



Privacy Impact Assessment
for the

Benefit Decision and Output Processes

DHS/USCIS/PIA-063

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Abstract

The U.S. Citizenship and Immigration Services (USCIS) mission is to process immigration benefit requests and issue proof of benefits that reflect the status and legality of immigrants and certain nonimmigrants to travel, work, and live in the United States, as well as their status as naturalized U.S. citizens. The proof of benefit is evidence of the adjudication decision made by USCIS, and may be produced on paper, secure paper, booklets, or cards. USCIS also generates notices to its customers to communicate adjudications decisions for which they applied. USCIS uses multiple systems to produce official notices, correspondence, and secure identity documents. USCIS is conducting the Benefit Decision and Output Processes Privacy Impact Assessment (PIA) to evaluate the privacy risks associated with generating official notices, correspondence, and secure identity documents following an immigration status determination or decision by USCIS.

Overview

U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration and non-immigration to the United States and is responsible for the administration of immigration, non-immigration, and naturalization adjudication functions. Throughout the benefit determination process, USCIS communicates with the benefit requestor or legal representative to provide transparency and access to his or her case status.

USCIS also generates applicable notices such as receipts, inquiries (i.e., Request For Evidence (RFE) and Notice of Intent to Deny (NOID)), appointment notices (i.e., biometrics and interviews) and final disposition (i.e., termination, revocation, administrative closure, denial, approval). USCIS consolidates and retains copies of notices sent to the applicant and his or her representative into the Alien File (A-File), Receipt File,¹ or electronic case file.² Final dispositions are also manually recorded in the respective case management system(s).

For certain benefit approvals, USCIS creates secure identification documents for immigrants and certain nonimmigrants as proof of the benefit in support of USCIS's statutory requirement to provide timely evidence of benefits it grants.

USCIS uses a wide variety of Information Technology (IT) systems, databases, and tools that obtain information from USCIS case management systems as part of the benefit decision and output process.³ This PIA discusses the USCIS systems used to generate notices and proof of benefits, and evaluates the privacy risks and mitigation associated with the collection, use, and maintenance of personally identifiable information (PII). Other published USCIS PIAs available

¹ Receipt files are files of immigrant and nonimmigrant benefit applications that USCIS receives.

² USCIS stores notices in an individual's A-File. As USCIS expands its use of electronic collection, USCIS intends to reduce its storage of paper records.

³ See Appendix B for a full list of USCIS case management systems.



on the DHS Privacy Office webpage cover the various case management systems that are used to process immigrant, nonimmigrant, naturalization, intercountry adoption, and requests for asylum and refugee status.⁴ These published PIAs provide an in-depth discussion of the separate processes and systems and evaluate the privacy risks and mitigation strategies built into each process.

Correspondence and Notice of Decisions

Notices are communications indicating that an action has been taken on a request that may or may not require action by the benefit requestor. In accordance with the Immigration and Naturalization Act (INA), USCIS has a statutory obligation to provide a requestor with notice of action USCIS takes related to the request, as well as provide information related to the status of the request.⁵ A notice has a legal effect within USCIS, and conveys information that the individual has a right to know and USCIS has a legal duty to communicate. A notice can be communicated in hard copy or electronically.

USCIS commonly uses numerous types of Form I-797 as notice to communicate with customers or convey an immigration benefit. Specifically, USCIS sends Form I-797, *Notice of Action*, to the benefit requestor in order to communicate information related to notices of:

- Receipt of benefit requests forms and payments,
- Rejection of benefit requests forms,
- Transfer of files,
- Re-open cases, and
- Appointments (i.e., fingerprint, biometric capture, interview, rescheduled).⁶

Form I-797 is sent by USCIS to inform benefit requestors of any actions that they may need to take or actions that have been taken. USCIS Lockbox facilities generate Form I-797 to send notice of receipt or rejection.⁷ USCIS Service Centers use Enterprise Print Manager System (EPMS) to generate Form I-797. USCIS Lockbox or Service Centers print and send the original I-797 receipt and approval notices directly to benefit requestors. Copies of the notices are also sent to legal representatives, if Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, is on file.⁸

USCIS issues RFEs or NOIDs when an application lacks required documentation or the adjudicator needs additional evidence to determine an applicant's eligibility for the benefit sought.

⁴ See USCIS PIAs available at <https://www.dhs.gov/privacy-impact-assessments>.

⁵ 8 U.S.C. § 1103, et seq.

⁶ See Form I-797 available at www.uscis.gov/forms.

⁷ The Lockbox converts the data on paper benefit request form into an electronic format. USCIS uses Lockbox operations to handle fee collection, data entry, and forms processing of selected immigration benefit request forms.

⁸ See Form G-28 available at www.uscis.gov/forms.



The request will indicate what evidence or information USCIS needs to fully evaluate the benefit request. A NOID is a formal statement USCIS issues that it has determined that the applicant is ineligible based on derogatory information uncovered during the course of the adjudication that may not be known to the individual.⁹ USCIS provides the benefit requestor an opportunity for redress, and demonstrate that he or she is eligible. Additional information about the process is specifically discussed in the NOID.

USCIS may use the Enterprise Correspondence Handling Online (ECHO), the Correspondence Generator, or other certificate and correspondence generator systems (included in Appendix A), hereafter referred to collectively as “Correspondence Generator systems,” to streamline the production of official correspondence generated while processing applications for immigration benefits.¹⁰ USCIS field offices use different systems and locally developed applications (LDAs) to develop certificates and correspondence. The LDAs are listed in Appendix A and are covered under the CISNet accreditation boundary (CIS-06191-GSS-06191). CISNet is in the Ongoing Authorization program for continued connectivity. Many Correspondence Generator systems pre-date ECHO. ECHO is matured and fine-tuned to meet all field office business needs, thus USCIS intends to decommission the LDAs and consolidate all uses under ECHO.

