



**Privacy Impact Assessment Update  
for the**

**Computer Linked Application  
Information Management System  
(CLAIMS 3) and Associated Systems**

**DHS/USCIS/PIA-016(b)**

**May 7, 2019**

**Contact Point**

**Donald K. Hawkins**

**Privacy Officer**

**U.S. Citizenship and Immigration Services**

**(202) 272-8030**

**Reviewing Official**

**Jonathan R. Cantor**

**Acting Chief Privacy Officer**

**Department of Homeland Security**

**(202) 343-1717**



## Abstract

U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States and is responsible for processing petitions, applications, and other requests for immigration benefits and requests. USCIS uses the Computer Linked Application Information Management System (CLAIMS 3) and associated systems to manage the adjudication process for most domestically-filed immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status. USCIS is now updating this PIA to provide notice of system changes in support of the USCIS eProcessing initiative. Upon publication of this PIA, CLAIMS 3 will (1) support the acceptance of certain electronically filed immigration benefits; (2) include a new icon enabling users to retrieve and view immigration content in support of the benefit adjudication; and, (3) communicate with RAILS (not an acronym) to identify the location of the immigration file. This PIA update evaluates the privacy risks and mitigations associated with these updates including the collection, use, and maintenance of personally identifiable information (PII).

## Overview

USCIS receives and adjudicates petitions, applications, and other requests (hereinafter referred to as “immigration related requests”) for many United States immigration benefits and requests. Historically, USCIS used CLAIMS 3 to process many paper-based, immigration benefit filings with the exception of naturalization, intercountry adoption, and certain requests<sup>1</sup> for asylum and refugee status. CLAIMS 3 is the case management system that supports the maintenance and tracking of officer casework documentation for many immigration related requests. CLAIMS 3 functionalities include tracking the adjudication performed by USCIS personnel, archiving, card production, case history, case transfer, on-demand reports, electronic file tracking, image capture, production statistics, and status updates.

As described in the DHS/USCIS/PIA-061 Benefit Request Intake Process,<sup>2</sup> in order to initiate the immigration related request process, a requestor may complete an immigration related request form by paper or file the form electronically (if available); both methods collect the same information and payment fee. At the time of publication of both DHS/USCIS/PIA-016(a) and DHS/USCIS/PIA-061, CLAIMS 3 only supported the intake and processing of paper-filed

---

<sup>1</sup> The “certain requests” for refugee and asylum benefits include the “follow to join” petition (Form I-730). “Follow to join” is an option offered to family members of the principal beneficiaries of approved asylum and refugee status. Immediate family members (spouses and children under the age of 21) may qualify for derivative status. An individual who entered the United States and was granted asylum/refugee status within the past two years may petition to have his or her spouse and/or unmarried children “follow-to-join” him or her in the United States and obtain derivative status. The derivatives may be in the United States or outside the United States.

<sup>2</sup> See DHS/PIA/USCIS-061 Benefit Request Intake Process, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



immigration related requests.<sup>3</sup> To support the paper processing of an immigration related request in CLAIMS 3, a requestor (or his or her legal representative) was instructed to a mail completed paper-based form, supporting documents, and the applicable fee payment or fee waiver to a USCIS Service Center, the National Benefits Center, or to a USCIS Lockbox.

Upon receipt, USCIS preliminarily reviewed the form for completeness, assigned the benefit requestor an Alien Number (A-Number) or matched the request with an existing A-Number (if applicable), assigned the application a Receipt Number, and forwarded the benefit request form, to be consolidated in the Alien File (A-File) or Receipt File, to the appropriate USCIS office for adjudication. After preliminary review, USCIS personnel manually entered relevant and necessary information from the paper benefit request form into CLAIMS 3. As part of the adjudication process, USCIS personnel reviewed all case-related information provided by the immigration related requestor or his or her representative, including supplementary evidence and review the A-File (if available) to verify the identity and eligibility of the requestor, completed all necessary screening, and conducted interviews (as necessary) to make a final determination on the immigration related request (e.g., grant, deny, revoke).

