



**Privacy Impact Assessment Update
for the**

Validation Instrument for Business Enterprises (VIBE)

DHS/USCIS/PIA-044(a)

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Abstract

U.S. Citizenship and Immigration Services (USCIS) Service Center Operations Directorate (SCOPS) operates the Validation Instrument for Business Enterprises (VIBE) system. VIBE is used to (1) validate the business operations and financial viability of organizations seeking to employ foreign workers; and (2) identify benefit fraud based on internal and other government agencies' referrals. USCIS is updating this Privacy Impact Assessment (PIA) to discuss the sharing of data with the Department of Homeland Security's Office of Citizenship and Immigration Services Ombudsman (CISOMB) and the Department of Labor (DOL).

Overview

USCIS oversees the immigration process and is responsible for the adjudication of employment-based benefit request forms every year. In addition to the employment-based benefit request form, the employer submits voluminous amounts of evidence to show its entity meets specific eligibility requirements. Often, employing entities are required to submit completed filings along with additional background documentation to establish benefit eligibility. As part of the adjudication process, Immigration Services Officers (ISO) substantiate the submitted information and conduct security screening checks. ISOs refer cases suspected of possible immigration benefit fraud to FDNS Immigration Officers (FDNS IO) at the Center Fraud Detection Operations (CFDO) to initiate an administrative inquiry.

The USCIS Service Center Operations (SCOPS) operates VIBE to assist USCIS ISOs in the identification of valid employers while simultaneously identifying ineligible employers and potentially fraudulent filings. Before deploying VIBE, ISOs manually reviewed evidence without a standardized means of validating the information. This process made it difficult to verify the viability of the employer and made it harder to identify ineligible or potentially fraudulent benefit request forms or applications. VIBE consolidates and displays information from Computer Linked Application Information Management System (CLAIMS 3)¹ data, an independent information provider (IIP), currently Dun and Bradstreet (D&B),² and VIBE-generated information based on USCIS developed algorithms through the VIBE Status Report. This data helps identify eligible employers, as well as ineligible employers and potentially fraudulent filings. VIBE promotes

¹ CLAIMS 3 is an electronic case management application that tracks and manages the adjudication process for most domestically-filed, paper-based, immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status. For more information, see DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, *available at* www.dhs.gov/privacy.

² Dun & Bradstreet, Inc. is a company that provides commercial data, analytics and insights for businesses.



immigration integrity by enhancing USCIS' ability to distinguish eligible employers from those that are ineligible.

Reason for the PIA Update

USCIS is updating the VIBE PIA to discuss the privacy risks and mitigations with regards to the exchange of information with CISOMB and DOL. USCIS systematically shares information with the Department of Homeland Security (DHS) Office of the Citizenship and Immigration Services Ombudsman (CISOMB) and the Department of Labor (DOL) to enhance the immigration adjudication process.

Information Sharing with CISOMB

DHS CISOMB is dedicated to improving the quality of citizenship and immigration services delivered to the public by providing individual case assistance and recommendations for improvement to USCIS. CISOMB provides an impartial and independent perspective to USCIS in an attempt to resolve pending cases with problems. CISOMB does not have the authority to make or change USCIS decisions.

Individuals who applied for immigration or non-immigration benefits may seek case assistance from CISOMB on applications or petitions pending with USCIS. CISOMB provides case assistance to address procedural³ and substantive matters.⁴ CISOMB is responsible for reviewing all incoming case assistance requests by examining facts, reviewing relevant data systems, and analyzing applicable laws, regulations, policies, and procedures. After assessing each case in this manner, CISOMB may contact USCIS service centers, field offices, and other facilities to request that USCIS engage in remedial actions. If CISOMB is unable to assist, it will inform the individual that the matter is outside the scope of CISOMB's authority or otherwise does not merit further action.

USCIS and CISOMB entered into an information sharing agreement⁵ for USCIS to share USCIS system data with CISOMB in support of its mission.⁶ USCIS provides CISOMB read-only access to certain information within the VIBE Status Report, which is a consolidation of CLAIMS

³ Examples of procedural matters include typographic errors in immigration documents, cases that are 60 days past normal processing times, USCIS' failure to schedule biometric appointments, interviews, naturalization oath ceremonies, or other appointments, change of address and mailing issues, refunds in cases of clear USCIS error, and lost files and/or file transfer problems.