The Correspondence Generator systems receive information from the respective case management systems or eCISCOR to automate letter creation for RFEs, NOIDs, Withdrawal, Appeal/Motion Response, Approvals, and Denials using pre-defined templates and standard text.¹¹ The Correspondence Generator systems enhance and streamline USCIS’s processes by providing the adjudicator with a draft document pre-populated with basic biographic information and noted deficiencies to be completed by the adjudicator. Users may also save correspondence in PDF or Microsoft Word format, print the letter for the Alien File (A-File), Receipt File, or electronic case file, and send to the mailroom print queue to be printed and mailed.

Premium Processing Notifications

USCIS expedites processing for certain employment-based petitions and applications who pay an additional fee, known as a Premium Processing Fee. Specifically, USCIS guarantees a 15 calendar day processing to petitioners or applicants who choose to use this service and pay the premium fee.¹² USCIS uses the Automated Premium Processing LAN e-mail System (APPLES)

⁹ See 8 CFR § 103.2(b)(16).

¹⁰ ECHO is a web-based application that allows USCIS Officers the ability to write correspondence to the applicant after he or she has applied for immigration benefits. USCIS Officers can create, modify, export, and print letters from standardized templates, which have been designed for each type of correspondence that a USCIS Officer may need to generate.

¹¹ See DHS/USCIS/PIA-023(a) Enterprise Citizenship and Immigrations Services Centralized Operational Repository (eCISCOR), available at www.dhs.gov/privacy.

¹² If USCIS does not meet the 15 calendar day processing, USCIS will refund the Premium Processing Service fee.



to create and send receipt, approval, and reminder e-mail notices to eligible benefit requestors who requested Premium Processing using the Form I-907, *Request for Premium Processing Service*. APPLES interfaces with Computer Linked Application Information Management System (CLAIMS) 3 to create receipt, approval, and reminder notices.¹³ All other correspondence and notices are sent physically through the United States Postal Service (USPS).

Secure Identity Documents

Once the adjudication is complete, USCIS creates and personalizes various secure identity documents to formalize the decision and provide the benefit recipient with official documentation establishing proof of benefit. The secure identification documents produced and delivered by USCIS are high-quality, tamper-resistant, machine-readable, biometrically-enabled, and incorporate the latest state-of-the-art identification technologies to allow USCIS to combat the threat of counterfeiting, tampering, and fraud. These documents include:

- U.S. Travel Booklet;¹⁴
- Certificate(s) of Naturalization;¹⁵
- Certificate(s) of Citizenship;¹⁶
- Form I-512, Advance Parole;¹⁷
- Form I-551, Permanent Resident Card (PRC);¹⁸
- Form I-766, Employment Authorization Document (EAD);¹⁹
- Form I-327, Permit to Re-enter the United States;²⁰ and

For more information on Premium Processing, please visit: <https://www.uscis.gov/forms/how-do-i-use-premium-processing-service>.

¹³ See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at www.dhs.gov/privacy.

¹⁴ The U.S. Travel Booklet is a multi-purpose booklet that may be issued as either an *I-327, Permit to Re-Enter*, or *I-571, Refugee Travel Document*. When issued as Permit to Re-Enter, it allows the bearer, a permanent resident, to leave and re-enter the United States during its two-year validity. It can be issued as a Refugee Travel Document to refugees or asylees residing in the United States.

¹⁵ A Certificate of Naturalization is issued to those who become naturalized U.S. citizens.

¹⁶ A Certificate of Citizenship is issued to those who derive or obtain U.S. citizenship through their U.S. citizen parent(s) at any time after they are born or those who acquired U.S. citizenship at birth based on having a U.S. citizen parent(s).

¹⁷ USCIS issues advance parole documents solely to authorize the temporary parole of a person into the United States. The document may be accepted by a transportation company (airlines) instead of a visa as an authorization to travel to the United States. An advance parole document does not replace an individual's passport.

¹⁸ The PRC serves as proof of the individual's permanent resident status in the U.S. It also serves as a valid identification document and proof that you are eligible to live and work in the United States. Permanent Resident Cards are commonly known as Green Cards.

¹⁹ An EAD card, known popularly as a "work permit," is a document issued by USCIS that provides its holder a legal right to work in the United States.

²⁰ A Reentry Permit is issued to a legal permanent resident in place of a passport. A re-entry permit allows a



- Form I-571, Refugee Travel Document.²¹

Approved benefit request cases are electronically routed to the following systems for card and travel document production purposes. These systems include:

- **EPMS** supports the printing of notices and documents for CLAIMS 3 and the USCIS Electronic Immigration System (ELIS).²² EPMS uses the Enterprise Service Bus (ESB) to receive print requests from CLAIMS 3 and USCIS ELIS.²³
- **Integrated Card Production System Print Services (ICPS)** prepares, manages, and processes benefit card order requests from internal and external interfacing systems. Card orders are processed by USCIS's high-speed printing equipment. In addition, these systems transmit card production results back to the originating or card requesting system. USCIS personalizes and distributes the EAD and the PRC through a system interface between ICPS and CLAIMS 3.
- **Refugee, Asylum, and Parole System Employment Authorization Document (RAPSEAD)** provides the capability to request and print EAD cards for cases processed using the Refugee, Asylum, and Parole System (RAPS).²⁴ RAPS imports data into the CLAIMS 3.²⁵
- **Travel Document Personalization System (TDPS)** provides the management and printing of travel-related documents for benefits processed using CLAIMS 3.
- **Oath Ceremony Management**, module of Computer Linked Application Information Management System (CLAIMS) 4, is used to print, view, and share naturalization certificate information within USCIS.²⁶

Card Personalization

USCIS has incorporated state-of-the-art technology into the PRCs, EADs, and Travel Documents to deter counterfeiting, obstruct tampering, and facilitate quick and accurate

permanent resident or conditional resident to apply for admission to the United States, upon returning from abroad during the permit's validity, without having to obtain a returning resident visa from a U.S. Embassy or consulate. Permanent or conditional residents should apply for a re-entry permit if they will be outside the United States for one year or more.