## Reason for the PIA Update

USCIS launched the eProcessing initiative to eliminate the creation of new paper immigration records.<sup>4</sup> USCIS is moving from a traditional paper-based environment to a digital environment in which the immigration related request filing, adjudication, and communication are all electronic. As USCIS moves towards a digital environment, USCIS is fundamentally shifting its immigration records management processes and technologies. USCIS has historically used large systems with siloed operational functions to perform its case management needs. As part of the eProcessing initiative, USCIS plans to leverage and integrate existing operational systems with new services in an effort to enhance the processing of electronically filed immigration related request forms. USCIS updated CLAIMS 3 to support the case management functions of certain electronically filed applications.<sup>5</sup>

USCIS has made several updates to CLAIMS 3 since the publication of DHS/USCIS/PIA-016(a). Upon publication of this PIA, CLAIMS 3 will interface with the following systems:

- (1) myUSCIS Account Experience to receive certain electronically filed immigration benefit and request forms for adjudication;<sup>6</sup>

---

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

<sup>4</sup> Immigration files currently in paper form will remain as such until an individual affirmatively requests an additional benefit or until the record is otherwise used in an administrative context.

<sup>5</sup> Please see the CLAIMS 3 PIA Appendix A for a list of forms.

<sup>6</sup> See DHS/USCIS/PIA-071 myUSCIS Account Experience, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



(2) STACKS to retrieve case-specific immigration-related content maintained in Content Management System (CMS);<sup>7</sup> and

(3) RAILS to retrieve the immigration file location(s).<sup>8</sup>

All USCIS systems exchange information through various data streaming services.<sup>9</sup> The data streaming services are a combination of data delivery tools and connections to facilitate the seamless communication between different USCIS systems. CLAIMS 3 does not directly connect to any of these new systems, but relies on the data streaming services to share information. USCIS uses data streaming services to integrate existing systems with new applications and support services. The integration with these data streaming services allows CLAIMS 3 to share and receive information from other systems without adversely impacting the availability of CLAIMS 3.

### **myUSCIS**

USCIS offers individuals two options for filing immigration request forms with USCIS – online and by mail (paper). USCIS established the myUSCIS Account Experience to offer customers an authenticated online account to securely engage with USCIS. Individuals seeking access to myUSCIS Account Experience are first required to create an account to access and use the services offered by the online portal. Once an account is created, individuals are able to file benefit and other immigration related requests electronically, check the status of pending cases, store supplemental evidence, as well as receive notices from USCIS, and communicate case-specific inquiries with USCIS.

myUSCIS Account Experience allows certain benefit and other immigration related request forms and service types to be electronically completed and filed by requestors and/or legal representatives.<sup>10</sup> The electronic filing component of myUSCIS Account Experience offers an interactive tool that assists individuals (immigration related requestors and/or legal representatives) with completing certain immigration benefit and other request forms or certain fee payments. The electronic benefit request forms collect the same information as the corresponding paper forms. Once the request form is completed, myUSCIS prompts the individual to review and sign the benefit request form, as well as pay the associated filing fees before final submission.<sup>11</sup>

---

<sup>7</sup> See DHS/USCIS/PIA-079 CMS, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>8</sup> See DHS/USCIS/PIA-075 RAILS, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>9</sup> See DHS/USCIS/PIA-008 Enterprise Service Bus (ESB) and the DHS/USCIS/PIA-078 Data Streaming Services PIA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>10</sup> See Appendix B to DHS/USCIS/PIA-071 myUSCIS Account Experience to view the list of electronically available forms.

<sup>11</sup> Payment information is collected by the Department of Treasury's Pay.gov system (see Financial Management Service (FMS) PIA and Revenue Collection Records – Treasury/FMS.017 SORN, 68 FR 5691).



Once the form is officially submitted to USCIS, myUSCIS sends the immigration related request form to the appropriate case management system for receipt and adjudication. Initially, myUSCIS sent electronically filed request forms to USCIS Electronic Immigration System (USCIS ELIS) for adjudication.<sup>12</sup> However, instead of consolidating all electronic filings into one system, USCIS has focused resources on enhancing previously used systems for various benefit types (e.g., asylum, employment based, and naturalization filings) to support the electronic processing of immigration benefit request forms.

Depending on the immigration related request form type, myUSCIS sends the filing to the respective case management system. USCIS is establishing communication between myUSCIS and CLAIMS 3 via Kafka for receipt and adjudication purposes. Certain key data elements from the form are automatically transferred to and populated within CLAIMS 3, while the full online submission, including the form and any supporting evidence, is retained in CMS. USCIS adjudicators continue to use CLAIMS 3 as outlined in DHS/USCIS/PIA-016(a).

### **STACKS**

As described above, CMS retains a copy of the full immigration related request filing submitted by the requestor using myUSCIS. However, USCIS is also enhancing CLAIMS 3 by creating an icon enabling direct access to STACKS. STACKS is the user interface that allows users to view the immigration related request form, evidence, and other case content that is received via myUSCIS and stored in CMS. Only cases that are submitted to USCIS via myUSCIS Account Experience have the STACKS icon within CLAIMS 3. When users click this icon, the relevant case-related information (including a copy of the request form in its entirety as well as all associated supporting evidence and documentation) open in STACKS. This direct access provides easy access to relevant content without the USCIS user needing to separately access another system or file in support of the adjudication process.

