



Privacy Impact Assessment  
for the

# **USCIS International Biometric Processing Services**

**DHS/USCIS/PIA-048(a)**

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## Abstract

Many countries now require biometric data from individuals filing applications for immigration related benefits. Several countries have partnered with the Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) to collect the requisite biometrics and limited biographical information on behalf of their immigration services. On behalf of the country, USCIS collects biometric and biographic information at its 138 Application Support Centers and deletes the records immediately after it receives confirmation that the partner country has received the information. USCIS previously published DHS/USCIS/PIA-048, USCIS International Visa Project, to address USCIS collection of biometric and biographic information on behalf of other countries for international visa processing. USCIS is updating, renaming, and replacing that PIA with this PIA to address expansion of the biometric services USCIS provides to partner countries.

## Overview

The United States Citizenship and Immigration Services (USCIS) collects biometrics and limited biographic information on behalf of several countries that require biometric and biographic data as part of their visa issuance process for visitors to their respective countries. Individuals who file visa applications with these countries are required to submit biometric and biographic information to increase the security of the partner country's international visa issuance process.<sup>1</sup> USCIS is updating, renaming, and reissuing this PIA to describe the biometric capture services USCIS provides to partner countries. USCIS now provides biometric services to partner countries for applicants seeking immigration-related benefits to include visa and naturalization applications.

Appendices to this PIA list the partner country and what service(s) USCIS provides to it, which may also include other services beyond visa and naturalization cases.

### *Background*

USCIS offers a fee-based service to international partners to collect biometric and limited biographic information from individuals who are filing immigration-related benefit applications with partner countries and who are physically present in the United States. Section 573 of the Foreign Assistance Act of 1961 authorizes U.S. agencies to furnish services to foreign countries, at the President's discretion, in furtherance of their anti-terrorism efforts.<sup>2</sup> USCIS provides this service to certain partner countries for a fee agreed upon by each country and set forth in a Memorandum of Understanding (MOU).

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<sup>1</sup> Currently, USCIS only provides biometric capture services to the United Kingdom and Canada. USCIS plans to expand these services to more countries and plans to update the PIA appendix each time new countries are added.

<sup>2</sup> 22 U.S.C. § 2349aa.



USCIS has 136 USCIS Application Service Centers (ASC) located throughout the United States (and its territories) that are equipped to collect this information. Applicants may use one of these services, without which they might have to travel as far as several states away to provide their biometrics at the partner country's embassy or consulate.

USCIS's collaboration with the United Kingdom (U.K.) since Fiscal Year 2008 demonstrates the success of this effort and suggests this service can assist other countries as well.<sup>3</sup> USCIS ASCs enables partner countries to achieve a low-cost, fast, effective, and comprehensive biometrically-enabled visa system, which helps them to create a more secure border and reduce fraud.

Biometric visa partnerships are beneficial to DHS because the collected fingerprints and photographs are transmitted back to the U.S. Government for matching against DHS's Automated Biometric Identification System (IDENT),<sup>4</sup> as described below.

### *USCIS Collection of Information*

The process begins when an individual seeking a benefit from a partner country completes an applicable an online benefit application and submits it with the associated fee to the partner country. After submitting the application online, the partner country's website directs the applicant to schedule a biometric appointment at a USCIS ASC. Generally, the country's website provides the applicant with available timeslots at surrounding ASCs – initially given to the partner country by USCIS. Upon selecting an appointment time, the individual is instructed to print out the appointment letter, which includes country-specific instructions, including what if any supporting materials (e.g., photo identification, travel document) must be brought to the appointment.. Upon arrival at the appointment, ASC personnel check the individual's photo identification against the person presenting him or herself, to confirm identity, and then confirm the appointment.

ASC personnel collect the applicant's biographic information<sup>5</sup> (e.g., full name, date of birth, country of birth, sex, and nationality) from the appointment letter and/or photo identification and capture the individual's biometrics (i.e., fingerprints, photographs, and signature). The fingerprints are collected using an electronic fingerprint machine, which captures an image of all 10-fingerprint digits.<sup>6</sup> ASC personnel then complete a final quality assurance review to ensure that USCIS captured all relevant information specific to the partner country. ASC personnel stamp the individual's appointment letter for proof that he or she submitted biometrics to USCIS. The ASC transmits the information to the partner country through the USCIS Enterprise Service Bus (ESB).<sup>7</sup>

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<sup>3</sup> The U.K. was the first country to partner with the USCIS for this project.

