Analysis: Related to Notice**

There is no privacy risk associated with notice because USCIS provides notice to individuals through a Privacy Notices contained on all immigration benefit forms, this PIA, associated SORNs, the USCIS website, benefit-specific FAQs, and through the National Customer Service Center.

## **Section 5.0 Data Retention by the project**

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

USCIS has drafted and submitted to NARA for their review the Assisted Case Processing Tools Retention Schedule, which proposes to retain automated case processing system information for 6 years after the last completed case action.

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<sup>21</sup> The NCSC serves as the primary method for customers to telephonically request assistance with applications and petitions, regulatory information, and up-to-date status information on benefit applications and petitions. *See* DHS/USCIS/PIA-054 NCSC, available at <https://www.dhs.gov/publication/dhs-uscis-pia-054-national-customer-service-center>.



## **5.2 Privacy Impact Analysis: Related to Retention**

While there are always inherent risks associated with retaining information for any period of time, there are minimal risks associated with retention in IMPACT. IMPACT is proposing to retain data for 6 years, which is consistent with the concept of retaining data only for as long as necessary to support the USCIS mission. Until the retention period is established, USCIS will retain all information indefinitely. Once the period is established, USCIS will dispose the end of the retention period (either automatically or manually). This will mitigate the risk that information IMPACT is retained longer than necessary to accomplish the purpose for which it was originally collected.

## **Section 6.0 Information Sharing**

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

No. USCIS does not share information from IMPACT with external agencies or entities. However, uses IMPACT to support its adjudicative decision, which is ultimately logged in the relevant case management system (e.g., CLAIMS 3). The case management and its information may be shared externally. For a full discussion of case management system information-sharing practices, please refer to Section 6.0 of the USCIS case management system PIAs.

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

No. USCIS does not share information from IMPACT with external agencies or entities.

### **6.3 Does the project place limitations on re-dissemination?**

No. There are no limitations on re-dissemination because USCIS does not share information from IMPACT with external agencies or entities.

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

USCIS does not share information collected by IMPACT with external entities.

## **6.5 Privacy Impact Analysis: Related to Information Sharing**

There is no privacy impact related to information sharing because information is not shared with external entities.

## **Section 7.0 Redress**

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

An individual may gain access to his or her USCIS records by filing a Privacy Act or Freedom of Information (FOIA) request. Only U.S. citizens, lawful permanent residents, and individuals covered by the Judicial Redress Act of 2015 (JRA) may file a Privacy Act request.<sup>22</sup> Any person, regardless of immigration status, may file a FOIA request. 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  
FOIA/Privacy Act Program  
P. O. Box 648010  
Lee's Summit, MO 64064-8010

Additional information about Privacy Act/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, lawful permanent residents, and individuals covered by the JRA are afforded the ability to correct information by filing a Privacy Act Amendment. U.S. citizens and lawful permanent residents should submit requests to contest or amend information contained in IMPACT as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, the proposed amendment, and any evidence of the correct information. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." The record must be identified in the same manner as described for making a request for access.

Persons not covered by the Privacy Act are also able to amend their records. If a person finds 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.

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<sup>22</sup> The Judicial Redress Act of 2015, 5 U.S.C. § 552a note, extends certain rights of judicial redress under the Privacy Act to citizens of certain foreign countries or regional economic organizations; more information is available at <https://www.justice.gov/opcl/judicial-redress-act-2015>.



### **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 on USCIS forms, the USCIS website, this PIA, and the A-File SORN.

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that USCIS may not afford an individual adequate opportunity to correct information retrieved by IMPACT from the connected IT systems.

**Mitigation:** IMPACT is not the system of record for any of its stored or transferred data. IMPACT provides a mechanism for USCIS to access and share data to and from multiple connected systems. The information accessed and retrieved by IMPACT is obtained from connected IT systems. The underlying connected IT systems are fully responsible for any information sent to or provided by IMPACT. It is the responsibility of the connected system owner to provide procedures for access and redress in accordance with FOIA/PA. Individuals may seek more information on access, redress, or correction by reviewing the PIA for the individual system.