### **RAILS**

USCIS used legacy National File Tracking System (NFTS) to locate an immigration file within an office and track the movement of files between offices. CLAIMS 3 previously connected to NFTS via Enterprise Service Bus (ESB). USCIS replaced NFTS with a modernized version, known as RAILS, which continues to serve as an automated file tracking system to maintain an accurate file inventory and track the location of paper and electronic immigration files. CLAIMS 3 exchanges information with RAILS via the ESB 2. Through ESB 2, RAILS obtains limited information from CLAIMS 3 pertaining to the subject of the record, the system user, and the location of electronic and paper immigration files in order to track the current locations of immigration files. RAILS shares the location and creation of paper and electronic immigration files with CLAIMS 3.

---

<sup>12</sup> See DHS/USCIS/PIA-056 USCIS ELIS, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy)



## Privacy Impact Analysis

### Authorities and Other Requirements

The legal authority to collect and use information, including Social Security number (SSN), does not change with this update. Section 103 of the Immigration and Nationality Act (INA) provides the legal authority for the administration and adjudication of immigration and non-immigration benefits.<sup>13</sup>

The collection, use, maintenance, and dissemination of information are covered under the following system of records notices (SORN):

- Alien File, Index, and National File Tracking System<sup>14</sup> covers the collection, use, and maintenance of applications and supplemental evidence, in addition to other information related to the individual as he or she passes through the immigration process;
- Immigration Biometric and Background Check<sup>15</sup> covers background checks and their results; and
- Benefits Information System<sup>16</sup> covers the collection and use of immigrant and non-immigrant benefit applications, decisional data, and associated fees for adjudication.

This update does not change the Authority to Operate (ATO) for CLAIMS 3. USCIS issued the ATO for CLAIMS 3 on September 3, 2015, and this system is part of an Ongoing Authorization program. As such, CLAIMS 3 will have an ongoing ATO with no expiration date as long as CLAIMS 3 continues to operate in compliance with security and privacy requirements.

The associated records schedule does not change with this update. USCIS continues to retain data within CLAIMS 3 for 50 years from the date of the last completed action in accordance with NARA Disposition Authority Number DAA-0566-2016-0013.

This update does not impact the Paperwork Reduction Act (PRA) requirements for CLAIMS 3. The information stored within CLAIMS 3 is subject to the PRA and the burden is accounted for under each information collection (i.e., applications and requests).

---

<sup>13</sup> Immigration and Nationality Act (*as amended*), 8 U.S.C. ch. 12, *available at* <https://www.uscis.gov/ilink/docView/SLB/HTML/SLB/act.html>.

<sup>14</sup> DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Oct. 18, 2017).

<sup>15</sup> DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 FR 36950 (July 31, 2018). This SORN replaces the DHS/USCIS-002 Background Check Service, which previously provided coverage for the background check results stored in CLAIMS 3.

<sup>16</sup> DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016)





### Characterization of the Information

This update does not impact the collection of information in CLAIMS 3. USCIS continues to collect and maintain the information outlined in Section 2.0 of the DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems.

This update does not impact the sources of information collected. USCIS continues to collect information directly from the immigration related requestor and/or legal representative and internal and external systems. Instead of solely collecting information via paper forms, USCIS is now also collecting information via the myUSCIS online portal. Information from myUSCIS is transferred directly into CLAIMS 3 via Kafka.

This update does not impact the use of information from commercial sources or publicly available data.

This update increases the accuracy of information received from the requestor and/or legal representative. Previously, information was manually entered into the CLAIMS 3 system from the immigration related request form. The automatic transfer of data from myUSCIS to CLAIMS 3 (via Kafka) reduces the potential of risk of inaccurate data due to manual data entry throughout the adjudication process. Kafka is highly available and resilient to system failures and supports automatic recovery, making Kafka a reliable choice to send accurate and complete data between myUSCIS and CLAIMS 3.

**Privacy Risk:** There is a risk that inaccurate or incomplete data will be transferred from myUSCIS to CLAIMS 3 via Kafka.