<sup>4</sup> See DHS/NPPD/USVISIT/PIA-002 IDENT PIA available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).

<sup>5</sup> The biographic information collected may vary by country; please see the appendices to this PIA for complete details.

<sup>6</sup> Ordinarily, all ten fingerprints will be captured in this process; however, if one or more fingers are not available (for instance, because of amputation) then USCIS will capture as many fingers as are available.

<sup>7</sup> The DHS/USCIS/PIA-008 Enterprise Service Bus (ESB) PIA can be found at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## *Transmission*

The transmission of biometric information occurs through ESB. USCIS temporarily retains biographical information and biometrics captured pending notice of successful transmission to the partner country. USCIS then deletes both the biographic and biometric information after the partner country confirms receipt of it. USCIS does not have the ability to retrieve any personally identifiable information (PII) associated with the immigration benefit applicant after the confirmation of the successful transfer from the partner country. The retention period for this information is generally less than 30 minutes and no longer than 12 hours.

In the unlikely event that any information fails to transmit, USCIS must determine why any information does not reach its destination.<sup>8</sup> USCIS can retrieve information that is waiting transmission to determine if the problem is equipment-or transmission-related. USCIS can do this by using a combination of the country code and USCIS-assigned random numbers that enables locating and tracking the case. Once USCIS identifies the problem, ASC personnel either resend the information to the partner country, or the partner country may require the applicant to come in for another biometric appointment.

To account for the transmission, USCIS retains an audit log that includes a transaction control number,<sup>9</sup> date and time of transaction, machine identification number, and employee identification number. This data is separate from, and cannot be linked to, the PII described above. USCIS retains the audit log data in USCIS enterprise Citizenship and Immigration Services Centralized Operational Repository (eCISCOR). eCISCOR provides backup information in support of billing and monthly reporting to be sent to the partner country.<sup>10</sup> USCIS advises the respective partner country that the audit logs are maintained online for 180 days and then stored offsite for seven years.

## *Authentication*

While USCIS ASCs will perform a preliminary check to confirm an individual's identity, USCIS does not authenticate an individual's identity on behalf of the partner country. ASC personnel only check the individual's photo identification and confirm the appointment against the appointment letter printed from the partner country website.

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<sup>8</sup> Technically, USCIS can determine whether a message has been not been sent or has not been received by the partner country. For example, if the VPN circuit is temporarily down, USCIS will hold the case and retry sending it every 10 minutes until it goes through. Once the case has gone through USCIS deletes the file. USCIS retains minimal information to enable USCIS to document the cases it processed on the partner country's behalf. This process enables USCIS to account for the amounts it charges each country. In the event of a transmission failure, the partner country would not know that an application was not received until the applicant submits his or her application materials documenting the appointment. If the fingerprints are not found in the partner country system, the partner country will contact USCIS and ask about the case. USCIS can then troubleshoot to determine whether a case was submitted but never sent.

<sup>9</sup> This is a combination of the partner country account code unique to each applicant and country and includes the date and time of the appointment.

<sup>10</sup> The DHS/USCIS/PIA-023-eCISCOR can be found at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



Upon receiving the biometric information from USCIS, the partner country uses the information to screen against other biometric databases in support of its decision to grant or deny the requested immigration benefit. The process each country follows is in accordance with its respective policies and Standard Operating Procedures (SOPs).

Additionally, the official authentication of an individual may occur when an individual who was granted a benefit enters the partner country. When the individual arrives in the country, an immigration officer greets him or her and asks to see photo identification, travel documents, and any other relevant information for verification purposes. The partner country's immigration officers perform the ultimate authentication of an individual's identity at the time of entry into the country. If the partner country has no prior information about the individual, the partner country will create a new record based on the submitted fingerprints and biographic information presented at the individual's time of entry. The officer verifies the documentation and asks the individual questions to determine if he or she meets the requirements for admission into the country. The partner country's officer officially determines if the individual is authorized to enter the country.