²¹ A refugee travel document is issued to a person who has been granted refugee or asylum status, or to a permanent resident who obtained a green card because he or she was a refugee or asylee.

²² See DHS-USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS) available at www.dhs.gov/privacy.

²³ See DHS-USCIS/PIA-008 Enterprise Service Bus (ESB) available at www.dhs.gov/privacy.

²⁴ See DHS-USCIS/PIA-027 Refugees, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS) available at www.dhs.gov/privacy.

²⁵ See DHS-USCIS/PIA-016(a) Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS) 3 available at www.dhs.gov/privacy.

²⁶ See DHS-USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS) 4 available at www.dhs.gov/privacy.



authentication. USCIS uses laser marking technology to personalize the PRC and EAD cards. This system, known as the Card Personalization System Technology Refresh (CPSTR), is comprised of several components that perform various functions necessary to ensure that the cards are successfully marked as they traverse through CPSTR.

Travel Documents are personalized using the TDPS. TDPS is comprised of two pods with four printers in each pod. Each printer is capable of personalizing Travel Documents thereby minimizing the requirement for manual intervention throughout the personalization process.

Once a PRC, EAD, or Travel Document has been personalized, it is checked at a Quality Assurance workstation to ensure that it does not have any print anomalies prior to being marked as complete. The final step in the process consists of the finished cards being attached to personalized inserts and then placed into envelopes, which are then sealed and picked up by USPS for delivery to the recipient or sent via diplomatic pouch to the appropriate Department of State (DOS) Consular Office.

Secure Mail Transport

Previously, cards were personalized and placed into the regular first class mail for delivery. With regular mail delivery, there is no ability to track the mail throughout its route and no confirmation that the personalized card was delivered. USCIS developed the Secure Mail Initiative (SMI), a subsystem of ICPS, which uses the USPS Delivery Confirmation mail service to better track the delivery of cards and travel documents to recipients. As the mail travels through the USPS, the Delivery Confirmation 1D barcode is read and the progress of the mail is recorded in the USPS database.

This partnership has resulted in the successful delivery of millions of secure immigration identity documents to USCIS customers. SMI enables USCIS to confirm delivery of its secure identity immigration documents using USPS tracking information, and enables USCIS customers to easily stay up-to-date on the delivery status of their documents. Information regarding the delivery status of the mailed items is available internally to USCIS personnel via an SMI web site on the USCIS intranet. The current delivery status is also made available to customers through the National Customer Service Center (NCSC)²⁷ and on the Internet via the USCIS Customer Relationship Interface System (CRIS)/Case Status Service Online (CSSO).²⁸

²⁷ See DHS/USCIS/PIA-054 NCSC, available at www.dhs.gov/privacy.

²⁸ See DHS/USCIS/PIA-019(b) Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.



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 INA provides the legal authority for the benefit decision and output process.²⁹ Please see the appropriate SORNs for more specific authorities and citations.

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

The following SORNs cover the collection, maintenance, and use of the information that support the benefit decisions and output process:

- Alien File, Index, and National File Tracking System,³⁰ which covers the collection, use, and maintenance of benefit requests forms and supplemental evidence;
- Benefits Information System,³¹ which covers the collection and use of immigrant and nonimmigrant benefit request forms, decisional data, and associated fees for adjudication;
- Refugee Case Processing,³² which covers the collection and use of refugee applicants, refugee derivatives, and follow-to-join applicants;
- Inter-Country Adoptions Security,³³ which covers the collection and use of adoption forms, decisional data, and associated fees for adjudication;
- Asylum Information and Pre-Screening,³⁴ which covers the collection and use of affirmative asylum applications, applications filed with USCIS for suspension of deportation, special rule cancellation of removal pursuant to the Nicaraguan Adjustment and Central American Relief Act,³⁵ credible fear screening cases,³⁶ reasonable fear screening cases, and asylum follow-to-join applications; and³⁷

²⁹ 8 U.S.C. § 1103 et seq.

³⁰ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (Nov. 21, 2013).

³¹ DHS/USCIS-007 Benefits Information System, 73 FR 56596 (Sept. 29, 2008).

³² Forthcoming Refugee Case Processing SORN.

³³ DHS/USCIS-005 Inter-Country Adoptions Security, 72 FR 31086 (June 5, 2007).

³⁴ DHS/USCIS-010 Asylum Information and Pre-Screening, 80 FR 74781 (Nov. 30, 2015).

³⁵ See Nicaraguan Adjustment and Central American Relief Act, Pub. L. No. 105-100, § 203, 111 Stat. 2193, 2196-200 (1997).

³⁶ See 8 U.S.C. § 1225(b)(1)(B).

³⁷ See 8 CFR § 208.31.



- Biometric Storage System covers the single centralized system that stores all biometric and associated biographic data that USCIS collects.³⁸

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

Yes. SMI and CPSTR are covered as subsystems under ICPS. The ICPS Security Plan was completed on August 21, 2015, and the Authority to Operate (ATO) was issued on July 20, 2014. ICPS is part of the Ongoing Authorization program.³⁹

APPLES, EPMS, RAPSEAD, and TDPS are covered as subsystems under the CLAIMS 3 accreditation boundary. The security plan was completed on August 4, 2015, and the ATO is pending the publication of this PIA. CLAIMS 3 will enter into the Ongoing Authorization program, upon completion of this PIA.

ECHO is covered as a minor system under the Digital Innovation and Development – Information Technology (DID-IT) accreditation boundary. DID-IT completed the security assessment and authorization documentation in March 2015, and was accepted into the Ongoing Authorization program, however DID-IT privacy compliance requirements remain in progress.

