Privacy Impact Assessment
for the

Center Adjudication System Electronic Processing (CasePro)

DHS/USCIS/PIA-040

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) developed the Center Adjudication System Electronic Processing (CasePro) system to assist with the adjudication of Temporary Protected Status (TPS), Deferred Enforced Departure (DED), and Deferred Action for Childhood Arrivals (DACA) filings. CasePro electronically organizes and reviews incoming filings, identifies approvable cases, automates the adjudication of some cases which meet filing requirements, and routes filings requiring additional review to the manual resolution process. USCIS is conducting this Privacy Impact Assessment (PIA) to describe how CasePro collects, uses, and maintains personally identifiable information (PII).

Overview

USCIS is the component of DHS that oversees lawful immigration to the United States. USCIS receives and adjudicates petitions and applications for immigrant and immigrant-related benefits. Specifically, the USCS Vermont Service Center (VSC) is responsible for the administration and adjudication of TPS, DED, and, since August 2012, DACA filings.

VSC experienced a significant increase of TPS and DED filings causing processing delays prior to the implementation of CasePro system. The adjudication of these benefits was a manual process, which was time-consuming, and limited the number of cases an adjudicator was able to complete on a daily basis. By automatically processing, CasePro streamlines the adjudication process for TPS, DED, and DACA filings, increases the speed and accuracy of benefit decisions while improving customer satisfaction and significantly reducing the case processing times.

CasePro automates the processing of TPS and DED filings using system-qualified adjudication (SQA). SQA automates the benefit administration processes by (1) identifying the benefit sought; (2) verifying applicant information; (3) validating eligibility for benefits; (4) automating fingerprint and biometric appointment scheduling and validating the identity of the applicant based on results; (5) gathering names for TECS checks,[1] submitting for processing and confirming results; and (6) performing a review of inadmissibility responses based on criteria outlined by the TPS and DED programs. Each case is evaluated to determine if it meets all eligibility criteria. Cases that meet the criteria are batched for quality review by the VSC Quality Assurance Division prior to noting approval in Computer Linked Adjudication Information Management System (CLAIMS 3). Cases that do not meet the eligibility criteria are batched for officer adjudication.

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[1] See DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing for more information on TECS, available at www.dhs.gov/privacy.

CasePro is also used to pre-process DACA filings by verifying the applicant's identity through automating fingerprint and biometric and gathering names for TECS checks, submitting those names for processing, and confirming the results.

Forms to File for TPS, DED, and DACA

An individual seeking TPS, DED, or DACA status must submit a request to USCIS by completing the form or forms associated with the status he or she is requesting, along with the mandatory employment authorization form. These forms include:

- Form I-821, *Application for Temporary Protected Status,* used by individuals applying for a temporary immigration status for eligible nationals of designated countries through either TPS.

- Form I-821D, *Consideration of Deferred Action for Childhood Arrivals,* used to request that USCIS consider deferring action, using the guidelines set forth by the Secretary of Homeland Security in the memorandum, *Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children*, published on June 15, 2012.[2]

- Form I-765, *Application for Employment Authorization*, used to apply for employment authorization for reasons seeking TPS, DACA and DED status.

These forms are entered in CLAIMS 3 for processing.

CasePro Information Technology System

CasePro electronically retrieves pending TPS, DED, and DACA cases assigned to the VSC from Citizenship and Immigration Services Centralized Oracle Repository (CISCOR).[3] CasePro also electronically retrieves an applicant's application and immigration history, and pre-processes the applications by pulling together fingerprint results, related Alien Numbers (A-Number), and aliases, and the required security checks. CasePro then validates the information against predefined adjudication requirements to flag eligibility concerns or identify approvable filings. All final decisions are updated in CLAIMS 3 using WIN765[4], via a barcode generation process.

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[2] Please see DHS/USCIS/PIA-045 Deferred Action for Childhood Arrivals PIA for more information on requests for consideration of deferred action for childhood arrivals, available at www.dhs.gov/privacy.
[3] Please see DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) for more information on CISCOR, available at www.dhs.gov/privacy.
[4] WIN765 is an application developed by the Texas Service Center for batch updates in CLAIMS 3. Bar codes are generated for an application and then the bar codes are scanned to transmit the status of the application into CLAIMS 3.

Approval Process for TPS, DED, DACA

The approval process for TPS, DED, and to some extent, DACA filings, consists of three steps: (1) application retrieval process, (2) eligibility verification process, and the (3) adjudication decision service.