### *DHS Sharing*

USCIS does not share any of the data captured on behalf of the partner country with any other DHS agency, U.S. Government agency, or foreign entity other than the partner country. Pursuant to USCIS and partner country agreements, USCIS only sends the data associated with this project directly to the partner country. Some countries may elect, however, to screen the biometrics against the DHS biometric repository, IDENT. If a partner country chooses to send its biometrics back to DHS to run against IDENT, the sharing arrangements are governed by separate information sharing access agreements and vary by country. Further information about the sharing arrangement can be found in the IDENT PIA referenced above.

If a country chooses to pass back the biometric and biographic information collected by USCIS to DHS for screening against DHS biometric holdings, queries are made against the IDENT list of subjects of interest (e.g., "Subjects of interest" are people of interest to the United States or international law enforcement and/or intelligence agencies because of suspected or confirmed illegal activity). The DHS Office of Biometric Identity Management (OBIM) provides the country with results from the query, along with details of the analysis supporting the returned results, if applicable. These results and analyses assist the partner country in its determination of whether applicants are eligible to receive immigration benefits according to its applicable laws.



## 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?**

Section 573 of the Foreign Assistance Act of 1961 authorizes USCIS to conduct this fee-based service for partner countries in furtherance of their anti-terrorism efforts.<sup>11</sup> In addition, DHS has signed an MOU with each partner country that uses USCIS ASCs for this service. Each MOU defines the technical roles, responsibilities, and processes of USCIS and the partner country.

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

USCIS temporarily retains information collected on behalf of a partner country for only as long as it takes to successfully transmit the information to the partner country. While temporarily retained, USCIS does not retrieve the records using a unique personal identifier. USCIS transfers the biographic information and biometric capture to the partner country immediately after collection. USCIS deletes the information from ESB after the partner country provides confirmation of the successful transfer of the information. Therefore, no SORN is required to cover this collection.

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

Yes. USCIS completed a system security plan for ESB and eCISCOR. ESB and eCISCOR no longer receive an Authority to Operate but instead have been placed in Ongoing Authorization (OA), which means that ESB and eCISCOR security controls and organizational risks are assessed and analyzed at regular intervals (that vary by security control) to support risk-based security decisions. New privacy controls issued by the National Institute of Standards and Technology (NIST) are not impacted by OA.

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

No. USCIS does not retain information about the partner country (or non-U.S.) immigration benefit applicant beyond the point at which it receives confirmation that the partner country received the information. The retention period is routinely less than 30 minutes and no longer than 12 hours.

USCIS retains audit logs of the transactions within eCISCOR. USCIS maintains this information online for 180 days and then offsite for seven years. This requirement is per *Section*

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<sup>11</sup> 22 U.S.C. § 2349aa.



5.3 - *Audit Logs Maintained* of DHS Policy Directive 4300A, which states, “Audit trail records must be maintained online for at least 90 days, thereby allowing rapid access to recent information. Audit trails should be preserved for a period of seven years as part of managing records for each system to allow audit information to be placed online for analysis with reasonable ease.” This is the standard retention period specified by DHS Security Authorization policy for system audit data; therefore, no NARA retention schedule exists.

**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.**

No. The Paperwork Reduction Act applies only to collections by the U.S. Government. The service described in this PIA use applications and forms furnished and for use by international agencies.

## Section 2.0 Characterization of the Information

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

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

USCIS collects biographic information and captures biometric information from U.S. Lawful Permanent Residents, third country nationals, and U.S. citizens applying to a partner country for immigration benefits. This project collects information from those applicants who are physically present in the United States who are applying to a partner country for immigration benefits.

The information that USCIS obtains from these partner country immigration benefit applicants includes biographic and biometric data. The biometric information includes 10-print fingerprints captured by the electronic live scan device, photographs, and may also include signatures. The biographic data includes: first and last name; date of birth; country of birth; gender; travel document number; and nationality. These data elements will be assembled into a secure format for transmission from the ASC to the partner country.

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

USCIS collects information directly from partner country immigration benefit applicant who is physically present in the United States. USCIS captures a combination of fingerprints,



photographs, and signature (for some partner countries) electronically at one of USCIS's ASCs. USCIS uses the applicant's appointment letter generated by the partner country's application system and presented to USCIS at the ASC to capture the applicant's biographic information. Immigration benefit applicants may include third country nationals, U.S. Lawful Permanent Residents, and U.S. citizens.

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

No.

