Privacy Impact Assessment
for the

Electronic Workload Reporting and Tracking System (EWRTS)

DHS/USCIS/PIA-052

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Services (USCIS) is the custodian of the Alien File (A-File) and stores inactive files at the National Records Center (NRC). USCIS, Customs and Border Protection (CBP), and Immigration and Customs Enforcement (ICE) use A-Files in the course of performing their mission and may request A-File content from USCIS NRC. USCIS NRC developed the Electronic Workload Reporting and Tracking System (EWRTS) to accurately record and track A-File requests at the NRC and to record the actions taken to respond to those requests. Information in EWRTS includes contact information of DHS personnel requesting information and the Alien Registration Number (A-number) for subjects of interest. USCIS conducted this PIA to comprehensively discuss the privacy risks and mitigations associated with the use of an electronic database to record and track incoming information requests.

Overview

The United States Citizenship and Immigration Services (USCIS) is the Component of the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. To support immigration benefit operations, USCIS assembles a paper-based file, known as the Alien-File (A-File), which contains official immigration records of persons who are not citizens or nationals of the United States. This function was previously the responsibility of the former Immigration and Naturalization Service (INS), which began issuing each alien an Alien Registration number (A-Number) in 1940, and on April 1, 1944, started using this number to create individual A-Files. A-Files contain all records of any case of an individual not yet naturalized including records created as he or she passes through the U.S. immigration and inspection process, the citizenship process, and, when applicable, records related to any law enforcement action against or involving the alien.

Since the formation of DHS in 2003, the U.S. immigration system has been managed by the following DHS Components: (1) USCIS, which performs the immigration benefit adjudication process; (2) Customs and Border Protection (CBP), which performs the border enforcement and inspection processes; and (3) Immigration and Customs Enforcement (ICE), which performs the investigatory, deportation, and immigration court functions. Although, USCIS is the custodian of the A-File, the three Components create and use A-Files in the course of performing their mission requirements.

Most inactive and less active paper A-Files are currently under the control of the USCIS National Records Center (NRC) and the National Archives and Records Administration's (NARA) Kansas City Federal Record Center (KCFRC). NRC is responsible for the maintenance of over 25.1 million inactive A-Files and for providing its customers with timely access to information contained in the A-Files. USCIS, CBP, and ICE employees, who are stationed both

domestically and internationally, require access to A-Files regularly to assist in adjudicating benefits, investigating immigration violations, and enforcing border protections.

The USCIS NRC Information Management and Field Services Branch (IMFS) Information Liaison (IL) Section serves as the central point of contact for A-File information requests from USCIS, CBP, and ICE. The mission of IL is to provide complete, accurate, and timely information from A-Files housed at the NRC to authorized requesters within specified timeframes; to make updates to electronic records; and to correct paper files housed at NRC. IL provides 24/7 access to information from A-Files located at the NRC and the KCFRC to DHS requestors from USCIS, CBP, and ICE all over the world.

IL developed the Electronic Workload Reporting and Tracking System (EWRTS), which is a locally developed application only accessible at the NRC, to record and track the processing and response of A-File information requests from USCIS, CBP, and ICE. IL also uses EWRTS to generate production reports to measure, analyze, and track time spent on processing information requests by IL employee and unit performance through statistical queries and record reviews. These reports may contain the IL employee's User ID, in addition to production data. Reports are shared with NRC and USCIS leadership.

USCIS, CBP, and ICE officers request content from an individual's A-File from the IL to receive the most up-to-date information about an individual. USCIS, CBP, and ICE officers may request copies of information within the A-File, including, copies of documents, photographs, or fingerprints. USCIS, CBP, and ICE use this information to confirm the identity of a subject or verify a subject's status or class of admission. Officers may also request that IL update or correct the Central Index System (CIS)[1] with name, aliases, date of birth, classification of admission, citizenship data, parents' names, Federal Bureau of Investigations (FBI) number, Social Security number, Passport Number, and entry to or removal from the United States history data.