Correspondence Generator is covered as a minor system under the U.S. Citizenship and Immigration Services Network (CISNet) accreditation boundary. CISNet completed the security assessment and authorization documentation in January 2016, and was accepted into the Ongoing Authorization program.

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

Yes. Card production data is retained for 10 years.

Correspondence produced by APPLES and RAPSEAD is scheduled under the CLAIMS 3 retention schedule [N1-566-08-12]. USCIS is proposing to expand the CLAIMS 3 retention schedule from 15 years to 50 years from the date of the last completed action. USCIS retains this information to maintain a complete and accurate history of an individual's immigration interaction with USCIS for future benefit requests. This expanded 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, and to FOIA/PA matters. Expanding the records retentions schedule allows for USCIS to provide as much information as permitted to the individual regarding his or her immigration history. USCIS also continues to update CLAIMS 3 as individuals

³⁸ DHS/USCIS-003 Biometric Storage System, 72 FR 17172 (Apr. 6, 2007)

³⁹ Ongoing Authorization requires any participating system to be reviewed on a monthly basis to maintain its security posture and ATO.



file immigration benefits with the agency to ensure that the information is accurate and complete while maintaining a historical record of interactions with USCIS and benefit status changes.

TDPS is a non-record, therefore, not requiring a retention schedule.

USCIS has drafted and submitted a retention schedule to collectively cover the correspondence generator systems (e.g., ECHO and Correspondence Generator) and EPMS. USCIS is proposing to retain these records for 10 years from the date of when the records were created.

Outputs and decisions are stored in the A-File, Receipt File, or electronic case file [N1-566-08-11]. A-File records are permanent, whether hard copy or electronic. DHS transfers A-Files to the custody of NARA 100 years after the individual's date of birth. The majority of customer data in USCIS ELIS is not yet covered by a finalized retention schedule, but is pending review at the National Archives. USCIS expects NARA to approve permanent retention for USCIS ELIS customer data because it replaces data that would have been in the A-File if filed via paper.

Physical outputs that are sent to the benefit requestor and are returned to USCIS [DAA-0566-2014-0005] are retained by USCIS for up to one year.

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.

Benefit outputs are not covered by the PRA as they are generated internally by USCIS. For a full description of PRA-covered information collections used during the benefits intake process, please see the USCIS Benefit Request Intake Process PIA.⁴⁰

Section 2.0 Characterization of the Information

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

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

USCIS generates and mails notices and secure identification documents to communicate adjudication actions and decisions to the mailing address on file for the benefit requestor or his or her legal representative.

⁴⁰ DHS/USCIS/PIA-061 Benefit Request Intake Process (March 15, 2016), available at www.dhs.gov/privacy.



USCIS includes the following information on the Form I-797:

- Name;
- Form Number;
- A-Number;
- Mailing Address;
- Receipt Number;
- Case Type;
- Beneficiary (if applicable); and
- Action Type (e.g., Application Support Center Appointment Notice, Receipt Notice).

The following information about the individual is printed on correspondence and decision notices (i.e., receipt, appointments, approval, RFE, NOID, and denials):

- A-Number;
- Receipt Number;
- Full Name;
- Full Mailing Address;
- Attorney's Firm Name, if applicable;
- Attorney's Full Mailing Address, if applicable;
- Form Number;
- Date of Birth;
- Gender;
- Marital Status;
- Country of Birth; and
- Narrative Explaining Case Information.

The following information about the individual is printed on the PRC card:

- Full Name;
- A-Number;
- Gender;



- Country of Birth;
- Date of Permanent Resident;
- Port of Entry or office where the individual was granted adjustment of status;
- Card Expiration Date;
- Fingerprint;
- Photograph;
- Radio Frequency Identification data (RFID) Chip, which contains a small amount of data⁴¹ and no personal information;
- 1D Barcode⁴²; and
- Digital Signature.

The following information about the individual is printed on the EAD card:

- Full Name;
- A-Number;
- Gender;
- Date of Birth;
- Country of Birth;
- Card Number;
- Card Validity and Expiration Date;
- Fingerprint;
- Photograph;
- 1D Barcode; and
- Digital Signature.

⁴¹ The fingerprint image is laser engraved on the card. The RFID in USCIS cards is not a chip like in typical smart cards. The USCIS identity cards have an RFID antenna and are only a pointer to the electronic record, such as within TECS, when a card is presented at a port of entry. The RFID antenna is read and the system is queried to pull up the record of the person. The USCIS identity cards are designed based off internationally recognized standards, one of which is the International Civil Aviation Organization (ICAO), specifically ICAO 9303 – Part 3 (http://www.icao.int/publications/Documents/9303_p3_cons_en.pdf).

⁴² Identifying information such as Social Security numbers (SSN), A-Number, ethnicity, race, eye color, hair color, weight, is included in a 1D barcode and is only machine-readable.



The following information about the individual is printed on the Permit to Re-enter the United States card:

- Full Name;
- Gender;
- Date of Birth;
- A-Number;
- Country of Nationality;
- Immigration Status;
- Book Number;
- Date of Expiration;
- Date of Issue;
- Photograph;
- 1D Barcode; and
- Digital Signature.

The following information about the individual is printed on the Refugee Travel Document card:

- Full Name;
- Gender;
- Date of Birth;
- A-Number;
- Country of Nationality;
- Book Number;
- Immigration Status;
- Date of Expiration;
- Date of Issue;
- Photograph;
- 1D Barcode; and
- Digital Signature.



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

Most of the information used to generate notices and secure identity documents is derived from the data provided by the benefit requestor, accredited representative, form preparer, or interpreter on the completed benefit request form. USCIS collects biometric information (i.e., photograph, fingerprint, and signature) directly from benefit requestors at an authorized USCIS fingerprint capture location to conduct background checks. Other information regarding the benefit is generated by USCIS personnel, and included in the correspondence and secure identity documents.

