



Privacy Impact Assessment  
for the

## CAP Tracker

**DHS/USCIS/PIA-072**

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## Abstract

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration and non-immigration benefits. For all incoming applications, petitions, and forms, USCIS reviews the completeness and acceptability of each one and rejects those failing to meet the stated criteria. USCIS developed the CAP Tracker system to track and maintain an inventory of all rejected filings. CAP Tracker is also used to generate standardized rejection notices sent to applicants or petitioners and, if applicable, legal representatives. USCIS is conducting this Privacy Impact Assessment (PIA) to evaluate the privacy risks and mitigations associated with CAP Tracker's collection, use, and maintenance of personally identifiable information (PII).

## Overview

USCIS developed the CAP (not an acronym) Tracker system to track and maintain an inventory of all rejected filings. USCIS receives and adjudicates applications, petitions, and forms (benefit request forms) for all immigration and non-immigration benefits.<sup>1</sup> An applicant or petitioner (collectively referred to as benefit requestor) or his/her attorney or accredited representative (legal representatives), may submit a benefit request form, required supporting documents, and applicable fee payment or fee waiver to either a USCIS Lockbox<sup>2</sup> or USCIS Service Center, depending on the form.<sup>3</sup> USCIS forms have specific instructions regarding how and where to file the completed form. Benefit requestors or legal representatives must file benefit request forms according to the specific instructions provided for each particular form. Different USCIS facilities accept different types of benefit request forms, so it is important that forms are submitted to the proper location.

Incoming paper-based benefit request forms are received and reviewed by USCIS personnel at a USCIS Service Center, National Benefits Center, or Lockbox facility. Forms must

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<sup>1</sup> A benefit request is any application, petition, motion, appeal, or other request relating to an immigration or naturalization benefit, whether such request is filed on a paper form or submitted in an electronic format, provided such request is submitted in a manner prescribed by DHS for such purpose.

<sup>2</sup> 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. Not all USCIS forms are submitted directly to a Lockbox facility. Lockbox intake is prioritized for fee-bearing forms and therefore, not all forms are submitted directly to the Lockbox. Lockbox intake includes a) a secure environment for fee collections, resulting in improved internal controls; b) centralized and expedited application and fee-collection intake; c) reduced operational costs, as Treasury funds a significant portion of the Lockbox activities; and d) flexibility in addressing issues related to unanticipated surges in volume. The handful of fee-bearing forms that do not come through Lockbox are based on low-volume or business need.

<sup>3</sup> USCIS Service Centers and the National Benefit Center are the USCIS entities that receive and are responsible for processing the largest variety of benefit request forms. These centers handle the filing, data entry, and adjudication of certain forms for immigration services and benefits. In addition, fee receipting is performed by keeping track of fees charged and collected.



be filled out completely, include the correct signature, correct fee, and required information, such as reasons for filing or indicating appropriate eligibility categories.

USCIS rejects improperly filed benefit request forms with a written explanation as to why the form was rejected and any corrective action needed. If a form is rejected, USCIS returns the benefit request form, any supplemental evidence provided, and fees along with the rejection notice.<sup>4</sup> If the benefit request form was filed with a valid Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, USCIS returns the Form G-28 to the legal representative on file and sends a rejection notice to the benefit requestor and his/her legal representative.

The CAP Tracker is a centralized system that allows USCIS's two service centers – the Vermont Service Center (VSC) and the California Service Center (CSC) -- to add, update, view, and evaluate all rejected petitions returned to benefit requestor and their legal representatives. The CAP Tracker maintains rejected benefit request forms and information about the participating USCIS employees and contractors, petitioners, beneficiaries, and legal representatives.

Only benefit request forms that are accepted during the receipting process are entered into the Computer Linked Application Information Management System (CLAIMS 3) and are routed to an adjudicator for review.<sup>5</sup> The benefit request forms that are not accepted are entered into CAP Tracker and processed as rejections. There is no connection between CLAIMS 3 and CAP Tracker and information is not exchanged between systems.