USCIS, CBP, and ICE officers may request information by e-mail or telephone. Officers must provide the following information to IL to initiate an information request:

- Full name (requester's),
- Office location (including Bureau),
- Telephone number
- Fax number
- Official e-mail address
- Subject's A-Number
- A justification of the documents needed.

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[1] *See* DHS/USCIS/PIA-009 Central Index System (CIS), available at www.dhs.gov/privacy.

IL staff manually enter all incoming telephonic and email requests into EWRTS. Once entered, EWRTS generates a tracking number to associate with the request for tracking purposes. The record is then printed to initiate a manual pull of the A-File. The request is then placed in queue for a contractor to pull the A-file for IL to process.

Each printed request accompanies the A-File for processing. Upon receiving the A-File, the USCIS IL processor locates the requested documentation, scans the requested documents, and sends the documents to the requestor by either fax or e-mail. The IL employee responsible for processing the case updates the EWRTS record to track the date, time, and information provided to the USCIS, CBP, and ICE customer. The printed EWRTS record is destroyed upon completion of the request.

EWRTS centralizes incoming information requests to ensure the timely response in support of USCIS, CBP, and ICE missions. Without EWRTS, IL would be required to manually record customer contact data as well as the data related to the responses provided to customers. Statistical reporting would also be performed manually.

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 specific legal authority for this collection of information is Section 290(a) of the Immigration and Nationality Act.

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

The collection, maintenance, and use of information maintained in EWRTS is covered under the following SORNS:

- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), which covers the collection and use of EWRTS user information;[2] and

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, which covers the collection and use of the A-number and individuals who are subject to the enforcement provisions of the INA.[3]

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

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[2] *See* DHS/ALL-004 - General Information Technology Access Account Records System (GITAARS) November 27, 2012, 77 FR 70792, available at www.dhs.gov/privacy.
[3] *See* DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864, available at www.dhs.gov/privacy.

EWRTS is covered under CISNeT accreditation boundary; therefore, EWRTS operates under the CISNeT authority to operate (ATO). CISNeT completed the security assessment and authorization documentation on September 25, 2014, and was accepted into the Ongoing Authorization program. Ongoing Authorization requires CISNet, including EWRTS, to be reviewed on a monthly basis to maintain its security posture and ATO.

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

EWRTS records are destroyed by an authorized user two years after the date of the latest entry in accordance with General Record Schedule 28, Item 8.

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 provisions of the PRA do not apply to EWRTS. The information maintained by the systems from which EWRTS retrieves information may be subject to the PRA.

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.

IL developed EWRTS to log and track information requests from USCIS, CBP, and ICE officers. Data entered into the database includes both DHS personnel and individuals of interest. IL records the following information in EWRTS for each request:

Dates/Times: IL records the dates and time of actions to track and process requests.

Name of Officer: IL uses the full name of the USCIS, ICE, or CBP officer to document who initiated the request.

Phone Number: IL uses the phone number to contact the USCIS, ICE, or CBP officer.

Fax Number: IL uses the fax number to send A-File content to the requester.

Email Address: IL uses to the email address to electronically send A-File content to the requester.[4]

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[4] IL generally does not encrypt or password protect internal emails containing SPII, with the exception of SSN, because the underlying encryption across the DHS backbone and the recipient's need for the information is related

Program: IL records the three letter code for the Component (USCIS, CBP, or ICE), which is used for statistical reporting.

User ID: IL uses the User ID to track the productivity and accuracy of the employee creating the record and those who update the record.

Memo Field: IL uses the memo field to record a brief description of the information or documentation needed from the A-File and any special instructions regarding processing.

A-Number: IL uses the A-Number to identify and locate the specific file from which information or documentation is needed.

EWRTS Tracking Number: IL uses the EWRTS Tracking Number to identify and track the status of the request.

File Location: IL records and uses the file location to locate the file so it can be pulled by the contractor and delivered to IL.

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

The information contained in EWRTS is collected from USCIS, CBP, and ICE officers who require information from an A-File to take action on a case.

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. EWRTS does not collect information from commercial or publicly available data sources.