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 ensures data accuracy by collecting biographic and biometric information directly from the benefit requestor, accredited representative, form preparer, or interpreter. USCIS also biometrically verifies the accuracy of the information provided through the background check process. Biometric verification is an identity authentication process used to confirm a claimed identity through uniquely identifiable biological traits. The print facilities also perform Quality Assurance to ensure the cards match the information within the system. Generated notices and secure identity documents are reviewed for accuracy prior to being mailed to the benefit requestor or his or her representatives.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk to data security and integrity that USCIS prints images of biometrics directly on identity documents.

Mitigation: Documents produced and delivered are high-quality, tamper-resistant, machine-readable, biometrically-enabled and incorporate the latest state-of-the-art identification technologies to allow USCIS to keep ahead of the threat of counterfeiting, fraud, and tampering. However, if a benefit requestor attempts to create a false secure identity document or use one that does not belong to him or her, USCIS is trained to detect and deter fraud by recognizing fraudulent immigration documents as well as detecting impostors. Furthermore, if the benefit requestor loses the secure identity document or has it stolen, the benefit recipient is encouraged to contact the USCIS customer service call center to report it. USCIS also encourages the benefit recipients to



apply for a replacement card. If a card is reported lost, USCIS will deactivate the existing card, and will make the appropriate system updates to note that the recipient is no longer in possession of it.

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 the correspondence handling and generating systems to standardize and streamline the writing of official correspondence generated while processing applications for immigration benefits. USCIS Officers create these letters using standard templates and export (in PDF or Microsoft Word format), modify, organize, format, and print them and send them to the benefit requestors and legal representatives.

USCIS also uses the card production tool systems to generate and personalize a variety of secure identification documents for immigrants and certain non-immigrant aliens in support of USCIS' statutory requirement to provide timely evidence of benefits. USCIS prints and mails secure identification documents to the benefit requestors and provide a copy of the accompanying notice to the legal representatives.

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?

Yes. ICPS sends card document production information on a daily basis to U.S. Customs and Border Protection (CBP) and the Office of Biometrics and Identity Management (OBIM) Automated Biometric Identification System (IDENT) via the ESB2.⁴³ This includes photo, signature, press-print, A-Number, Receipt Number, Document Issuance Data, and RFID associated with the EAD and the PRC. The data transfer in this interface is unidirectional.

⁴³ See DHS/NPPD/PIA-002 Automated Biometric Identification System available at www.dhs.gov/privacy.



CBP has technology in place at all ports-of-entry to read RFID enabled documents, including the USCIS identity cards.⁴⁴ Individuals provide travel documents to CBP upon entry into the United States. CBP then reads the RFID in the card when the cardholder approaches a border entry point and retrieves information about the individual from TECS.⁴⁵ This process provides CBP additional efficiencies in quickly processing border entries. All CBP Officers at ports-of-entry are currently trained in the use of this technology.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that USCIS may inadvertently send correspondence or secure identity documents to the wrong address and recipient.

Mitigation: USCIS sends correspondence or secure identity documents to the address on file for the benefit requestor or his or her representative. All non-U.S. citizens who are required to be registered are also required to keep USCIS informed of their current address. This is particularly important when a benefit requestor has filed a benefit request form for a benefit under INA and expects notification of a decision on that benefit request form. In addition, USCIS may need to contact the benefit requestor to provide other issued documents or return original copies of evidence.

Furthermore, pursuant to Section 265 of the INA, 8 U.S.C. § 1305, nearly all non-U.S. citizens are required to report a change of address within 10 days of moving by submitting an electronic or paper Form AR-11 to USCIS. Failure to report a change of address may result in a fine, imprisonment, or removal.⁴⁶ Failure to comply could also jeopardize the individual's ability to obtain a future visa or other immigration benefits. In the event sensitive information is inadvertently disclosed, USCIS notifies the individual by written notification and may offer credit monitoring services.

Finally, USCIS developed SMI, which uses USPS Delivery Confirmation mail service to better track the delivery of cards and travel documents to recipients. As the mail travels through the USPS, the Delivery Confirmation 1D barcode is read and the progress of the mail is recorded in the USPS database. This partnership has resulted in the successful delivery of millions of secure immigration identity documents to USCIS customers. SMI enables USCIS to confirm delivery of its secure identity immigration documents using USPS tracking information, and enables USCIS customers to easily stay up-to-date on the delivery status of their documents.

⁴⁴ The USCIS identity cards have an RFID antenna and are only a pointer to the electronic record, such as within TECS, when a card is presented at a port of entry. The RFID antenna is read and the system is queried to pull up the record of the person. The USCIS identity cards are designed based off internationally recognized standards, one of which is the International Civil Aviation Organization (ICAO), specifically ICAO 9303 – Part 3 (http://www.icao.int/publications/Documents/9303_p3_cons_en.pdf).

⁴⁵ See DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing (TECS), available at www.dhs.gov/privacy.

⁴⁶ See DHS/USCIS/PIA-018 Alien Change of Address Card (AR-11), available at www.dhs.gov/privacy.



Privacy Risk: There is a risk that USCIS may forward correspondence to a legal representative without a valid G-28 or severed attorney-client relationship.

Mitigation: USCIS respects valid G-28s in all filings. In such cases, rejected benefit requests are returned to the legal representative on file, rather than the benefit requestor. USCIS sends receipt notices for all filings to the G-28 attorneys, in addition to the benefit requestor. However, if USCIS receives benefit requests with G-28s that are not valid (e.g., if the form was not signed by the representative), USCIS will not honor the G-28 and all further correspondence is sent to the benefit requestor. In the event the benefit requestor severs the relationship with his or her legal representative, USCIS requires the benefit requestors to notify USCIS that the legal representative has changed or that the benefit requestor is no longer represented by anyone.