## **Section 8.0 Auditing and Accountability**

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

In accordance with DHS security guidelines, IMPACT has auditing capabilities that log user activities. IMPACT tracks all user actions via domain security audit logs to identify audit information by user identification, network terminal identification, date, time, and data accessed. IMPACT employs auditing measures and technical safeguards to prevent the misuse of data. Many users have legitimate job duties that require them to design, develop, and optimize the system. These users perform this work under supervisory oversight. USCIS requires each employee to undergo an annual security awareness training that addresses his or her duties and responsibilities to protect the integrity of the information. In addition, the IMPACT system has internal audits separate from the domain security audits; therefore, a double layer of audit trails exists.

Furthermore, IMPACT is housed in the FedRAMP-approved Amazon Web Services (AWS) cloud environment, at a moderate confidentiality that allows USCIS to host PII.<sup>23</sup> AWS US East/West is a multi-tenant public cloud designed to meet a wide range of regulatory requirements, including Government compliance and security requirements.<sup>24</sup> FedRAMP is a U.S. Government-

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<sup>23</sup> <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

<sup>24</sup> Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.



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

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

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). The Computer Security Awareness Training examines appropriate technical, physical, and administrative control measures. Leadership at each USCIS office is responsible for ensuring that all federal employees and contractors receive the required annual Computer Security Awareness Training and Privacy Training.

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

USCIS uses role-based access controls and enforces a separation of duties to limit access to only those individuals who have a need-to-know in order to perform their duties. Each operational role is mapped to the set of system authorizations required to support the intended duties of the role (e.g., adjudicators have read-only access while administrators have the ability to configure rules). The mapping of roles to associated authorizations enhances adherence to the principle of least privilege. Authorized users are broken into specific classes with specific access rights. This need-to-know is determined by the respective responsibilities of the employee. These are enforced through DHS and USCIS access request forms and procedures.

## **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 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 USCIS Privacy Officer, Chief of Information Security Officer, Office of Chief Counsel, and the respective Program Office.





## 8.5 Privacy Impact Analysis: Related to the Accountability and Integrity of the Information.

**Privacy Risk:** The data maintained by AWS for the purposes of cloud hosting may be vulnerable to breach, because security controls may not meet system security levels required by DHS.

**Mitigation:** This risk is mitigated. USCIS is responsible for all PII associated with the IMPACT system, whether on a USCIS infrastructure or on a vendor's infrastructure, and it therefore imposes strict requirements on vendors for safeguarding PII data. This includes adherence to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.<sup>25</sup>

## Responsible Officials

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

## Approval Signature

[Original, signed copy complete and on file with the DHS Privacy Office]

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Philip S. Kaplan  
Chief Privacy Officer  
Department of Homeland Security

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<sup>25</sup> See <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>.



## Appendix A

### **eCISCOR:**

IMPACT retrieves the below data elements via eCISCOR from the following source systems:

### ***Computer-Linked Application Information Management System 3 (CLAIMS 3):***

#### **Data Elements:**

- First Name
- Last Name
- Date of Birth (DOB)
- Country of Citizenship (COC)
- Country of Birth (COB)
- Current Class Preference - class of admission
- Requested Class Preference
- Entry Validity Date
- Case Status
- I-94 Number
- Form Number Filing Date
- Alien Number
- Preparer Name
- Co-applicant Name
- Co-applicant DOB
- Co-applicant Status
- Beneficiary Zip Code
- part\_2\_1<sup>26</sup>
- Date the Beneficiary Classification expires
- Number of Beneficiaries
- Attorney Contact Information

**PIA:** CLAIMS 3 and Associated Systems<sup>27</sup>

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<sup>26</sup> This is a specific data element relating to whether an applicant is requesting extension of stay (EOS) or change of status (COS) on Form I-539. The name originated from “part two of the form, question one.”

<sup>27</sup> DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, *available at* <https://www.dhs.gov/publication/dhsuscispia-016-computer-linked-application-information-management-system-claims-3-and>.