Application Entry Process

The application entry process begins when an applicant submits completed TPS, DED, or DACA forms in hardcopy to a USCIS Lockbox facility[5] or online through the Electronic Filing system.[6] The majority of applications come through the Lockbox process. When USCIS receives a file through the Lockbox process, the filing package is reviewed for completeness, intaking the payment of required fees, or a properly documented fee waiver/exemption request. If the filing meets the threshold acceptance criteria, a notice is sent to the applicant that contains a receipt number, which can be used to check the case status online. The hard copy application is digitized by contract employees and data entered into CLAIMS 3. CLAIMS 3 data is replicated in the Citizenship and Immigration Services Centralized Oracle Repository (CISCOR), the database that consolidates the data from USCIS's five CLAIMS 3 service center local area networks (LAN). The CISCOR database is essentially a mirror image of the CLAIMS 3 LAN information and is used for a variety of functions to support CLAIMS 3 adjudications.[7]

Further, hard copy applications that are deemed inadmissible, are transmitted electronically to the VSC through a platform called the Enterprise Service Bus (ESB).[8] All filings are consolidated into the applicant's Alien File (A-File)[9] and/or digitized A-File.[10]

CasePro interfaces with CISCOR to identify and extract pending TPS, DED, and DACA cases. CasePro will also identify other cases from CLAIMS 3 that share the same A-Number, allowing the system and/or an adjudicator to view the action(s) taken on those cases (i.e.,

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[5] Lockbox facilities are operated by a financial agent authorized by the Department of Treasury. This financial agent manages the intake of USCIS applications, petitions and requests and the collection of associated fees submitted directly by mail. For more information regarding the Lockbox services, please see the Department of Treasury Electronic Check Processing PIA, available at http://www.fms.treas.gov/pia/ECP_PIA.pdf and the accompanying system of records notice, Treasury/FMS.017 - Collections Records -Treasury/Financial Management Service, May 15, 2009 (74 FR 23019) available at http://www.treasury.gov/FOIA/Pages/fmspa.aspx.

[6] Please see the DHS/USCIS/PIA-024 - Electronic Filing System (e-Filing) PIA more information pertaining to the electronic filing of USCIS applications, available at www.dhs.gov/privacy.

[7] Please see the DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) for more information on CISCOR, available at www.dhs.gov/privacy.

[8] Please see the DHS/USCIS/PIA-008 - Enterprise Service Bus (ESB) for more information, available at www.dhs.gov/privacy.

[9] "A-Files" are a series of records consisting of numbered files prefixed with an "A" used to document the complete history of USCIS's interaction with an individual as prescribed by the Immigration and Nationality Act, prior laws, and other regulations. The records include various forms, correspondence, pre-existing files related to or supplied by the individual, and documentation supporting action considered by USCIS or its predecessor agencies.

[10] USCIS may digitize an A-File in response to an email request sent to the National Records Center (NRC). The NRC provides electronic access to the A-file in EDMS. See, DHS/USCIS/PIA-003 - Integrated Digitization Document Management Program, January 5, 2007, available at www.dhs.gov/privacy.

approved, denied, still pending). The extracted PII from either Form I-821or Form I-821D is then compared to the PII from the Form I-765. CasePro matches the two related forms based on the CLAIMS 3 information. Once this step is complete, the filing proceeds to the eligibility verification process.

Application Verification Process

To perform these functions, CasePro interfaces and extracts PII from the following systems to verify the benefit eligibility:

- **Central Index System (CIS)** is a system that supports a legacy Immigration and Naturalization Services records management need to collect and disseminate automated biographic and historical information on the status of applicants seeking immigration benefits. CIS collects A-Number and alias information. The data in CIS is compared to the data entered in CLAIMS 3 for identity verification purposes. CasePro also gathers aliases from CIS to submit to CBP TECS for background checks.[11]

- **Scheduling and Notification of Applicants for Processing (SNAP)** is the automated system that schedules appointments for applicants to submit biometric information at the ASCs. SNAP determines if the applicant has a pending appointment, the appointment type, and the appointment date. SNAP uses PII to determine if the applicant needs a new biometric or fingerprint appointment scheduled, and to know if the applicant was scheduled for that appointment. CasePro processing of a case ceases while waiting for the applicant to appear for an appointment. CasePro continuously checks SNAP until it locates appointment information for the applicant.[12]

- **Fingerprint Tracking System (FD-258)** maintains biographic data, fingerprint transmission data, and the FBI Fingerprint Check response data. The FBI Fingerprint Check is conducted on applicants over the age of 14 when the benefit requested allows him or her to remain in the United States beyond one year. The FBI Fingerprint Check is a search of the FBI's Integrated Automated Fingerprint Identification System (IAFIS) to identify applicants who have an arrest record. CasePro retrieves the fingerprint response data from FD-258 to determine benefit eligibility.[13]

- **IBIS Manifest** conducts TECS Name Checks against TECS.[14] The results of the name check search are stored in IBIS Manifest for adjudication purposes. CasePro uses the

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[11] Please see DHS/USCIS/PIA-009 - Central Index System (CIS) for more information on CIS, available at www.dhs.gov/privacy.