Privacy Risk: There is a risk that USCIS stores more information than is necessary in the 1D barcode on the notices and identity documents.

Mitigation: USCIS partially mitigates this risk. As part benefit adjudication process, USCIS issues appointment letters to the individual and/or his or her representative. USCIS prints limited benefit requestor contact information directly on the appointment notice. The appointment letter also includes a 1D barcode which includes other identifying information (such as Social Security numbers (SSN), A-Number, ethnicity, race, eye color, hair color, weight). USCIS safeguards this information by storing the identifying information within, the barcode which is machine-readable only.⁴⁷

The PII included in the barcode including the SSN, is necessary to confirm that the individual, the identification he or she presents, and information in the system matches. If this information was not included, it may lead to USCIS capturing biometrics for the wrong person, which would eventually lead to data quality issues. Furthermore, Immigration and Nationality Act 264(f) (8 U.S.C. 1304(f)) provides the Secretary of Homeland Security with the specific authority to collect and use SSNs during the immigration benefit process. The SSN is an irreplaceable piece of information that is used to verify identity, because a SSN is an identifier that is unique to each individual.

⁴⁷ A Livescan scanner is used to read the information in the barcode, and auto-populates into Livescan, which is used to capture biometric and biographical information from applicants at the ASC and internationally. Livescan refers to both the technique and technology used to capture fingerprints. Livescan fingerprinting is the process of capturing fingerprints electronically with an advanced Livescan machine. This technique and technology is widely used across the Federal Government and state and local law enforcement agencies. USCIS's Livescan software was configured to specifically read the barcodes, populate the screen with the relevant information, and send the biometric and biographic information to OBIM and FBI for background checks.



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 through the publication of this PIA and the associated SORNs in Section 1.2 of this PIA. Additionally, the instructions for each benefit request form contain a Privacy Act Statement. Each Privacy Act Statement 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. The form instructions also inform the benefit requestor that USCIS may communicate with the individual through written communication.

During the benefit adjudication process, individuals are able to check the status of their benefit request form through the CRIS/CSSO.⁴⁸ CRIS/CSSO provides customers with pending case status information and estimated processing times, including whether a notification or secure identity documents was issued. If individuals do not receive their correspondence or secure identity document within a timely manner, USCIS advises the benefit requestor contact NCSC.

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

The submission of a benefit request is voluntary. USCIS requires individuals to complete the benefit request form, provide supplemental evidence, and pay the associated fee, if not waived. If more information is required, then USCIS may issue written notices to the individual (i.e., biometric appointment, request of evidence, interview). This information is critical for USCIS to accept and process forms to grant or deny an immigration benefit, ultimately producing secure identification documents. Failure to provide the requested information may prohibit USCIS from processing and properly adjudicating the benefit request form and thus precludes the benefit requestor from receiving the benefit.

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk associated with notice because USCIS provides notice at the point of information collection directly from benefit requestors. USCIS provides notice to individuals through a Privacy Act Statement, this PIA, and the associated SORNs. Individuals are also able to

⁴⁸ See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS) and subsequent updates *available at* www.dhs.gov/privacy.



check the status of their benefit requests online via CRIS/CSSO or contact a USCIS customer service call center.

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.

NARA approved the ICPS retention schedule [N1-566-09-01], which retains card production data for 10 years.

Correspondence produced by APPLES and RAPSEAD is scheduled under the CLAIMS 3 retention schedule [N1-566-08-12]. USCIS is proposing to expand the CLAIMS 3 retention schedule from 15 years to 50 years. USCIS retains this information to maintain a complete and accurate history of an individual's immigration interaction with USCIS for future benefit requests. This expanded 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, and to FOIA/PA matters. Expanding the records retentions schedule allows for USCIS to provide as much information as permitted to the individual regarding his or her immigration history. USCIS also continues to update CLAIMS 3 as individuals continue to file immigration benefits with the agency – ensuring that the information is accurate and complete while maintaining a historical record of interactions with USCIS and benefit status changes.

TDPS is a non-record, therefore, it does not require a retention schedule.

USCIS has drafted and submitted a retention schedule to collectively cover the correspondence generator systems (e.g., ECHO and Correspondence Generator) and EPMS. USCIS is proposing to retain these records for 10 years from the date of when the records were created.

Outputs and decisions are stored in the A-File, Receipt File, or electronic case file [N1-566-08-11]. A-File records are permanent, whether hard copy or electronic. DHS transfers A-Files to the custody of NARA 100 years after the individual's date of birth. The majority of customer data in USCIS ELIS is not yet covered by a finalized retention schedule, but is pending review at the National Archives. USCIS expects NARA to approve permanent retention for USCIS ELIS customer data because it replaces data that would have been captured and stored in the A-File if filed via paper.

Physical outputs that are sent to the benefit requestor and are returned to USCIS [DAA-0566-2014-0005] are retained by USCIS for up to one year.



5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that USCIS may retain the same information for different periods of time depending on the storage format.

Mitigation: USCIS partially mitigates this risk. USCIS may store notices in the correspondence generator system or case management system used to create the notice, as well as the paper and/or electronic A-File. USCIS created a retention schedule for the correspondence generator systems which is separate from the case management system retention period. USCIS determined that there isn't an operational need to retain notices created in the correspondence generator systems for longer than 10 years. However, USCIS retains all information within the case management systems – including the notices – for a longer period of time to address any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, and to FOIA/PA matters. Ultimately, a copy of the notice is generally stored in either the physical or electronic A-File regardless of where the notice was created (correspondence generator system vs. case management system). The A-File is the official record of USCIS, which is maintained for permanently, regardless of whether the A-File is in physical or electronic format. USCIS transfers A-Files to NARA 100 years after the individual's date of birth.

Although there is always an inherent risk with retaining data for any length of time, data retention periods for the associated systems are consistent with the concept of retaining data to maintain a complete and accurate history of an individual's immigration interaction with USCIS for future benefit requests.