Once the benefit request form is rejected, USCIS personnel may manually enter information about the rejected benefit request form into CAP Tracker, as well as upload the benefit request form and supplemental evidence provided. Information from the Form G-28, which is filed along with the benefit request form, is also entered into CAP Tracker. USCIS records information about the benefit requestor, beneficiary, and legal representative into the CAP Tracker database. Once all the information is entered into the CAP Tracker, the system generates Form I-797C, *Notice of Action*, detailing the reasons the benefit request form was rejected. The rejection notice also includes either the system-generated rejection case number or other randomly generated numbers pertinent to the case, including: benefit requestor name; benefit requestor's address; beneficiary information; and barcode number (assigned to the benefit request form filed), which is used as a rejection case number for tracking and for reference purposes in the CAP Tracker. At that time, USCIS prints and mails the rejection letter along with the original benefit request and its fee payments to the benefit requestor and/or legal representative.

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<sup>4</sup> Supporting documentation is the initial evidence that is required as proof of identification and as justification of eligibility for a benefit. These documents are required for USCIS to make a decision on your application. Examples of supporting documentation include copies of birth certificates, marriage licenses, Permanent Resident Cards, etc.

<sup>5</sup> See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



USCIS also uses the information contained in the CAP Tracker to generate statistical reports to measure productivity trends, reasons for rejection, and average processing times to evaluate workload for proper resource allocation. Generally, the reports are statistical and aggregated with limited identifying information. On occasions, however, USCIS may generate reports with SPII to identify duplicate filings. Data from CAP Tracker may be exported into Comma Separated Values (CSV) or a Microsoft Excel spreadsheet for management purposes. These reports are used to determine volumes and trends in the types of rejections that are issued. The system generated reports assist USCIS in determining ways to improve internal processes and better inform customers on how to avoid rejections. The information is also used to enhance electronic documentation to assist in litigation, standardize response language in rejection letters, ensure similar language is used by both USCIS service centers (CSC and VSC), and to provide better and more consistent service to customers.

## **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?**

The Immigration and Naturalization Act (INA), 8 USC 1101, 1103, 1201 and 1255 *et seq.*, provides the legal authority to collect and disseminate the information maintained in the CAP Tracker application.

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

The information collected, used, and maintained in CAP Tracker is covered by the following SORN(s):

- General Information Technology Access Account Records System (GITAARS), which covers the collection, use, maintenance of USCIS employee and contractor data;<sup>6</sup>
- Alien File, Index, and National File Tracking System of Records, which covers the collection, use, and maintenance of petitions and supplemental evidence;<sup>7</sup> and
- Benefits Information System, which covers the collection and use of benefit request forms, decisional data, and associated fees for adjudication.<sup>8</sup>

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<sup>6</sup> DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).

<sup>7</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18 2017).

<sup>8</sup> DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



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

Yes. CAP Tracker is covered as a minor system under the Digital Innovation Development – Information Technology (DID-IT) Amazon Web Services (AWS) accreditation boundary. DID-IT completed the security assessment and authorization documentation in August 2013, and was accepted into the Ongoing Authorization program. Ongoing Authorization requires DID-IT, including CAP Tracker, to be reviewed on a monthly basis and sustain its security posture in order to maintain its Authority to Operate.

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

Yes. NARA approved the CAP Tracker retention schedule (DAA-0566-2016-0015) on October 5, 2016. Records are to be deleted and destroyed seven years from the last adjudicative 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.**

Information collected through this process is covered by the PRA. A full list of the benefit request forms entered into the CAP Tracker, along with their corresponding OMB Control Numbers, is available in *Appendix A*.

## **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.**

The CAP Tracker maintains rejected benefit request forms and information about the benefit requestor, beneficiary, and legal representatives, as well as information related to the USCIS employee or contractor who processed the request. The following information is entered into the CAP Tracker:

*Information about USCIS Federal Employee or Contractor users includes:*

- Full Name;
- User ID; and



- USCIS Email Address.

*Information about the benefit request form includes:*

- Receipt Number;
- Location: VSC or CSC;
- Received Date;
- Date Entered;
- Reject Case Number;
- Mailed Reject Date;
- Tracking Number;
- Reason for Rejection; and
- Total Fee Amount.

*Information about the Beneficiary (e.g., a foreign worker seeking to obtain a H-IB visa from U.S. employer) includes:*

- Full Name;
- A-Number;
- Social Security number;
- Date of Birth; and
- Barcode number (assigned to the benefit request form filed within a set time frame).

*Information about the Benefit Requestor includes (e.g., an employer seeking to hire a foreign worker under an H-IB visa petitioner):*

- Full Name; and
- Federal Employment Identification Number.

*Information about the Attorney/Accredited Representative includes:*

- Attorney/Accredited Representative Full Name;
- Attorney's Firm Name, if applicable; and
- Attorney's Firm Full Mailing Address, if applicable.