[12] Please see DHS/USCIS/PIA-020 - Scheduling and Notification of Applicants for Processing (SNAP) for more information on SNAP, available at www.dhs.gov/privacy.

[13] Please see DHS/USCIS/PIA-033 - Immigration Benefits Background Check Systems (IBBCS) for more information on FD-258 and the FBI Fingerprint Check, available at www.dhs.gov/privacy.

[14] Please see the DHS/USCIS/PIA-033 - IBBCS for more information on IBIS Manifest and the CBP TECS Name Check, available at www.dhs.gov/privacy.

results from the IBIS Manifest to determine the applicant's eligibility for the immigration benefit being sought.

Application Adjudication Process

CasePro conducts internal evaluations driven pursuant to specific rules to determine if an applicant is eligible for the benefit sought. The SQA evaluation is used to determine whether the applicant meets the eligibility requirements for TPS and DED. Cases that meet all eligibility requirements are recommended for approval. All filings meeting eligibility requirements for SQA are vetted through a quality assurance process prior to CLAIMS 3 approval. The final decision is manually entered into CLAIMS 3 by a batch update to CLAIMS 3 by the Clerical Unit at the VSC adjudicator.

TPS and DED cases not eligible for adjudication via SQA are placed in queue for further review by an adjudicator. Cases can either remain electronic in electronic form in CasePro, or they can be printed and worked physically by the adjudicator. Cases that require more evidence from the applicant or a case that is identified for denial are printed. The case(s) may also be routed to a print queue based upon CasePro's identification of the problem through the rules-based logic or the officer may decide the case requires correspondence with the applicant to obtain evidence or further explanation of evidence already submitted in order to make a final decision on the case. CasePro automatically terminates electronic processing of a case based upon the print queue status code selected in the system. The pending status of the case in CLAIMS 3 ensures the case is adjudicated like any other physical file worked at the Service Center. Once a case is physical, whether approved or denied, the printed documents must be placed in the applicant's A-File.

Pending electronic and physical cases are assigned to an adjudicator who conducts a review of the case. For printed files, a template of the form with the CLAIMS 3data in the appropriate fields is printed from the system. Along with that, a summary of the inadmissibility questions, the information gathered by CasePro and the TECS Check data are all printed. Adjudicators electronically or manually review all the information provided by the individual along with any additional information compiled by CasePro. In both cases, the adjudicator is responsible for ensuring that all adjudicative tasks are completed to determine if TPS or DED eligibility requirements are met. The adjudicator may also print a hardcopy of the complete case when he or she determines that an adverse or interim action is necessary while electronically adjudicating the case.[15] Adjudicators may approve or deny the benefit at this stage of the process. The approval determinations are made in CasePro and ultimate adjudicative decision on a case is recorded and tracked in CLAIMS 3.

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[15] "Adverse" or "interim" mean any action other than an approval that is taken by an adjudicator during the adjudication process. An adjudicator makes these determinations via an examination of the electronic information displayed in CasePro from the source system.

CasePro performs similar automated data verification checks for DACA filings but does not automatically adjudicate the case. All DACA filings must be reviewed by and receive a final adjudication by an adjudicator in order to evaluate the evidentiary requirements. The ultimate decision on a DACA case is always recorded in CLAIMS 3. The adjudicator may also print a hardcopy of the complete filing when he or she determines that an adverse or interim action is necessary. The assigned adjudicator places these copies in the applicant's A-File for further processing.

Reporting

CasePro generates a number of statistical reports to manage the workload, system and employee performance. CasePro can also generate reports to identify types, number, and status of cases, which allows supervisors to identify oldest cases in queue for processing. Supervisors and management personnel use the reports to monitor and assess progress and adjudication of TPS, DED, and DACA cases.

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 authority to collect information is found within the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1101, 1103, 1201, and 1255.