2.4 Discuss how accuracy of the data is ensured.

IL collects information directly from USCIS, CBP, and ICE officers to ensure accuracy. Additionally, IL personnel verify the requester's credentials using the DHS Global Address List (GAL). The search results display the requestor's contact information and respective Component. This information is compared against the information provided in the initial request to IL. If the requester is not listed in the GAL, IL will not process the request. Additionally, EWRTS records are randomly reviewed for quality assurance purposes to ensure that records were created correctly and that all appropriate updates have been made when cases are processed.

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to his or her official duties. IL email practices are aligned with DHS and USCIS policy.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that the disclosure of information is incompatible with the original purpose of collection.

Mitigation: Although USCIS is the custodian of the A-File, USCIS, CBP, and ICE create and use A-Files in the course of performing their respective missions. USCIS, CBP and ICE are authorized to create, access, and modify A-Files in the course of their respective immigration, border security, and law enforcement missions. IL only discloses A-Files to individuals within these three components because they share all have mission requirements that are consistent with the original purpose of collect (to serve as the official immigration record of persons who are not citizens or nationals of the United States).

To ensure that IL, as the custodian of the A-File, only releases A-Files consistent with this purposes, IL developed EWRTS to accurately track A-File information requests from USCIS, CBP, and ICE officers and ensure timely and appropriate responses. IL personnel verify the requestor's credentials to ensure the requester is authorized to receive data from the A-File and information is sent to the correct requester.

Privacy Risk: There is a risk the NRC is collecting irrelevant information to respond to information requests.

Mitigation: IL mitigates the risk of collecting irrelevant information by limiting the information collected from USCIS, CBP, and ICE officers requesting A-File content. The system is configured to collect the requesters contact information and data subject's A-Number. This is the minimum amount of information necessary to process an A-File information request and provide specific documents to the requester. The system also captures processing data (date/time) for statistical purposes.

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.

IL uses EWRTS and its information to perform intake and track A-File information requests from USCIS, CBP, and ICE officers.

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?

Access to EWRTS is limited to IL and contractor employees located at the NRC with a need-to-know. There are no other Components with assigned roles and responsibilities within the system.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that authorized users could exceed their authority and use the data for unofficial purposes.

Mitigation: All records are protected from unauthorized access and use through appropriate administrative, physical, and technical safeguards that include restricting access to authorized personnel who have a need-to-know. USCIS limits access to PII by employing role-based access. All IL employees are thoroughly trained regarding the use of the database and the sensitivity of the information contained in A-Files. Additionally, all IL employees take the annual security and privacy awareness training.

Privacy Risk: Unauthorized users may gain access to EWRTS.

Mitigation: Access to EWRTS is granted to only a limited number of users within NRC for the purpose of logging information requests from USCIS, CBP, and ICE officers; recording the actions taken by IMFS to respond to those requests; and preparing statistical reports. EWRTS users must have access to the USCIS network and have USCIS credentials. Users must authenticate their credentials to gain access to the system.

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.

EWRTS does not collect information directly from the individual. Instead, IL collects A-

File information requests directly from USCIS, CBP, and ICE officers. The publication of this PIA provides general notice to individuals that IL uses EWRTS to facilitate A-File information requests from USCIS, CBP, and ICE officers. Additionally, individuals are notified of the collection, uses, and routine uses of the A-File in the DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records SORN.

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

Not applicable. EWRTS does not collect information directly from the individual. USCIS, CBP, and ICE employees require access to the A-File regularly to assist in adjudicating benefits, investigating immigration violations, and enforcing border protections. USCIS, CBP, and ICE employees seeking access to A-File contents provide their government-issued contact information and the data subject's A-number. This information is used to retrieve and provide the A-File contents.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk of insufficient notice describing the purpose, use, and effects of the collection to the individual.

Mitigation: USCIS published this PIA to provide general notice to individuals that IL uses EWRTS to facilitate A-File information requests from USCIS, CBP, and ICE officers.

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.

EWRTS records are destroyed by an authorized user two years after the date of the latest entry in accordance with General Record Schedule 28, Item 8.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: IL may retain information longer than necessary when the information request is complete.

Mitigation: The risk is mitigated by the fact that records are deleted two years after the last entry. The two year disposition schedule is consistent with the stated purpose and mission of EWRTS, which is to maintain a complete and accurate history of information requests from USCIS, CBP, and ICE.