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

Most of the information in CAP Tracker is derived from the data provided by the benefit requestor and his or her attorney or accredited representative (legal representative) on the completed benefit request form. USCIS Service Center Operations (SCOPS) staff manually enters information submitted on the benefit request form or uploads the form and supplemental evidence into the CAP Tracker database.

## **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.**

USCIS relies on the individual and his/her legal representative to provide accurate information. These individuals are required to sign a statement certifying, under penalty of perjury, that the information included in their benefit request forms, and any submitted documents, are complete, true, and correct.

Incoming benefit request forms are reviewed by USCIS staff at either a Service Center or Lockbox facility.<sup>9</sup> All incoming benefit requests are reviewed to ensure the package is complete. USCIS has detailed Standard Operating Procedures (SOP) for handling information collected for benefit request forms. This SOP includes detailed quality control reviews that help to ensure that the information has been accurately transferred from the paper forms into CAP Tracker. These procedures ensure that all data fields are completed and describe how data entry personnel handle inconsistencies during data entry. Every stage of data entry from the time the envelope is opened until the time the data is entered into the CAP Tracker and saved is covered by the SOP.

Before SCOPS mails out rejection notices to benefit requestors, a quality review is completed to ensure the rejection was properly updated in the system and all information is correct. All information gathered is reviewed by Quality Assurance personnel for accuracy and integrity.<sup>10</sup> Auditors review the rejection process, which is divided into two phases. In the first phase, auditors are provided with randomly generated notices to validate the data entered into the CAP Tracker,

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<sup>9</sup> Lockbox facilities are operated by a specialized contractor authorized by the Department of Treasury (Treasury). See DHS/USCIS/PIA-061 Benefit Request Intake Process, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>10</sup> Quality Assurance (QA) is an integral part of the benefit adjudication process. QA review procedures help offices identify areas where staff may benefit from additional training. QA review procedures also involve statistically valid data collection and analysis methods that can be used to help ensure benefit processing is consistent across all USCIS offices.



the accuracy of the rejection notice generated, and all corresponding barcode labels. The second phase of the audit includes review of the contents of the rejection envelope for accuracy of the address label(s), rejection letters, date stamps on the notice date box, and fee information.

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

**Privacy Risk:** There is a risk of CAP Tracker containing inaccurate data due to the manual data entry process.

**Mitigation:** This risk is partially mitigated due to the minimum amount of data that USCIS manually enters into CAP Tracker. USCIS ensures data accuracy through a quality assurance review and implementing system validation rules to mitigate or prevent inconsistencies in benefit requestor data. Data validation is the process of checking the data entered into the system against a set of rules to ensure the data is correct and useful. USCIS has mitigated this risk by developing separate, detailed SOPs for entering information into USCIS systems. These SOPs include detailed quality control reviews that help to ensure that the information has been accurately entered from the paper forms submitted by individuals into the associated systems. These procedures ensure that all data fields are complete and describe how data entry personnel should handle inconsistencies. The SOPs cover every stage of data entry from the time the envelope is opened until the time the data entered into the associated system is saved. Any data errors are manually updated to reflect the correct information. USCIS is working to automate this process to remove this opportunity for human error.

**Privacy Risk:** There is a risk the CAP Tracker is collecting more information than necessary to track and generate rejection notices.

**Mitigation:** This risk is partially mitigated. USCIS mitigates the risk of collecting irrelevant information by limiting the information entered into CAP Tracker. The system is configured to collect limited information from the benefit requestor, beneficiary, and legal representative. This is the minimum amount of information necessary to track rejected filings and generate appropriate notifications. The system also captures employee information and processing data (date/time) for statistical purposes. All data elements collected on the forms are negotiated with and approved by the Office of Management and Budget (OMB) during the PRA collection review.



## 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.

USCIS uses CAP Tracker to track all rejected benefit request forms. The information in the system is used to generate rejection notices to inform the benefit requestor and legal representative of the status of the petition. The receipt number, legal representative's name, beneficiary's name, beneficiary's date of birth, beneficiary's country of birth, benefit requestor's name, benefit requestor's address, petition fee, and reason why the petition was rejected are used to create rejection notices. The information is also used to develop reports to determine volumes and trends in the types of rejections that are issued by USCIS.

### 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?

No.