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

The applicable System of Records Notice (SORN) for this system of records is DHS/USCIS-007 Benefit Information System (BIS) September 29, 2008, 73 FR 56596.[16]

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

CasePro is covered as a subsystem under the CISCOR security authorization boundary. The Security Plan for CISCOR, which includes CasePro, was completed on August 27, 2012. The ATO for CasePro expires on April 18, 2016.

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

USCIS is developing the records retention schedule for CasePro and is proposing a 15 year disposition schedule. NARA has approved the retention schedules for USCIS source systems.

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[16] Available at http://www.gpo.gov/fdsys/pkg/FR-2008-09-29/html/E8-22802.htm.

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.**

The collection of information for TPS, DED, and DACA filings are subject to the Paperwork Reduction Act. USCIS obtained approval from OMB for the following forms: I-821 (OMB No. 1615-0043), I-821D (OMB No. 1615-0124), and I-765 (OMB No. 1615-0040).

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.**

CasePro retrieves the following PII from other USCIS systems: full name, aliases, gender, address, date of birth, country of birth, country of citizenship, A-Number, Receipt Number, current fingerprint results, date of last entry into the United States, and TECS results. Please see Appendix A for a complete list of this information collected and used within CasePro. This information is used to perform a SQA or manual action.

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

CasePro does not collect information from the individual applicant directly. CasePro pulls pending filings from CISCOR, originally derived from CLAIMS 3. CasePro also interfaces with the following systems during the electronic adjudication process of TPS, DED, and DACA filings to determine benefit eligibility: CISCOR, CLAIMS 3, IBIS Manifest, SNAP, CIS, and FD-258. USCIS employees or contractors may enter relevant case-related information into a free text box, which will be stored in CasePro and associated with an applicant's A-Number. The information noted in the free text box remains in the CasePro system and is not stored in CLAIMS 3 or the A-File. However, the ultimate decision is recorded in CLAIMS 3 via WIN765 and the A-File.

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

CasePro does not use commercial or publicly available data.

2.4   Discuss how accuracy of the data is ensured.

The accuracy of the information in CasePro is dependent on the accuracy of the data in the source systems. Prior to applying the adjudication rules, CasePro extracts CISCOR PII to capture any data changes to ensure the most accurate and up-to-date information is used to determine benefit eligibility. If inconsistencies exist with information previously obtained from source systems, the adjudicator conducts an additional review to evaluate the accuracy of the information. Additionally, VSC also has a quality control department that reviews a statistical sampling of every SQA for issues in the SQA process.

2.5   <u>Privacy Impact Analysis</u>: Related to Characterization of the Information identified and how they were mitigated.

Privacy Risk: There is a risk that this system may collect more information than is necessary to perform the SQA .

Mitigation: USCIS limits the information collected in CasePro to the minimum necessary to determine whether an SQA can be performed which ultimately determine s an applicant's benefit eligibility. In order to minimize the PII stored in CasePro, USCIS limits the PII stored to information collected from applicants on USCIS forms.   The collection via these forms went through appropriate Paperwork Reduction Act processes to ensure collections were relevant and necessary. Additionally, USCIS employees or contractors may enter relevant case-related information into a free text box, which will be stored in CasePro and associated with a file. A text entry box allows the user to input text information to be saved by the program. Example of relevant case information may include dates security checks were conducted or date SNAP appointment request was sent to the individual. USCIS VSC personnel are specifically trained to only enter in data related to their official duties.

Privacy Risk: There is a risk that CasePro accesses systems not necessary to adjudicate the benefit.

Mitigation: System interconnections are determined by the benefit filing the adjudicator is processing. CasePro is not configured to access all interconnected systems for every filing under review. The internal logic for CasePro is programmed to enable access only to specific systems necessary for each benefit filing validation.   However, an officer cannot access another system directly using CasePro. If a user attempts to access unauthorized systems, CasePro does not return the information. The officer would have to go outside of CasePro to conduct any additional searches.

Privacy Risk: There is a risk that this system may collect inaccurate and untimely data from other systems.

Mitigation: CasePro is dependent on the accuracy and quality of information from the source systems. CasePro ensures the accuracy of the PII by retrieving real time, "read-only"

information directly from the source system. The source systems have Standard Operating Procedures (SOP) in place to correct erroneous information. Additionally, the SQA process undergoes a random quality assurance sampling.

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.

CasePro uses the information from the source systems to process and adjudicate filings for TPS, and DED. CasePro also pre-processes DACA filings by pulling together fingerprint results, related A-Numbers, aliases, and the required security checks to validate the information and determine benefit eligibility.