⁴ Examples of substantive matters include applications and petitions that were improperly rejected by USCIS, and systemic issues that should be subjected to higher level review (e.g., the exercise of discretion, the misapplication of evidentiary standards, USCIS employees failing to comply with its policies).

⁵ Available at <https://www.uscis.gov/sites/default/files/USCIS/About%20Us/Electronic%20Reading%20Room/signedmou2-23-12.pdf>

⁶ Please see the forthcoming CISOMB Information Sharing PIA, more details available at www.dhs.gov/privacy.



3 data, IIP data, as well as the VIBE Score to support CISOMB with case assistance matters.⁷ CISOMB users do not have access to the VIBE algorithmic, adjudication-related, or fraud-sensitive information within VIBE.

CISOMB uses the information from VIBE to determine whether to proceed with the case assistance request from the individual. This information allows CISOMB to assess whether to make an inquiry with USCIS and to which office to direct an inquiry. CISOMB formulates recommendations to USCIS—both formally and informally—to resolve those problems, and reports to Congress areas where the agency may need to improve.

Information Sharing with the DOL

Under the Immigration and Nationality Act (INA), U.S. employers may request that certain foreign nationals come to work for their companies on a temporary or permanent basis. U.S. employers seeking certain types of temporary⁸ or permanent⁹ workers must file for a labor certification with DOL. In those cases, the employer must demonstrate there are insufficient U.S. workers who are able, willing, available, and qualified to work in the position for which the foreign national is seeking. U.S. employers must also attest that hiring the foreign national will not displace or adversely affect the wages or working conditions of U.S. workers.

U.S. employers electronically file the relevant application (e.g., DOL Employment & Training Administration (ETA) Forms 9142A and B, Form 9089, and Form 9035) with DOL. U.S. employers filing for nonimmigrants (temporary workers) use DOL's iCERT system, while DOL's Permanent Case Management System (PERM) system is used for immigrants (permanent workers).¹⁰ If DOL approves the employer's application, the next step is for the U.S. employer to file an employment-based petition with USCIS. For nonimmigrant workers, employers file Form I-129 to request a specific non-immigrant visa classification for the worker. Immigrant visa petitions are filed on Form I-140. If USCIS approves an employment-based non-immigrant visa petition, the foreign national can obtain a visa from a U.S. consulate or embassy abroad or change or continue his or her non-immigrant status if already in the United States. An approved immigrant visa petition allows the prospective employee obtain lawful permanent resident status by obtaining an immigrant visa at a U.S. consulate or embassy abroad, or adjusting status in the United States.

DHS USCIS and DOL entered into a Memorandum of Agreement regarding employment-based petition, labor certification, and labor condition application data in support of their

⁷ The VIBE Scoring Result is a risk-based score that notifies the ISO of any potentially problematic areas in the employment-based benefit request form. The VIBE Scoring Result may also be affected if employing information or the employing entity is on a known fraud list. VIBE creates the VIBE Scoring Result by using a series of specially designed algorithms and comparing commonalities and differences between USCIS and D&B data.

⁸ Examples include H-2A nonimmigrant agricultural workers or H-2B seasonal workers.

⁹ Examples include EB-2 aliens with exceptional ability or EB-3 skilled workers.

¹⁰ See DOL Employment and Training Administration (ETA) Foreign Labor Certification (FLC) System Privacy Impact Assessment, available at <https://www.dol.gov/oasam/ocio/programs/pia/mainpia.htm>.



respective missions, effective January 12, 2017.¹¹ Both USCIS and DOL information is accessible through VIBE. USCIS provides DOL employees with read-only access to VIBE. In return, DOL shares information with USCIS through a one-way interconnection with VIBE and DOL's Data as a Service (DaaS). DaaS provides USCIS a gateway to retrieve and view the DOL labor certification data electronically from iCERT and PERM. The DOL DaaS serves as a data repository for both the DOL iCERT Visa Portal System and PERM system. This system interconnection offers a real-time, one-way transaction between DOL DaaS and USCIS VIBE. The DaaS data repository in VIBE is refreshed on a daily basis.