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.

As part of SMI, USCIS uses USPS Priority Mail® with Delivery Confirmation services. The SMI system serves as a centralized, automated solution for communicating with the USPS to track the mailing of USCIS secure identity documents, to receive USPS delivery status information on a daily basis, and to make the delivery status information available to USCIS personnel and customers as needed.



The USCIS Document Production Facility produces the secure identity documents, assigns a USPS tracking number to each item to be mailed, prints a barcoded label with the tracking number for each mailing envelope, and tenders the batch of items produced each day to the USPS for mailing. As part of this process, the facility produces a Shipping Services File (in a defined USPS format) that contains information on the mailed items in the daily batch. This file is manually uploaded each day to the SMI.

After items are mailed, the SMI receives delivery status information via predefined scan events in USPS Extract Files downloaded each day by SMI from a USPS server. The SMI reads the files, matches each scan event to a previously mailed item, and stores data for any change of delivery status in the database. Key information retained for each scan event is the USPS tracking number, scan event code, scan event date/time, and scan event location (i.e., city, state and ZIP code). The scan event code identifies USPS events, such as “picked up by USPS,” “processed at a USPS facility,” “delivered to addressee,” and “returned to sender.” USCIS does not transfer the mailing address and name to USPS. For changes in delivery status, SMI updates a record in the CRIS for subsequent display of the latest delivery status information in USCIS CSSO.

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

USCIS shares a limited amount of information with USPS for the purpose of enabling USPS mission requirements. USCIS is required to collect fees, adjudicate benefit request forms, and provide timely evidence of the approved benefit. As part of normal operating procedures, USCIS contracts with USPS to serve as a courier service to transport and deliver secure identity documents to the recipient.

6.3 Does the project place limitations on re-dissemination?

Yes. The USPS is restricted from sharing customer or mailing information by the Postal Reorganization Act, Title 39 of the United States Code (U.S.C.). Under 39 U.S.C. 412, the USPS cannot make available to the public, by any means or for any purpose, any mailing or other list of names or addresses (past or present) of customers or other persons, unless specifically permitted by statute.

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

SMI is responsible for tracking and maintaining an inventory of shipped mail.



6.5 Privacy Impact Analysis: Related to Information Sharing

There is no privacy risk associated with information sharing because USCIS does not share the written correspondence or secure identity documents with external entities. USPS's basic function is to provide prompt, reliable, and efficient postal services to patrons.

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?

USCIS gives benefit requestors numerous opportunities during and after the completion of the benefit request process to update and correct information they have provided and to respond to information received from other sources. In addition, USCIS provides all benefit requestors an opportunity to refute benefit determinations during the in-person interview process.

An individual may gain access to his or her USCIS records by filing a Privacy Act request. If an individual would like to file a Privacy Act request to view his or her USCIS record, he or she may mail the request to the following address:

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

Further information about Privacy Act and FOIA requests for USCIS records is available at <http://www.uscis.gov>.

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

Individuals should submit requests to contest or amend information as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. 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.



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 the USCIS website. Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. 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.

7.4 Privacy Impact Analysis: Related to Redress

There is no risk associated with redress in relation to the Benefit Decision and Output PIA. USCIS provides individuals with access 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 USCIS policies, including the USCIS privacy policies, standard operating procedures (SOPs), orientation and training, rules of behavior, and auditing and accountability.

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 user 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. 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.

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.

Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security



Appendix A

Other Certificate and Correspondence Generator Systems

In certain instances, USCIS offices will use Locally Developed Applications (LDAs) to generate correspondence sent to benefit requestors. In order to generate the correspondence, the LDAs extract data through a direct connection with the case management systems or the Enterprise Citizenship and Immigration Services Centralized Operation Repository (eCISCOR). The LDAs do not store the letters, forms, or data used to generate the letters it is maintained in the source system. The copy of the correspondence sent to the benefit requestor is placed in the applicant’s A-File and is kept in accordance with approved NARA schedule.

LDA Name	USCIS Office	System Description	Elements of PII
Canned Reports	National Benefits Center (NBC)	The database is used by the USCIS Records Office to respond to applicants’ requests for specific information to produce and print letters using letter templates. It is also used to track the quantity of letters produced.	Applicant name, address, File Control Office (FCO), if applicable, A-Number, and receipt number
Adjustment of Status (AOS) Evidence and Evidence Adjudicator	NBC	The database supports AOS (I-485) applications. NBC uses the LDA to generate letters to the benefit requestor for missing evidence that may or may not have been generated from the Process Checklist and provides the ability to reprint Request for Evidence (RFE) letters.	Receipt numbers
Letter Generator	NBC	The database is used to: <ul style="list-style-type: none"> produce resolution memos to resolve National Crime Information Center (NCIC) TECS hits; generate correspondence to benefit requestors; generate decisional letters to benefit requestors/attorneys; 	Applicant’s name address, A-Number, and receipt number, and filing dates