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.

CasePro data is not used to conduct electronic searches, queries, or analyses to discover or locate a predictive pattern or an anomaly.

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

VSC uses CasePro to automate the administration and adjudication of TPS, DED, and pre-process DACA filings. Access to CasePro is limited to USCIS personnel with a need-to-know. CasePro does not share adjudication decisions with any other DHS organizations. Adjudication determinations are updated in CLAIMS 3 through an electronic interface with CasePro or by adjudicators.

3.4 <u>Privacy Impact Analysis</u>: Related to the Uses of Information

<u>Privacy Risk</u>: There is a risk of data misuse.

<u>Mitigation</u>: USCIS provides a warning banner at all access points to deter unauthorized use of information. The banner warns authorized and unauthorized users about the appropriate uses of the CasePro, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance. In addition, user access to CasePro is limited to USCIS personnel (including contractors and employees) who need the information to perform their job functions. Only USCIS personnel with proper permissions, roles, and security attributes are authorized to access CasePro for adjudication and technical purposes. Each employee is obligated to adhere to and sign a user access agreement, which outlines the appropriate rules of behavior tailored to CasePro. The system administrator is responsible for granting the

appropriate level of access. Further, all USCIS employees are properly trained on the use of information in accordance with DHS policies, procedures, regulations, and guidance.

Privacy Risk: There is a risk of unauthorized access.

Mitigation: USCIS protects these records from unauthorized access through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. Access to CasePro is given to a limited number of VSC personnel for the purpose of determining benefit eligibility. Employees must use their issued credentials to gain access to building and then login ID's and Passwords to access CasePro. USCIS also deploys user logs to ensure users are only accessing information related to their job functions. In addition, customer service personnel have read-only access to CasePro.

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 this PIA and the DHS/USCIS-007 BIS SORN. Additionally, USCIS provides individuals who apply for TPS, DED, and DACA benefits with a Privacy Act Statement as required by Section (e)(3) of the Privacy Act and requires individuals to sign a release authorization on the benefit application. The Privacy Act Statement details the authority to collect the requested information and outlines the intended uses. The forms also contain a provision by which an applicant authorizes USCIS to release any information received from the applicant as needed to determine eligibility for benefits.

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

USCIS benefit applications require the applicant to provide biographic and biometric information. This information is critical in making an informed adjudication decision to grant or deny a USCIS benefit. Applicants who apply for USCIS benefits have an opportunity and/or right to decline to provide information. However, the failure to submit such information prohibits USCIS from processing and properly adjudicating the application and thus precludes the applicant from receiving the benefit. Therefore, through the application process, individuals have consented to the use of the information submitted for adjudication purposes.

4.3   Privacy Impact Analysis: Related to Notice

Privacy Risk: There is risk that insufficient notice is provided to the applicant.

Mitigation: USCIS provides notice to individuals that the requested information is used to determine whether they are eligible for benefits through the publication of this PIA. Each immigration form contains a provision by which an applicant authorizes USCIS to release any information from the application as needed to determine eligibility for benefits. Applicants are also advised that the information provided will be shared with other Federal, state, local and foreign law enforcement and regulatory agencies during the course of the investigation. Additionally, the USCIS BIS SORN, which covers the information in CasePro, provides additional notice to individuals by specifying the routine uses of the system.

Section 5.0 Data Retention by the project

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

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

USCIS has proposed the following retention schedule and is subject to NARA approval:

For inputs (information from immigration applications and other source systems) and the Master File, USCIS will destroy or delete the information 15 years after last the completed action. For outputs, CasePro produces one of two results: (1) a recommendation from CasePro for SQA approval or (2) cases requiring review by an adjudicator. Printed cases are still available for viewing in CasePro. CasePro will also output copies of the forms if an adverse or interim action is determined. These records will be destroyed/deleted when no longer needed for agency business. System Documentation such as record layouts, technical description of files, data dictionary, and System Development Life Cycle (SDLC) documents will be destroyed/deleted when no longer needed for agency business.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: Retaining information longer than necessary may exceed the limitations provided by the Privacy Act data minimization requirements

Mitigation: The CasePro retention periods identified in the proposed NARA schedule are consistent with the concept of retaining data only for as long as necessary to support the USCIS's mission. The schedule proposed complies with the requirements of the Federal Records Act and the stated purpose and mission of CasePro and the source systems. The time periods in the NARA schedule will be carefully negotiated between USCIS and NARA to ensure that data is retained for the minimum time needed to process the application and make the information available for other USCIS benefits that might be sought by an applicant.