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

**Privacy Risk**: There is a risk that authorized users could use the data for purposes inconsistent with the original collection.

**Mitigation**: The risk is partially mitigated. To ensure the information is used consistently with the purposes of the original collection, USCIS monitors user logs to ensure users are only accessing information related to their job functions. Prior to accessing CAP Tracker, each user must sign a user access agreement that outlines the appropriate rules of behavior tailored to CAP Tracker. USCIS implements disciplinary rules to ensure the appropriate use of the system. USCIS reminds employees accessing the system through a warning banner that informs the user of the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance. All user actions are tracked via audit logs to identify audit information by user identification, network terminal identification, date, time, and data accessed. This acts as a deterrent to unauthorized activity.



## 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.**

Individuals are provided general notice of the retention of information in CAP Tracker through the publication of this PIA and the associated SORNs: General Information Technology Access Account Records System,<sup>11</sup> Alien File, Index, and National File Tracking System,<sup>12</sup> and Benefit Information System.<sup>13</sup>

Additionally, all the applicable USCIS forms listed in Appendix A contain a Privacy Notice. The Privacy Notice provides notice to individuals about the agency'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. USCIS forms also contain a provision by which the benefit requestor authorizes USCIS to release any information received from the benefit requestor or legal representative as needed to determine eligibility for benefits.

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

Benefit requestors have an opportunity and right to decline to provide information. The benefit request form requires the benefit requestor to provide biographic information. This information is critical in making an informed decision as to whether to grant or deny a USCIS benefit. Failure to submit such information prohibits USCIS from processing and properly adjudicating the petition and thus precludes the benefit requestor from receiving his/her requested benefit.

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

There is no privacy risk related to notice. All information collected in CAP Tracker is provided directly from the benefit requestor or his/her legal representative. USCIS provides notice to individuals through a Privacy Notice on the applicable forms, this PIA, associated SORNs, and on USCIS's webpage ([www.uscis.gov](http://www.uscis.gov)).

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<sup>11</sup> DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (Nov. 27, 2012).

<sup>12</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18 2017).

<sup>13</sup> DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016).



## 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.

Yes. NARA approved the CAP Tracker retention schedule (DAA-0566-2016-0015) on October 5, 2016. Records are to be deleted and destroyed seven (7) years from the last adjudicative action. This is consistent with retention of rejected forms throughout USCIS. This retention schedule allows USCIS to address any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, FOIA/PA matters, or correcting errors in the application.

### 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 CAP Tracker. The approved NARA schedule is consistent with the concept of retaining data only for as long as necessary to support USCIS mission. To ensure data is properly disposed of or deleted at the end of the retention period, USCIS programmed CAP Tracker to automatically delete the data to adhere to the approved retention schedule. This mitigates the risk that information CAP Tracker is retained longer than necessary to accomplish the purpose for which it was originally collected.

## 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.

No. USCIS does not share information from CAP Tracker outside of DHS as a part of its normal agency operations.

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

Not applicable. USCIS does not share information from CAP Tracker outside of DHS.

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

Not applicable. USCIS does not share information from CAP Tracker outside of DHS.



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

Not applicable. USCIS does not share information from CAP Tracker outside of DHS.

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

There is no privacy risk associated with information sharing since USCIS does not share information from CAP Tracker outside of DHS as part of its normal agency operations.

## **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?**

Individuals may gain access to their USCIS records by filing a request under the Freedom of Information Act (FOIA) or Privacy Act of 1974 (Privacy Act). Account holders not covered by the Privacy Act or Judicial Redress Act of 2015 (JRA)<sup>14</sup> may still obtain access to their records consistent with FOIA, unless disclosure is prohibited by law or if USCIS reasonably foresees such a disclosure would harm an interest protected by a FOIA disclosure exemption. Any account holder seeking access to his or her information should direct their request to the following address:

USCIS National Records Center (NRC)  
FOIA/Privacy Act Office  
P.O. Box 648010  
Lee's Summit, MO 64064-8010

Further information on Privacy Act and FOIA requests for USCIS records can also be found 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 the 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/Privacy

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<sup>14</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>.



Act Office as outlined in section 7.1. Individuals must clearly and concisely state the information being contested, the reason for contesting it, their proposed amendment to the record, and clearly mark the envelope “Privacy Act Amendment.” If the request is accepted, any amendment would only apply to USCIS-held information. Persons not covered by the Privacy Act are not able to amend their records through FOIA. If non-U.S. persons find inaccurate information in their records received through FOIA, they may visit a local USCIS Field Office to identify and amend inaccurate records with evidence supporting their reasons for amendment.