		<ul style="list-style-type: none"> • generate RFEs for benefit requestors/attorneys; and, • generate memos to track location of the file. 	
Reprint I-687 Appeal Letters	NBC	The database is used to reprint letters that retroactively notify applicants of appeal rights granted.	A-Number, receipt number, and applicant's name
NSC AR-11 Form	Nebraska Service Center (NSC)	The database is used to generate letters (RFEs, Denials, Withdrawals, Abandonments, NOIDs, etc.) and for reporting. It is the Front End/User interface to Letters Express Admin (LEA), described below.	Applicant's name, address, and A-Number
N-600 & N-565 Certificate Issuance	NBC	The database is used to manually create N-600 certificates that are not in CLAIMS 4.	Applicant's name, A-Number, gender, date of birth, country of birth, height, marital status, city, state, name that the certificate was issued under, date derived/acquired citizenship, and the date the certificate is issued
Certz	Cleveland Field Office (CLE)	To prepare Naturalization & Citizenship certificates manually	Applicant's name, date of birth, A-Number, certificate number for replacements, nationality, marital status, gender, addresses
N-600 & N-565 Certificate Issuance	Harlingen Field Office (HLG)	The database is used to manually create N-600 certificates that are not in CLAIMS 4.	Applicant's name, A-Number, gender, date of birth, country of birth, height, marital status, city, state, name that the certificate was issued under, date derived/acquired citizenship, and the date the certificate is issued
N-600 & N-565 Certificate Issuance	Indianapolis Field Office (INP)	Access database used to print certificates for N-600 and N-565 applications	Applicant's name, A-Number, gender, date of birth, country of birth,



			height, marital status, city, state, name that the certificate was issued under, date derived/acquired citizenship, and the date the certificate is issued
Certificates	Portland Field Office (POM)	This application is used to print Naturalization and Citizenship certificates.	A-Number, date of birth, country of birth, applicant full name, address (city, state), gender, height, marital status, date of citizenship, and date certificate issued.
Abandonment Withdrawal Generator	California Service Center (CSC)	Used by CSC to generate abandonment or withdrawal letters to send to the benefit requestors.	Receipt number, name, address, attorney
Print Approval Notice	CSC	Extracts data from CLAIMS 3 to generate Approval Notice for Commonwealth of the Northern Mariana Islands (CNMI) cases that have not been set up to print out in CLAIMS 3.	Receipt number and name
RFE Auto Generator	CSC	Used to create letters to send to the applicants.	Receipt number and name
H2B (Temporary Worker Program) Database	Vermont Service Center (VSC)	The application is used to print labels for rejection letters sent for applications received after a particular visa cap has been reached.	Name, address, and receipt numbers.
Interim Case Management System RFE	Baltimore Field Office (BAL)	Generates paper notices to benefit requestors with barcodes and proper date to respond. When applicant submits evidence, notice barcode is scanned to show evidence received. Each RFE has an instruction sheet. Imports data from MailTrak LDA and Attorney Trak LDA, described below.	Name, Address, A-Number.
Remote Online Printing Executive	VSC	The application is used to generate correspondence related to processing I-751, Petition to	Name, Address, Receipt Number, and A-Number.



System (ROPES)		Remove Conditions on Residence.	
NATZ Cert	Texas Service Center (TSC)	The database is used for printing naturalization/citizenship/special certificates. Extracts information from CLAIMS for N-565 case types for the purpose of producing the replacement Naturalization Certificate, Citizenship Certificate, or Special Certificate.	A-Number, date of birth, sex, height, marital status, country of nationality, full name, full address
NSC Letters Express	NSC	The database is used to generate letters (RFEs, Denials, Withdrawals, Abandonments, NOIDs) and for reporting. It is the Front End/User interface to Letters Express Admin (LEA), as described below.	A-Number, name, receipt number, employee name
FDNS - Public Safety Letters	NBC	Generate Request to Investigate letters.	A-Number, DOB, Place of birth, Name, Address, FBI #, State ID #, Gender, Subject (beneficiary/ applicant)
Void Certificate Log	Pittsburgh Field Office (PIT)	Excel spreadsheet that maintains a list of voided Certificates.	Name
Vermont Background Database (VBDB)	VSC	Used by the Background Check Unit to create resolution memos as required by the USCIS National Background Identity and Security Check Operating Procedures (NBISCOP). The resolution memo is an internal memo that documents the determination of whether an individual may or may not be considered a national security threat.	Name, DOB, address, Receipt number, A-Number
Baltimore Advanced Parole System (BAPS)	Baltimore Field Office (BAL)	Used to support the adjudication and printing of I-512, Advanced Parole documents. Information is manually entered in and kept for	Agency Address; A-Number; Attorney/Representative; Country of Birth;



		preservation.	Country of Citizenship; Date of Birth; Full Name; Nationality; Street Address; Telephone number
USL (1 USC parent, 1 LPR parent) Public Safety	NSC	The database provides a method to create a response memo to positive FBI check. The memo is provided to the Benefit Fraud Unit and ICE or file	Name, address, A-Number, DOB, Place of birth, and gender
Letters Express Admin	NSC	Back end database for NSC Letters Express (LE) and AR-11 LDA. Creates and holds templates, stores final letters and is used to make changes.	A-Number, name, receipt number, employee name, username.



Appendix B

USCIS Case Management System PIAs:

- Forthcoming **Adoption Case Management System (ACMS)**, which is used to process intercountry adoption applications and petitions.
- **Computer Linked Application Information Management System (CLAIMS 4)**, which is used to process citizenship and naturalization application.⁴⁹
- **CLAIMS 3**, which is used to manage 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.⁵⁰
- **Refugee, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS)**, which is used to process affirmative asylum applications, applications filed with USCIS for suspension of deportation, special rule cancellation of removal pursuant to the Nicaraguan Adjustment and Central American Relief Act, credible fear screening cases, and reasonable fear screening cases.⁵¹
- **Case and Activity Management for International Operations (CAMINO)**, which facilitates the processing of immigration applications and petitioners received by International Operations.⁵²
- **USCIS Electronic Immigration System (USCIS ELIS)** is an electronic case management system that allows USCIS to process certain immigration benefit requests.⁵³

⁴⁹ See DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), available at www.dhs.gov/privacy.

⁵⁰ See DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System and Associated Systems (CLAIMS 3), available at www.dhs.gov/privacy.

⁵¹ See DHS/USCIS/PIA-027 Refugee, Asylum, and Parole System (RAPS) and the Asylum Pre-Screening System (APSS), available at www.dhs.gov/privacy.

⁵² See DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), available at www.dhs.gov/privacy.

⁵³ See DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at www.dhs.gov/privacy.