Section 6.0 Information Sharing

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

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

USCIS does not share information from CasePro with external agencies or entities. CasePro does generate bar codes which can be used to manually update CLAIMS 3 with the adjudication decisions. For a full discussion of CLAIMS 3 information-sharing practices, please refer to Section 6.0 of the CLAIMS 3 PIA.

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

USCIS does not share information from CasePro with external agencies or entities.

6.3   Does the project place limitations on re-dissemination?

USCIS does not share information from CasePro with external agencies or entities.

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

USCIS does not share information from CasePro with external agencies or entities.

6.5   Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: The primary privacy issue in external sharing is the sharing of data for purposes that are not in accord with the stated purpose and use of the original collection.

Mitigation: CasePro does not share information with organizations external to DHS. USCIS has formal review and approval process in place for new sharing agreements. Approval officials must review and approve any new sharing initiatives with external agencies, entities, or systems.

Section 7.0 Redress

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

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

An individual may gain access to his or her USCIS records by filing a Freedom of Information Act (FOIA) or Privacy Act request. Any individual seeking access to their USCIS record may submit the aforementioned requests to following address:

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

Certain information requested may, however, be exempt from disclosure under the Privacy Act because sometimes files contain law enforcement sensitive information and the release of such information could possibly compromise ongoing criminal investigations. Further information for Privacy Act and FOIA requests for USCIS records can also be found at http://www.uscis.gov.

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

Requests to contest or amend information should be submitted as discussed in Section 7.1. The record must be identified in the same manner as described for making a request for access. The request should state clearly the information that is being contested, the reasons for contesting it, and the proposed amendment to the information. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." If USCIS intends to use information that is not contained in the application or supporting documentation (e.g., criminal history received from law enforcement), it will provide formal notice to the applicant and provide them an opportunity to refute the information prior to rendering a final decision regarding the application. This provides yet another mechanism to correct erroneous information.

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

The DHS/USCIS-007- BIS SORN provides individuals with notice and guidance regarding the procedures for correcting information. This PIA also provides similar notice. Privacy Act Statements, including notice to correct information, are also contained in immigration forms published by USCIS.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: The main risk with respect to redress is that the right may be limited by Privacy Act exemptions or limited avenues for seeking redress.

Mitigation: The redress and access measures offered by USCIS are appropriate given the purpose of the system. Individuals are given numerous opportunities during and after the completion of the applications process to correct information they have provided and to respond to information received from other sources. USCIS does not claim any Privacy Act access and amendment exemptions for this system so individuals may avail themselves to redress and appeals as stated in the DHS Privacy Act regulations.[17]

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?

CasePro has an audit trail capability to monitor registered user activities and generate alerts for unauthorized access attempts. The general audit log and the security log allows the Global Administrator to select event type such as access or logon and the data displayed includes timestamp, name, IP, transaction, and site. The other log is the autolock log and the display for it shows the employee's name, last login, autolock date with time, reinstate date with time, username, and site. This auditing is a strong influence toward influencing users to use CasePro appropriately.

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

USCIS provides annual privacy and security awareness training to all employees and contractors. The Culture of Privacy Awareness training addresses appropriate privacy concerns, including Privacy Act obligations (e.g., SORNs, Privacy Act Statements, etc.). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information.

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[17] See 6 CFR § 5.21.

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

Access will be limited to authorized USCIS employees and contractors. In compliance with federal law and regulations, users have access to CasePro on a need to know basis. This need to know is determined by the individual's current job functions. Users may have read-only access to the information if they have a legitimate need to know as validated by their supervisor and the system owner and have successfully completed all personnel security training requirements. System administrators may have access if they are cleared and have legitimate job functions that would require them to view the information. Developers do not have access to production data except for specially cleared individuals who perform systems data maintenance and reporting tasks. Access privileges are limited by establishing role-based user accounts to minimize access to information that is not needed to perform essential job functions.

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?

CasePro does not have any information sharing agreements with organizations within or outside of DHS. Final adjudications are shared through CLAIMS 3, CIS, and/or the A-File. However, USCIS has formal review and approval process in place for new sharing agreements. Any new use of information and/or new access requests for CasePro must go through the USCIS change control process and must be approved by the proper authorities of this process.

Responsible Officials

Donald K. Hawkins
Privacy Officer
Department of Homeland Security

Approval Signature

Original signed and on file with the DHS Privacy Office

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Karen L. Neuman
Chief Privacy Officer
Department of Homeland Security