Through the USCIS VIBE and DOL DaaS interconnection, USCIS employees have real-time access to labor certification data electronically, rather than depending on the accuracy of paper-based labor certifications, while adjudicating employment-based benefit request forms. Through VIBE, USCIS employees are able to query DaaS by entering the DOL ETA case number, employer's business name, or Federal Employer Identification Number (FEIN) to retrieve the corresponding DOL labor certification data. The DOL ETA case number is a unique identifier to locate each ETA record in the DOL iCERT and PERM systems. VIBE compares the ETA case number entered in CLAIMS 3 against the ETA case number in DaaS for each receipt number that requires labor certifications. If there is a match on the ETA case number, VIBE retrieves the corresponding DOL data and displays a summary section in the VIBE Status Report. VIBE users with appropriate user roles are able to click the hyperlinked ETA case number in the VIBE Status Report and view the full version of corresponding DOL data.

VIBE offers two search options for USCIS employees to query DOL data: (1) manually entering ETA case number, and (2) syncing the ETA case number with the USCIS receipt number during the CLAIMS 3 data entry process to generate a VIBE Status Report. Once the search is initiated, VIBE retrieves the information from DaaS and displays the DOL labor certification data in a user interface. USCIS uses the information received by DOL to determine benefit eligibility, which is consistent with USCIS' authorities and mission. Receiving information electronically from DOL also allows USCIS to verify the validity of approved labor certifications when adjudicating employment-based benefit request forms. It will also assist USCIS in identifying fraudulent labor certification for fraud detection purposes.

DOL employees also have real-time access to VIBE data. VIBE has created a DOL user role to provide DOL users read-only access to VIBE data. DOL employees log into VIBE via their Personal Identity Verification (PIV) credential and enter the ETA case number to search the associated receipt number in VIBE. The retrieved receipt number generates a VIBE Status Report for DOL users. The data displayed in the VIBE Status Report includes the employer information from CLAIMS 3, IIP, VIBE Score result, Score card, and any previous filings.¹² If the employer

¹¹ Available at [https://www.uscis.gov/sites/default/files/files/nativedocuments/Employment-Based Petition Labor Certification and Labor Condition Application Data.pdf](https://www.uscis.gov/sites/default/files/files/nativedocuments/Employment-Based%20Petition%20Labor%20Certification%20and%20Labor%20Condition%20Application%20Data.pdf).

¹² The VIBE score is a match confidence score, which is a measurement of the level of confidence in the match



who applies for the ETA document has not yet filed an employment-based benefit request form with USCIS, the DOL user is able to generate a VIBE Status Report based on the employer's name and address on the ETA document. The DOL user can also search the employer's previous filings by entering the employer's business name and FEIN number in VIBE.

USCIS provides DOL users with direct, limited access to VIBE. The DOL user role has the same (but limited) permission level as other external users, e.g., Department Of State users, but with a manual search capability for accessing additional IIP data.¹³ DOL uses USCIS data to assist in: reviews and adjudications of labor conditions and certification applications; program integrity actions (such as business compliance with wage, working conditions, and recruitment requirements, audit examinations, supervised recruitment, debarment, and invalidations); and processing enforcement actions to ensure compliance with required wage payments, working conditions, recruitment activities, and hiring practices.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

Authorities and Other Requirements

Section 103 of the INA provides the legal authority for VIBE.¹⁴ A Memorandum of Agreement (MOA) between the DHS and DOL regarding employment-based benefit request form, labor certification, and labor condition application data was signed on January 12, 2017.¹⁵ CISOMB and USCIS memorialized their information sharing efforts in a Memorandum of Understanding (MOU) entitled "Memorandum of Understanding Between U.S. Citizenship and Immigration Services and the Citizenship and Immigration Services Ombudsman" dated March 16, 2016.¹⁶

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

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records¹⁷ covers the employment-based benefit request form, supplemental evidence, and decision notices;

between the information submitted by the petitioning entity to USCIS and the information received from the IIP. The VIBE Scoring Result is a risk-based score that notifies USCIS of any potentially problematic areas in the petition. The VIBE Score Card is a summary of the algorithm used in the process.

¹³ D&B allow DOL to access additional D&B data by conducting manual searches in VIBE.

¹⁴ 8 U.S.C. § 1103.

¹⁵ *Supra* note 11.

¹⁶ *Supra* note 5.

