



Privacy Impact Assessment Update
for the

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

DHS/USCIS/PIA-016(c)

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Abstract

U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States and is responsible for processing petitions and applications for immigration benefits, and other immigration requests. USCIS uses the Computer Linked Application Information Management System (CLAIMS 3) and associated systems to support the adjudication functions for immigration filings with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status. As part of the adjudication process, USCIS conducts various screenings and background checks, including the TECS Name Check. USCIS is updating this PIA to introduce the CLAIMS 3 interconnection with the TECS microservice to facilitate TECS Name Checks. USCIS adjudicators are able to access the results of these checks through an embedded TECS by ELIS (TbE) icon. USCIS is updating this PIA to evaluate the privacy risks and mitigations associated with the use of TbE to view name check results, and reliance on the TECS microservice to facilitate TECS Name Checks for immigration requests processed in other USCIS case management systems.

Overview

USCIS is the component within the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. USCIS receives immigration requests from individuals seeking immigration and non-immigration benefits. Once a benefit request form is submitted to USCIS, a series of processing and adjudication actions occur, such as case receipt and intake, biometric collection appointment generation, case specific processing and management, automated background checks, interview appointment scheduling, final decision rendering, and production of the proof of benefit. One of the case management systems used to track and adjudicate certain immigration requests forms filed with USCIS is the Computer Linked Application Information Management System (CLAIMS 3).¹

USCIS uses CLAIMS 3 to process immigration requests with the exception of naturalization, intercountry adoption, and certain requests for asylum and refugee status.² 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

¹ See DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, available at www.dhs.gov/privacy.

² 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.



history, case transfer, on-demand reports, electronic file tracking, image capture, production statistics, and status updates.

As described in DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems, all individuals submitting benefit requests are subject to background, identity, and security checks to ensure eligibility for the requested benefit and to ensure that they do not pose a threat to public safety or to the national security of the United States. USCIS conducts background, identity, and security checks as part of case processing. In particular, USCIS conducts mandatory U.S. Customs and Border Protection (CBP) TECS (not an acronym) Name Checks³ on all individuals more than 14 years of age who file immigration requests. The TECS Name Check query consists of a name-based search to identify records of known and suspected terrorists, sex offenders, people who are public safety risks and other individuals that may be of interest (e.g., individuals who have warrants issued against them, people involved in illegal gang activity) to the law enforcement community.

Historically, CLAIMS 3 relied on a direct connection to USCIS ATLAS (not an acronym).⁴ CLAIMS 3 sent the individual's full name and date of birth through ATLAS to CBP TECS, which in turn, queried CBP TECS to identify any derogatory information. After completion of the check, ATLAS sent the hit response (i.e., "Hit" or "No Hit") and the hit reason to the Service Center Operations Directorate (SCOPS) Background Check Unit (BCU) via encrypted email, as well as CLAIMS 3. Full results were previously stored in the Fraud Detection and National Security Data System (FDNS-DS).⁵ This PIA will focus on updates to the CBP TECS Name Check process.

Reason for the PIA Update

USCIS launched the eProcessing initiative to eliminate the creation of new paper immigration records.⁶ USCIS is moving from a traditional paper-based environment to a digital environment, in which the immigration related request filings, adjudications, and communications 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 adjudicative and processing needs. As part of the eProcessing initiative, USCIS plans to leverage and integrate existing

³ Maintained by CBP, TECS is an automated enforcement and inspection lookout system that combines information from multiple agencies, databases, and system interfaces to compile data relating to national security risks, public safety issues, current or past targets of investigations, and other law enforcement concerns. *See* DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing, *available at* www.dhs.gov/privacy.

⁴ ATLAS is a USICS-owned platform which automates and streamlines the screening of biographic and biometric information received from immigration benefit applicants. ATLAS is not an acronym. *See* DHS/USCIS/PIA-013 Fraud Detection and National Security Data System (FDNS-DS), *available at* www.dhs.gov/privacy.

⁵ *See* DHS/USCIS/PIA-013 Fraud Detection and National Security Data System (FDNS-DS), *available at* www.dhs.gov/privacy.

⁶ 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.



operational systems with new services in an effort to uniformly process immigration request forms.

USCIS plans to update the existing CBP TECS Name Check process in an effort to standardize the systems used to facilitate the checks and store the results from CBP. USCIS plans to leverage the TECS microservice,⁷ previously only used to support USCIS ELIS, to facilitate the mandatory name check on all immigration requests for USCIS case management systems, including CLAIMS 3.⁸ USCIS is updating DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems to evaluate the privacy risks and mitigations associated with the interconnection with the TECS microservice to facilitate name checks, the maintenance of results in the TECS Service Account (TECSSVC) database, the launch of TbE to view name check results for immigration requests processed in CLAIMS 3.