## **2.4 Discuss how accuracy of the data is ensured.**

The information USCIS collects and transfers to the partner country is assumed to be accurate because it is collected directly from the applicant. The appointment letter the partner country provides to the applicant contains the requisite biographic data. ASC personnel scan the appointment letter, which automatically inputs the biographic data into an electronic live scan device and combines it with the biometric data for transmission through ESB. . Manual data entry only occurs when ASC personnel need to correct data that is incorrectly scanned, or upon approval, when the applicant does not have his or her appointment letter. After biometric collection, ASC personnel also verify that the photographs and fingerprints they collect are clear and usable before transferring the information to the partner country.

## **2.5 Privacy Impact Analysis: Related to Characterization of the Information**

**Privacy Risk:** There is a risk that individuals applying for partner country benefits will assume that USCIS and the U.S. Government are retaining their information since they submitted the information at a USCIS facility.

**Mitigation:** This risk is partially mitigated. For the purposes of international biometric processing service, USCIS is acting as an agent for the identified partner country. It is the responsibility of the partner country to inform international immigration benefit applicants that USCIS will not retain their biometrics but only collect the biometrics on behalf of the partner country. The partner country generally addresses this issue on its respective website (see appendices) and informs the applicant that USCIS is collecting biometrics on behalf of the partner country and the information is not retained for any other purpose.

Furthermore, because some partner countries submit their applicant biometrics for screening against DHS IDENT – which does retain biometric information – an applicant may assume that USCIS is the entity retaining this information, rather than OBIM. Again, USCIS provides notice about its retention of biometric information in this PIA. Because the biometric



matching that the partner country may have with DHS happens outside of the agent relationship with USCIS, the IDENT PIA provides notice on what information OBIM is retains on behalf of the Department and for how long.

**Privacy Risk:** There is a risk that the information sent to the partner country may be inaccurate.

**Mitigation:** All information that USCIS provides to the partner country is collected directly from the international immigration benefit applicant. USCIS personnel compare the identity of the individual present for a biometric appointment against information provided on the applicant appointment letter. If USCIS determines the individual is the person applying for an international immigration benefit, USCIS collects limited biographic information from the appointment letter and biometric information and sends it to the partner country. However, once the partner country receives the information from USCIS, it is the responsibility of the partner country to confirm the accuracy of the applicant data and to determine if the individual is eligible to receive immigration benefits.

## Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

### **3.1 Describe how and why the project uses the information.**

USCIS does not use the information collected as part of this program. USCIS serves only as the front-end data gathering agent on behalf of the partner country. USCIS transfers the information to the partner country to use during the review of the application for that country to ultimately grant or deny an immigration benefit. Appendices to this PIA include a detailed description of how each country uses the biometric information.

If the partner country does not confirm receipt of the information, USCIS must determine why the information did not reach its destination. USCIS can retrieve information that is awaiting transmission to determine if the problem is equipment-or transmission-related. USCIS can do this by using a combination of the country code and USCIS-assigned random numbers that enable locating and tracking the case. Once USCIS identifies the problem, ASC personnel either resend the information to the partner country, or may require the applicant to come in for another biometric appointment.



**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?**

No. USCIS does not share this information with DHS components. Participating partner countries may opt to share data collected as part of this program with DHS OBIM.

**3.4 Privacy Impact Analysis: Related to the Uses of Information**

**Privacy Risk:** There is a risk that the information collected may be used for purposes other than sending the data to the partner country.

**Mitigation:** This risk is mitigated by USCIS only temporarily retaining the information collected on behalf of the partner country. USCIS collects this information, temporarily stores it on ESB, transfers it to the partner country, and then purges it once USCIS confirms the partner country received the data. Because USCIS does not retain this information and it is not retrievable in the future, USCIS cannot use the data for any reason other than the stated purpose. This risk is also mitigated by the terms of the agreements with partner countries which limit USCIS use of information.

## 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.**

The partner countries are responsible for providing notice to these individuals. USCIS provides notice of the collection through this PIA.

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

Individuals who apply for partner country immigration benefits may be required by the partner country to submit their biometrics and limited biographical information. Only the partner



country, not the U.S. Government, may determine if an individual has an opportunity to decline to provide the information.