¹⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sep. 18, 2017).



- DHS/USCIS-006 Fraud Detection and National Security Records¹⁸ covers the cases referred to CFDO for administrative inquiry and identified as benefit fraud; and
- DHS/USCIS-007 Benefits Information System¹⁹ covers the review of employment-based benefit request forms.

VIBE is a service subsystem that falls under USCIS Enterprise Service Bus 2 (ESB 2) accreditation boundary. USCIS completed the USCIS ESB 2 system security plan and is part of 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.

The VIBE data retention schedule (DAA-0566-2017-0029) is undergoing the NARA clearance process. USCIS is proposing to destroy records 50 year(s) after an entity, practitioner, or address from a known fraud list is placed into VIBE, or when no longer needed for business reasons, whichever is longer.

VIBE is not subject to the Paperwork Reduction Act requirements because there are no forms associated with this collection.

Characterization of the Information

CISOMB Collection of USCIS Information

CISOMB has read-only access to the VIBE Status Report. The following information is displayed to CISOMB users:

Information that applies to employment-based form (CLAIMS 3)

- Receipt number and date;
- Employing entity's name;
- Physical address or mailing address;
- Adjudicative status;
- Visa type;
- Record Time-stamp;
- Any associated receipt number count for up to 3 years of previous filings;
- Immigration practitioner's address match indicator;

¹⁸ DHS/USCIS-006 - Fraud Detection and National Security Records (FDNS), 77 FR 47411 (Aug. 8, 2012).

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



Information that applies to employment-based form (IIP, currently D&B)

- D-U-N-S® Number (company unique ID received from the IIP);
- Global Ultimate D-U-N-S® Number;
- Global Ultimate company name;
- Global subsidiary (e.g., company hierarchy, parent organizations, subsidiary organizations, and affiliate organizations);
- Foreign relationships;
- Legal Status (e.g., LLC, LLP, Partnership, Sole-Proprietorship, non-profit);
- Trade styles, which are additional names used by a business for advertising or buying purposes;
- Location type (e.g., Branch Office, Subsidiary, Headquarters);
- Type of business;
- Total number of employees at a particular location;
- Total number of employees by the employing organization worldwide;
- Year established;
- Import/Export business type;
- Number of related entities;
- Number of corroborating sources, which indicates the number of authenticating source types that provide corroboration of a business's identity and existence;
- Tax exempt indicator;
- Year the current owners took control of the organization;
- Annual gross sales volume (modeled, actual, or estimated);
- Payment history of the employing organization to include total payments and timeliness of payments;
- Company executive names and titles;
- Business activity indicator, which is an indicator that measures the likelihood that the company is no longer in business. This could be based on Uniform Commercial Code (UCC) filings, lack of activity, etc.;
- A financial risk indicator, which measures the likelihood that the company will cease operations as a going concern within the next 12 months;



Information that applies to employment-based forms (generated by VIBE)

- Match confidence indicator, which indicates if the employing entity matches the entity found in D&B's records;
- VIBE Scoring Result with a Score Run Date, which compares the employing entity data against an algorithm.

DOL Collection of USCIS Information

DOL employees have a direct read-only access to VIBE data to view current and previously filed employment-based benefit request form information, specifically Form I-129 and Form I-140.²⁰ The following information is displayed to DOL users:

Information that applies to employment-based form (CLAIMS 3)

- Receipt number and date;
- Employing entity's name;
- Physical address or mailing address;
- Adjudicative status;
- Visa type;
- Record Time-stamp;
- Any associated receipt numbers up to 3 years of previous filings;
- Immigration practitioner's address match indicator;

Information that applies to employment-based forms (IIP, currently D&B)

- D-U-N-S® Number (company unique ID received from the IIP);
- Global Ultimate D-U-N-S® Number;
- Global Ultimate company name;
- Global subsidiary (e.g., company hierarchy, parent organizations, subsidiary organizations, and affiliate organizations);
- Foreign relationships;
- Legal Status (e.g., LLC, LLP, Partnership, Sole-Proprietorship, non-profit);
- Trade styles, which are additional names used by a business for advertising or buying purposes;

²⁰ See Appendix A for more information.