### **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, Privacy Act Statements, and through USCIS personnel who interact with individuals and their legal representatives. Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. This PIA also provides similar notice. The Privacy Act Statements, including notice of an individual’s right to correct information, are also contained on the instructions to immigration forms published by USCIS. USCIS notifies individuals during their interview about the procedures for correcting application information maintained in CAP Tracker.

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

There is no privacy risk related to redress in relation to CAP Tracker. USCIS provides individuals an opportunity during and after the completion of the appeal process to correct information they have provided and to respond to information received from other sources. USCIS provides individuals with access, amendment, or correction to their records when requested through a FOIA or Privacy Act request.

## **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 federal, DHS, and USCIS policies, including the USCIS privacy policies, SOPs, orientation and training, rules of behavior, and auditing and accountability procedures. CAP Tracker is maintained in the AWS, which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational and technical controls) that are used by USCIS to protect data in



accordance with federal security guidelines.<sup>15</sup> AWS is FedRAMP-approved and authorized to host PII.<sup>16</sup> FedRAMP is a U.S. government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services.

USCIS employs technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated during the security authorization process. These technical and security controls limit access to USCIS users and mitigates privacy risks associated with unauthorized access and disclosure to non-USCIS users. DHS security specifications also require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

## **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 properly handling and securing PII. The Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (*e.g.*, SORNs, Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information. USCIS also provides role-based training on the proper uses of CAP Tracker. This training is available to each employee and contractor prior to using CAP Tracker.

## **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 users who need access to CAP Tracker are required to complete an access request form. USCIS limits access to CAP Tracker to only authorized USCIS employees and contractors with a valid need-to-know the data in the system as part of their job responsibilities. Access privileges are limited by establishing role-based user accounts to minimize access to information that the user does not need to perform essential job functions. The employee's current job functions determine his or her need-to-know. The employee's supervisor must validate that the employee needs access to the information. Moreover, USCIS limits users' access privileges by ensuring they

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<sup>15</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.

<sup>16</sup> <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.



have authorized logon credentials (*i.e.*, DHS-issued user ID and password) and have an established role-based user account.

## **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 does not have any information sharing agreements with any other DHS components or external agencies to share rejected USCIS filings. USCIS, however, has a formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for CAP Tracker must go through the USCIS change control process and approved by the proper authorities, such as the USCIS Privacy Officer, Chief of Information Security Officer, Office of 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

### Rejection Forms Entered into CAP Tracker

Form Numbers	Form Title	OMB Control Number
G-28	Notice of Entry of Appearance as Attorney or Accredited Representative	1615-0105
I-129	Petition for a Nonimmigrant Worker	1615-0009
I-129CW	Petition for a Commonwealth of the Northern Mariana Islands (CNMI)-Only Nonimmigrant Transitional Worker	1615-0111
I-129S	Nonimmigrant Petition Based on Blanket L Petition	1615-0010
I-129F	Petition for Alien Fiancé(e)	1615-0001
I-192	Application for Advance Permission to Enter as a Nonimmigrant	1615-0017
I-485	Application to Register Permanent Residence or Adjust Status	1615-0023
I-485 Supplement A	Adjustment of Status Under Section 245(i)	1615-0023
I-539	Application To Extend/Change Nonimmigrant Status	1615-0003
I-751	Petition to Remove Conditions on Residence	1615-0038
I-765	Application for Employment Authorization	1615-0040
I-824	Application for Action on an Approved Application or Petition	1615-0044
I-829	Petition by Entrepreneur to Remove Conditions on Permanent Resident Status	1615-0045
I-881	Application for Suspension of Deportation or Special Rule Cancellation of Removal (Pursuant to Section 203 of Public Law 105-100 Nicaraguan Adjustment and Central American Relief Act (NACARA))	1615-0072
I-907	Request for Premium Processing Service	1615-0048
I-914	Application for T Nonimmigrant Status	1615-0099
I-918	Petition for U Nonimmigrant Status	1615-0104
I-924	Application For Regional Center Under the Immigrant Investor Pilot Program	1615-0061
I-924A	Supplement to Form I-924	1615-0061



I-929	Petition for Qualifying Family Member of a U-1 Nonimmigrant	1615-0106
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