The TECS Microservice

USCIS CLAIMS 3 interconnects with the TECS microservice, which is a back-end USCIS ELIS service that interconnects with CBP TECS through USCIS ATLAS, to conduct TECS Name Checks. As part of this update, CLAIMS 3 automatically sends the individual's full name and date of birth to the TECS microservice when a new case is created to initiate a TECS Name Check query. The TECS microservice then sends the limited biographic information through ATLAS to CBP TECS, which in turn, queries CBP TECS to identify any derogatory information. The TECS microservice also sends the response (i.e., Hit or No Hit) to CLAIMS 3 as confirmation that a TECS query was performed. The derogatory results associated with a query are not sent back to the case management system. CLAIMS 3 creates a specific History Action Code (HAC) based on whether there was a match, but no further details are visible in CLAIMS 3. Full results are stored in TECSSVC, which is a separate database within the USCIS ELIS boundary. TECSSVC name check results are accessible to USCIS adjudicators through an embedded TECS by ELIS (TbE) icon within CLAIMS 3.

TECS by ELIS (TbE)

USCIS is enhancing CLAIMS 3 by inserting a TbE icon enabling direct access to CBP TECS Name Check queries and results within TECSSVC. In order to view the full results, the adjudicator is able to click on the TbE icon within CLAIMS 3 to review the full results. This icon streamlines and simplifies access to relevant TECS Name Check data without the USCIS adjudicator needing to separately access another system or file in support of the adjudication process. Using TbE, adjudicators search background check results using the Alien Number, Receipt Number, or first name, last name, and date of birth combinations only. TbE also offers adjudicators the ability to:

⁷ A microservice is an approach to application development in which a large application is built as a suite of modular services. Each module supports a specific business goal and uses a simple, well-defined interface to communicate with other sets of services.

⁸ See DHS/USCIS-056 USCIS ELIS, available at www.dhs.gov/privacy.



- **Conduct manual name harvesting:** Name harvesting entails cross-checking USCIS records to identify additional names or dates of birth that could be pertinent to an applicant.
- **Conduct ad-hoc checks:** USCIS is required to run an ad-hoc check if a name has not been through a TECS check in the past 180 days.
- **Disposition National Crime Informational Center (NCIC)⁹ and TECS Subject Lookout Search (SQ11)¹⁰ records resulting from TECS Name Checks:** USCIS adjudicators are required to resolve hits or refer the case to the Background Check Unit if there is a TECS hit associated with a case. USCIS adjudicators will disposition records if the information has no effect the eligibility of the immigration request being sought.
- **Upload resolution memos from Enterprise Correspondence Handling Online (ECHO)¹¹ or create resolution memos within TbE:** The Resolution Memo is the formal documentation of the reconciliation of a relating hit. This is a mandatory action that must be completed before rendering a final decision.
- **Complete a Record of Inquiry TECS (ROIT) through TbE:** A ROIT is a required document that is completed to records the results of a manual TECS query.

Once cases are imported into TECSSVC, the information is viewable in TbE. Cases that have incomplete information cannot be uploaded into TbE.

Upon completion of the check, the Background Check Unit (BCU) is notified of the background check results, to assist with triaging and processing. To facilitate BCU access to the information, the TECS Microservice sends the complete background check results to the Enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR)¹² managed by the Data and Business Intelligence Support Services (DBIS) team. This data table is separately stored from all other eCISCOR data and does not interconnect with any eCISCOR systems. On a daily basis, the DBIS team sends an email to the BCU officers identifying that the background check results for cases are available. The e-mail contains a hyperlink to allow BCU officers to download background check results from the secured eCISCOR table. The hyperlink expires after a set period of time to safeguard the background check information.

⁹ The NCIC database currently consists of 21 files. There are seven property files containing records of stolen articles, boats, guns, license plates, parts, securities, and vehicles. There are 14 persons files, including: Supervised Release; National Sex Offender Registry; Foreign Fugitive; Immigration Violator; Missing Person; Protection Order; Unidentified Person; Protective Interest; Gang; Known or Appropriately Suspected Terrorist; Wanted Person; Identity Theft; Violent Person; and National Instant Criminal Background Check System (NICS) Denied Transaction.

¹⁰ The TECS Subject Lookout Search (TECS SQ11) is a biographic query for individuals who are the subject of interest by DHS.

¹¹ See DHS/USCIS/PIA-063 Benefit Decision and Output, available at www.dhs.gov/privacy.