- Location type (e.g., Branch Office, Subsidiary, Headquarters);
- Type of business;
- Total number of employees at a particular location;
- Total number of employees by the employing organization worldwide;
- Year established;
- Import/Export business type;
- Number of related entities;
- Number of corroborating sources, which indicates the number of authenticating source types that provide corroboration of a business's identity and existence;
- Tax exempt indicator;
- Year the current owners took control of the organization;
- Annual gross sales volume (modeled, actual, or estimated);
- Payment history of the employing organization to include total payments and timeliness of payments;
- Company executive names and titles;
- Business activity indicator, which is an indicator that measures the likelihood that the company is no longer in business. This could be based on UCC filings, lack of activity, etc.;
- A financial risk indicator, which measures the likelihood that the company will cease operations as a going concern within the next 12 months;

Information that applies to employment-based forms (generated by VIBE)

- Match confidence score, which indicates how closely the employing entity matches the entity found in D&B's records;
- VIBE Scoring Result with the Score Run Date, which compares the employing entity data against an algorithm;
- VIBE "Pre-defined Company Score" comments;

USCIS Collection of DOL Information

VIBE interconnects with DaaS and temporarily displays read-only information from iCERT and PERM to USCIS employees through manual queries in VIBE. In addition, all DOL labor certification data displayed in the VIBE Status Report is stored in the VIBE database. There are three main DOL ETA forms that are specified in the data-sharing agreement, i.e., ETA Form



9035, *Labor Condition Application for Nonimmigrant Workers*,²¹ ETA Form 9089, *Application for Permanent Employment Certification*,²² and ETA Form 9142, *Application for Temporary Employment Certification*.²³ The DOL data elements based on these three ETA forms are listed in the VIBE PIA Appendix B to D.

Privacy Risk: There is a risk that inaccurate data is captured within VIBE from DaaS.

Mitigation: This risk is partially mitigated. To ensure the most up-to-date information is shared with VIBE, DaaS provides daily updates to VIBE. DaaS depends on the accuracy and quality of information from each source system. DaaS ensures the accuracy of the data by collecting the information directly from the source systems. For data that may be transferred through the DaaS, the data queried from the legacy systems is delivered as is except for 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 DaaS. The DaaS cannot and does not provide any assurance that the data it delivers is accurate.

Uses of the Information

CISOMB Use of USCIS Information

USCIS provides CISOMB read-only access to VIBE to support CISOMB case assistance. CISOMB formulates recommendations to USCIS—both formally and informally—to resolve those problems, and report to Congress areas where the agency may need to improve.

DOL Use of USCIS Information

DOL is responsible for enforcement of labor certification violations and violations of U.S. labor laws. DOL has the ability to sanction employers that fail to comply with those laws and DHS has the authority to bar employers from seeking to bring additional foreign laborers to the United States, if they have been found to be violators by DOL. To determine employer violations, DOL reviews what employers are actually doing once the foreign worker is employed versus what they promised to do/or claimed they did at the certification/benefit request stage.

USCIS Use of DOL Information

USCIS uses the information received by DOL to determine immigration benefit eligibility, which is consistent with USCIS' authorities and mission. Receiving information electronically from DOL also allows USCIS to verify the validity of approved labor certifications when

²¹ https://www.foreignlaborcert.doleta.gov/pdf/ETA_Form_9035.pdf

²² <https://www.foreignlaborcert.doleta.gov/pdf/9089form.pdf>

²³ <https://www.foreignlaborcert.doleta.gov/pdf/OMBETAForm9142.pdf>



adjudicating employment-based benefit request forms. It will also assist USCIS in identifying fraudulent labor certification for fraud detection purposes.

Privacy Risk: There is a risk that DOL will use an inaccurate or misinterpreted VIBE Score or Score Result adversely against a benefit requestor.

Mitigation: USCIS mitigates this risk by limiting access to certain DOL employees with training on how to correctly interpret and use the VIBE score and score result. USCIS uses commercial information to provide a basis for a score that assists USCIS in identifying possible fraud concerns or contradictory information submitted by the petitioning entity. DOL uses VIBE data, including the VIBE generated data, to review petition history for certain employers applying for new LCAs and/or labor certification, as well as to verify information supplied by an employer. USCIS provides DOL users training prior to granting access to VIBE on how to interpret and understand the VIBE score as it may pertain to the review of LCAs and/or labor certifications. As part of the training, USCIS instructs DOL on the risk mitigation measures USCIS has implemented when using VIBE.²⁴ Most importantly, USCIS instructs DOL to not solely rely on the VIBE Score and Score Result, but to use the information as tool for further investigation if necessary.