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.

No.

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

Not applicable.

6.3   Does the project place limitations on re-dissemination?

Not applicable.

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

Not applicable.

6.5   <u>Privacy Impact Analysis</u>: Related to Information Sharing

There are no risks related to information sharing because USCIS does not share information externally from EWRTS.

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?

EWRTS is an internal tool used to intake and track information requests from USCIS, ICE, and CBP officers. Information in EWRTS includes contact information of DHS personnel requesting information and A-numbers for subjects of interest. EWRTS is not used to support the processing of immigration-related benefits and requests. USCIS, CBP, and ICE officers are able to request previously submitted case status information by contacting IL.

Any individual may gain access to his or her USCIS records and request an account of disclosure 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. The information requested may, however, be exempt from disclosure under the Privacy Act because sometimes files contain law enforcement sensitive information and the release of 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?

EWRTS is an internal tool used to intake and track information requests from USCIS, CBP, and ICE. Information in EWRTS includes contact information of DHS personnel requesting information and A-numbers for subjects of interest. EWRTS is not used to support the processing of immigration-related benefits and requests. Individuals seeking to contest or amend information contained in EWRTS as discussed in Section 7.1, should submit Privacy Act requests. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. The record must be identified in the same manner as described for making a request for access.

USCIS, CBP, and ICE officers may correct inaccurate or erroneous information requests by contacting IL directly. IL personnel review data amendments from individuals inquiring about their data and make appropriate revisions. This allows USCIS, CBP, and ICE officers to update submitted information at any time.

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 the privacy compliance documentation covering the A-File and through USCIS personnel who interact with them. Specifically, the SORNs set forth in Section 1.2 provide individuals with guidance regarding the procedures for correcting information. This PIA also provides similar notice. USCIS, CBP, and ICE officers may correct inaccurate or erroneous information requests by contacting IL directly.

7.4 <u>Privacy Impact Analysis</u>: Related to Redress

Privacy Risk: There is a privacy risk that an individual will be unable to access and amend his or her records.

Mitigation: USCIS has mitigated this risk to the best extent possible. EWRTS is an internal tool used to intake and track information requests from USCIS, CBP, and ICE. Information in EWRTS includes contact information of DHS personnel requesting information and A-numbers for subjects of interest.

EWRTS is not used in support of processing immigration-related benefits and requests. IL provides USCIS, CBP, and ICE requestors A-File documents prefaced by a cover sheet with the "For Official Use Only" warning which states that the receiver should destroy the documents if they were sent in error. If in accurate information was provided to the requestor, the requestor is to notify IL to obtain correct information.

Individuals who interact with USCIS, ICE and CBP with actions prescribed by the INA and other regulatory guidelines are issued A-Files. An A-File may contain forms, correspondence, certain biometrics, and other evidence, to support the decision to grant or deny immigration-related benefits and provide information that may be used in enforcement actions. The information from the A-File is used to grant or deny immigration related benefits or to support enforcement actions initiated against those who violate immigration laws. Individuals are afforded the opportunity to and provided notice to amend their information in accordance with Alien File, Index, and National File Tracking SORN.

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?

IL ensures that the practices stated in this PIA are followed by leveraging training, policies, 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 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. The "Computer Security Awareness" training examines appropriate technical, physical, personnel, and administrative controls that safeguard information.

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 is limited to only those persons employed in IL and a very limited number of contract employees who have a need-to-know in order to perform their duties. This need-to-know is determined by the respective responsibilities of the employee. Responsibilities include creating new records in EWRTS, updating existing records in EWRTS, and generating statistical reports (supervisory function). Access to EWRTS is granted by NRC IT personnel upon the request and authorization of a supervisor in IL.

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?

Not applicable. EWRTS does not share information externally or provide external users access to the system. However, USCIS has formal review and approval process in place for user access. Any new use of information and/or new access requests for USCIS systems must be approved by the proper authorities prior to being carried out.

Responsible Officials

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Approval Signature

Original signed copy on file with DHS Privacy Office.

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