¹² See DHS/USCIS/PIA-023(a) eCISCOR, available at 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.¹³

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,¹⁴ which 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,¹⁵ which covers background checks and their results; and
- Benefits Information System,¹⁶ which 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 background check data, including TECS Name Check results, within CLAIMS 3 for 50 years from the date of the last completed action in accordance with National Archives and Records Administration (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). Please see Appendix A of DHS/USCIS/PIA-016(a) for a full list of immigration forms subject to the PRA.

¹³ 8 U.S.C. § 1103(a).

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

¹⁵ 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.

¹⁶ 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 DHS/USCIS/PIA-016(a) CLAIMS 3 and associated systems. With this update, USCIS is introducing the TECS microservice and TbE which supports the TECS Name Check process for immigration requests managed in CLAIMS 3. The TECS microservice collects first name, last name, and date of birth combinations from CLAIMS 3 to initiate a TECS Name Check query. The TECS microservice provides TECSSVC with the full results for storage. The TECS microservice also sends the response (Hit or No Hit) to CLAIMS 3 as confirmation that a TECS query was performed. CLAIMS 3 continues to create a specific HAC based on whether there was a match to USCIS adjudicators are able to view the full results in TECSSVC via the TbE icon embedded within CLAIMS 3. There is no privacy impact to the characterization of information associated with this update since USCIS continues to share limited biographic information from and store limited TECS Name Check results in CLAIMS 3.

Uses of the Information

This update does not impact the uses of information. USCIS continues to use CLAIMS 3 and its associated systems to conduct TECS Name Check checks on immigration related requests. USCIS is leveraging the TECS microservice, originally only used by USCIS ELIS, to facilitate the mandatory name check on all immigration requests for USCIS case management systems. The TECS microservice interconnects with CBP TECS through USCIS ATLAS to initiate the name check query against CBP TECS. The TECS microservice sends the individual's full name and date of birth through ATLAS to CBP TECS, which in turn, queries CBP TECS to identify any derogatory information. Full results are stored in TECSSVC, and are accessible to USCIS adjudicators through an imbedded TbE icon within the case management system. The TECS microservice also sends the response (i.e., hit or no hit) to the appropriate case management system as confirmation that a TECS query was performed.

In addition to serving as a viewer, TbE also provides following functionality to case management systems:

- *Manual Name Harvesting and Ad-Hoc Queries:* USCIS adjudicators are able to manually initiate a TECS Name Check for individuals associated with a benefit request filing. TbE sends the requests through the ELIS TECS microservice to ATLAS. ATLAS then receives the request and facilitates the TECS Name Check for the associated case management system.
- *Documenting Results:* The names and dates of birth for all TECS Name Checks conducted are automatically populated on an electronic version of the ROIT document. USCIS personnel have the ability to annotate the results (no match, does not relate, or relates) of a TECS query. The ROIT will also be automatically populated with the date of a query and



the identification of the USCIS personnel annotating the results of a query. If a system generated query was conducted and the result was not a match, the ROIT will be automatically updated with that result.

- *Documenting Resolutions:* Each hit that relates to an individual must be resolved and documented by a Resolution Memorandum. Electronic versions of Resolution Memorandums can be created in TbE or uploaded into TECS by ELIS after being generated in the ECHO system.

There are no risks to the uses of information since CLAIMS 3 continues use the information to facilitate TECS Name Checks and store limited results.

Notice

USCIS is providing general notice through the publication of this PIA. Each benefit request form, regardless of whether it is paper or electronic, contains a Privacy Notice that provides notice to individuals about the collection, USCIS'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 forms also contain a provision by which an applicant authorizes USCIS to release any information received from the benefit requestor or beneficiary as needed to determine eligibility for benefits. Individuals also receive notice through this PIA, the DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN, the DHS/USCIS-018 Immigration Biometric and Background Check SORN, and the DHS/USCIS-007 Benefits Information System SORN.

Data Retention by the project

The records schedule does not change with this update. CLAIMS 3 continues to maintain limited background check results and the records 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 since CLAIMS 3 plans to continue to adhere to the NARA approved schedule.

Information Sharing

This update does not impact internal and external information sharing as outlined in CLAIMS 3. USCIS continues to query CBP TECS to facilitate name checks, and collects and maintains the TECS Name Check results. There are no additional risks to information sharing since USCIS continues to conduct name checks against CBP TECS.

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

This update does not impact auditing and accountability by implementing technical and security controls to limit access and mitigate privacy risks associated with unauthorized access and disclosure.

Responsible Official

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Approval Signature

Original signed copy on file with the DHS Privacy Office.

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