SORNs: Benefits Information System<sup>28</sup> and Alien File, Index, and National File Tracking System of Records (A-File)<sup>29</sup>

**PCQS:**

IMPACT communicates with PCQS to retrieve the following source system data on a nightly basis:

***ICE Enforcement Integrated Database (ENFORCE):*****Data Elements:**

- First Name
- Last name
- DOB
- A-Number
- Removal Proceeding Information

PIA: Enforcement Integrated Database (EID)<sup>30</sup>

SORN: CARIER<sup>31</sup>

***USCIS Customer Profile Management System (CPMS):*****Data Elements:**

- Rap Sheet (Identity History Summary)<sup>32</sup>

PIA: CPMS<sup>33</sup>

SORN: Immigration Biometric and Background Check<sup>34</sup>

***USCIS Global*****Data Elements:**

- Information regarding final grant of asylum

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<sup>28</sup> DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).

<sup>29</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

<sup>30</sup> DHS/ICE/PIA-015 Enforcement Integrated Database (EID), available at <https://www.dhs.gov/publication/dhsicepia-015h-enforcement-integrated-database-eid-criminal-history-information-sharing>.

<sup>31</sup> DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), 81 FR 72080 (Oct. 19, 2016).

<sup>32</sup> USCIS submits fingerprints to the Federal Bureau of Investigation (FBI). When FBI responds to the fingerprint check with a “Match,” it means the FBI has criminal history information relating to the fingerprints submitted. A Match response is usually accompanied by the Identity History Summary, previously known as the Record of Arrest and Prosecution Sheet (RAP Sheet).

<sup>33</sup> DHS/USCIS/PIA-60 Customer Profile Management System (CPMS) available at <https://www.dhs.gov/publication/dhsuscispia-060-customer-profile-management-service-cpms>.

<sup>34</sup> DHS/USCIS-018 Immigration Biometric and Background Check, 83 FR 36950 (July 31, 2018).



- Information regarding Immigration Judge decision appeal

PIA: USCIS Asylum Division<sup>35</sup>

SORNs: Alien File, Index, and National File Tracking System of Records (A-File),<sup>36</sup> Asylum Information and Pre-Screening,<sup>37</sup> and Immigration Biometric and Background Check<sup>38</sup>

### **Direct Connections:**

*Customers and Border Protection (CBP) Arrival and Departure Information System (ADIS):*

#### Data Elements:

- First Name
- Last Name
- DOB
- Passport Number/Data
- Passport Expiration Date
- Arrival Dates
- Departure Dates
- Status Expiration Date
- Receipt Numbers/Applications Filed/Related Cases
- Comments

PIA: Arrival and Departure System<sup>39</sup>

SORN: Arrival and Departure Information System<sup>40</sup>

As system checks are added to IMPACT, USCIS will add an appendix documenting the new systems.

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<sup>35</sup> DHS/USCIS/PIA-27 USCIS Asylum Division available at <https://www.dhs.gov/publication/dhsuscispia-027b-refugees-asylum-and-parole-system-and-asylum-pre-screening-system>.

<sup>36</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

<sup>37</sup> DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (Nov. 30, 2015).

<sup>38</sup> DHS/USCIS-018 Immigration Biometric and Background Check, 83 FR 36950 (July 31, 2018).

<sup>39</sup> DHS/CBP/PIA- 24 Arrival and Departure System (ADIS), available at <https://www.dhs.gov/publication/arrival-and-departure-information-system>.

<sup>40</sup> DHS/CBP-021 Arrival and Departure Information System (ADIS), November 18, 2015, 80 FR 72081.

## Appendix B

### USCIS Forms and Associated OMB Control Numbers processed using IMPACT

<u>Form Number</u>	<u>Form Name</u>	<u>OMB Control Number</u>
<b>I-130</b>	Petition for Alien Relative	1615-0012
<b>I-485</b>	Application to Register Permanent Residence or Adjust Status	1615-0023