**Mitigation:** This risk is mitigated. Previously, information was manually entered into the CLAIMS 3 system from the request form. With this practice, there was an increased risk of inaccurate data within CLAIMS 3. USCIS mitigated this risk as best as possible through training, supervisor reviews, and ongoing quality assurance reviews. With this update, data is entered into myUSCIS directly from the benefit requestor and is then encrypted, transported, and delivered “as is” to CLAIMS 3 via Kafka, with the exception of reformatting to standardize the representation of the data. This process ensures the data integrity from the producer system to the consumer system. Kafka continuously extracts, replicates, and loads myUSCIS information in real-time to keep that system data consistent with the data in myUSCIS. Kafka continuously refreshes, which allows the tool to identify changes and immediately send any updated or corrected information to CLAIMS 3.

### Uses of the Information

The uses of information do not change as a result of this update. USCIS continues to use CLAIMS 3 and its associated systems to support and manage the administration and adjudication of certain immigration related requests.



CLAIMS 3 continues to not use technology to conduct electronic searches, queries, or analyses to discover or locate a predictive pattern or anomaly.

DHS Components continue to have read-only access to CLAIMS 3 to perform mission requirements, but will be unable to access STACKS using the STACKS icon in CLAIMS 3. DHS Component access and use does not change as a result of this update.

There are no additional risks to the uses of information.

### **Notice**

USCIS is providing general notice about the system changes through this PIA update. USCIS also continues to provide notice through the associated SORNs listed in the “Authorities and Other Requirements,” and through the Privacy Notices on the associated forms (both paper and electronic). Furthermore, once electronic filing is mandated, USCIS will publish subsequent notices stating that the paper form will no longer be accepted and the request must be submitted online. There are no additional risks to notice.

### **Data Retention by the project**

The records schedule does not change with this update. Data will be retained for 50 years from the date of the last completed action in accordance with NARA Disposition Authority Number DAA-0566-2016-0013. There are no additional risks to the retention of information.

### **Information Sharing**

The external sharing of CLAIMS 3 does not change as a result of this PIA. Any external sharing through myUSCIS and STACKS is discussed in the myUSCIS and CMS PIAs, respectively. There are no additional risks to information sharing.

### **Redress**

This update does not impact how access, redress, and correction may be sought through USCIS. USCIS continues to provide individuals with access to their information through a Privacy Act or Freedom of Information Act (FOIA) request. Individuals not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. U.S. Citizens and Lawful Permanent Residents may also file a Privacy Act request to access their information. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS record, the request can be mailed to the following address:

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

Persons not covered by the Privacy Act or JRA are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her record received through FOIA,





he or she may visit a local USCIS Field Office to identify and amend inaccurate records with evidence.

### **Auditing and Accountability**

USCIS ensures that practices stated in this PIA comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. CLAIMS 3 is maintained in the Amazon Web Services (AWS), which is a public cloud designed to meet a wide range of security and privacy requirements (e.g., administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with federal security guidelines.<sup>17</sup> AWS is Federal Risk and Authorization Management Program (FedRAMP)-approved and authorized to host PII.<sup>18</sup> FedRAMP is a U.S. government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services. USCIS employs technical and security controls to preserve the confidentiality, integrity, and availability of the data, which are validated during the security authorization process. These technical and security controls limit access to USCIS users and mitigate privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further DHS security specifications also require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

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

**Mitigation:** This risk is mitigated. USCIS is responsible for all PII associated with the CLAIMS 3, whether on USCIS infrastructure or on a vendor's infrastructure and it therefore imposes strict requirements on vendors for safeguarding PII data. This includes adherence to the DHS 4300A Sensitive Systems Handbook, which provides implementation criteria for the rigorous requirements mandated by DHS's Information Security Program.<sup>19</sup> USCIS cloud service providers must be FedRAMP-certified. By using FedRAMP-certified providers, USCIS leverages cloud services assessed and granted provisional security authorization through the FedRAMP process to increase efficiency while ensuring security compliance. All contracted cloud service providers must follow DHS privacy and security policy requirements. Before using AWS, USCIS verified through a risk assessment that AWS met all DHS privacy and security policy requirements.

---

<sup>17</sup> Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.

<sup>18</sup> <https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName>.

<sup>19</sup> See <https://www.dhs.gov/publication/dhs-4300a-sensitive-systems-handbook>.



Further, all cloud-based systems and service providers are added to the USCIS Federal Information Security Modernization Act (FISMA) inventory and are required to undergo a complete security authorization review to ensure security and privacy compliance. As part of this process, the DHS Senior Agency Official for Privacy reviews all FedRAMP cloud service providers for privacy compliance and privacy controls assessments as part of the privacy compliance review process.

## Responsible Official

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.

---

Jonathan R. Cantor  
Acting Chief Privacy Officer  
Department of Homeland Security