Notice

This PIA Update, which describes the information sharing with CISOMB and DOL, provides notice to public. Additionally, the DHS/USCIS-007 Benefits Information System was updated to include Routine Use X, which permits the sharing of DOL for enforcement of labor certification violations and violations of U.S. labor laws.

Data Retention by the project

The VIBE Retention schedule (DAA-0566-2017-0029) is undergoing the NARA clearance process. USCIS is proposing to destroy records 50 year(s) after an entity, practitioner, or address from a known fraud list is placed into VIBE, or when no longer needed for business reasons, whichever is longer, which mirrors to the retention for the associated records found CLAIMS 3 [DAA-0566-2016-0009]. The proposed 50-year retention schedule for VIBE data provides access to information that can be critical to investigating fraud, criminal activity, egregious public safety, or national security concerns for applicants or petitioning entities who may still be receiving immigration benefits.

Both DOL and CISOMB have read-only direct access to VIBE. DOL and CISOMB will not maintain any VIBE data in their systems. CISOMB can query VIBE Status Reports by entering

²⁴ See DHS-USCIS-PIA-044 Validation Instrument for Business Enterprises (VIBE), available at www.dhs.gov/privacy.



a USCIS receipt number. DOL can query VIBE Status Reports by entering an ETA case number, or an employer's name and FEIN number. VIBE retrieves DOL labor certification data on a daily basis via DaaS and stores that data as a repository to match with USCIS employing data when the employer files employment-based benefit request forms. All VIBE Status Reports and DOL data are stored in the VIBE database and will be retained and disposed of in accordance with the VIBE Retention schedule once approved by NARA.

Information Sharing

With respect to external sharing, DOL and USCIS entered into an information sharing agreement to share labor certification and immigration-related information. USCIS and DOL exchange information through a system to system interface. Through this agreement each agency will provide authorized employees read-only access to the relevant systems. DOL uses the USCIS data to assist in: reviews and adjudications of labor condition and certification applications; program integrity actions (such as business compliance with wage, working conditions, and recruitment requirements, audit examinations, supervised recruitment, debarment, and invalidations); and processing enforcement actions to ensure compliance with required wage payments, working conditions, recruitment activities, and hiring practices.

Privacy Risk: There is a risk that data shared by USCIS with external partners will be used beyond the original purpose of collection (immigration benefits).

Mitigation: USCIS is careful to only share data with external agencies pursuant to a routine use in the Benefits Information System SORN and when the information will be used for a purpose that is compatible with USCIS' mission and SORNs. USCIS documents data safeguards in the MOU and MOA with CISOMB and DOL, respectively. All prospective information handlers must be trained on the uses of the information and authorized to access the information.

Redress

This update does not impact how access, redress, and correction may be sought. USCIS continues to provide individuals with access to their information through a Privacy Act or Freedom of Information Act request. Individuals 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. U.S. Citizens and Lawful Permanent Residents may also file a Privacy Act request to access their information. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS record the request can be mailed to the following address:

National Records Center
Freedom of Information Act/Privacy Act Program



P. O. Box 648010
Lee's Summit, MO 64064-8010

Persons not covered by the Privacy Act or JRA 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.

Auditing and Accountability

USCIS ensures that practices stated in this PIA comply with internal USCIS policies, including the USCIS privacy policies, SOPs, information sharing agreements, orientation and training, rules of behavior, and auditing and accountability. The MOA between USCIS and DOL and MOU between USCIS and CISOMB places limitations on re-dissemination. DOL and CISOMB may share information under their respective information sharing agreements when the recipient has an official need, in accordance with the MOA/U and applicable privacy and confidentiality statutes. The MOA/U clarifies the authority for either DOL or CISOMB to share records and the basic mechanisms established to protect this data. Additionally, USCIS requires that all VIBE users receive training in the use of VIBE prior to being approved for access to the system. USCIS SCOPS provides all CISOMB and DOL users training prior to receiving access to the system.

Responsible Official

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Approval Signature

Original, signed copy on file with the DHS Privacy Office

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