Additionally, the use of a USCIS ASC is voluntary. A partner country immigration benefit applicant may choose to submit his or her application and biometrics using another approved method, such as submitting biographic and biometric information through the relevant embassy or consulate. The applicant should contact the partner country for other options.

### **4.3 Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that applicants for an international benefit will not receive explicit notice that time of biometrics collection.

**Mitigation:** USCIS has 138 ASCs and manages over 3.6 million biometric appointments each year. Biometric capture services for partner countries account for a relatively small percentage of appointments (in comparison to the 3.6 million total each year) so providing notice to UK and Canada visa applicants has solely been the responsibility of the partner country.

**Privacy Risk:** There is a risk that USCIS and the partner country may provide insufficient notice to the applicant of the purpose and use of his or her information.

**Mitigation:** USCIS mitigates this risk by providing notice to the applicant through the publication of this PIA and information on [www.uscis.gov](http://www.uscis.gov). Additionally, each partner country publishes its immigration benefit application requirements on its website to inform applicants, and provides additional notice on this program in the appointment letter. Appendices to this PIA discuss specific notice provided by each partner country.

## **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 retains information until it receives confirmation that the partner country received the information. The retention period is routinely less than 30 minutes and no longer than 12 hours (but only long enough to complete the processing). Because USCIS only retains these records for such a short period of time, no retention schedule is needed for the international applicant data.

USCIS retains audit logs of these transactions within ESB. This data is available online for a period of 180 days in an electronic file. The only data that is retained is the electronic log of the transaction and not the content of the transaction. Offsite retention of this data is for seven years in electronic format. This requirement is per *Section 5.3 - Audit Logs Maintained* of the DHS - 4300A, which states, "Audit trail records must be maintained online for at least 90 days, thereby



allowing rapid access to recent information. Audit trails should be preserved for a period of seven years as part of managing records for each system to allow audit information to be placed online for analysis with reasonable ease.” This is the standard retention period specified by DHS Security Authorization Process policy for system audit data.

## **5.2 Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** There is a risk to data minimization that USCIS is collecting and retaining information that is not related to the USCIS mission.

**Mitigation:** USCIS is assisting partner countries by collecting information that is needed to adjudicate international immigration benefits, pursuant to Section 573 of the Foreign Assistance Act of 1961. USCIS collects the information on behalf of the partner country and sends the applicant information directly to the partner country. USCIS retains the information for the brief time necessary to ensure a successful transfer to the partner country. If a failure in transmission occurs, the brief retention period allows USCIS to resend the record to ensure a successful transmission of information to the partner country. Once USCIS receives confirmation that the transfer of data was successful, ESB deletes the biometric and biographic records.

## **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 has signed MOUs in place with each partner country. See appendices to this PIA for details. Appendices will be added as USCIS enters into additional MOUs.

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

No SORN is required for this external sharing because the data is not maintained in a system of records under the Privacy Act.

### **6.3 Does the project place limitations on re-dissemination?**

All of the MOUs that are currently in place discuss limitations on re-dissemination. Appendices to this PIA will discuss these limitations with USCIS’s external partners.



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

This project maintains records of disclosures through audit logs. The audit logs include a unique transaction control number, date and time of transaction, machine identification number, and employee identification number. This data is separate from, and cannot be tied to, the PII collected at the ASC appointment. USCIS retains this data for billing purposes.

## **6.5 Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** There is a privacy risk of unauthorized disclosure.

**Mitigation:** Because USCIS only retains the information for a short period of time, the risk of unauthorized disclosure is very limited. This limited risk is mitigated in a number of ways. First, all external partners are required to sign information sharing agreements or MOUs. These documents outline the limitations on dissemination and the steps needed in order for parties to appropriately disseminate information outside of the Department, if applicable. Additionally, all users that handle the data associated with this project must conform to appropriate security and privacy policies, follow established rules of behavior, and receive training regarding the security of DHS 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?**

There is no long-term retention of records associated with this project. USCIS captures and transmits the information on behalf of the partner country. Because USCIS does not retrieve the information by personal identifier and it is purged after the partner country confirms the receipt of the information, USCIS cannot provide the applicant with access to his or her requested information. Therefore, USCIS recommends contacting the respective partner country directly. Appendices to this PIA discuss these procedures.

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

See the appendices to this PIA for a detailed description of the respective partner country's redress policies.



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

See the appendices to this PIA for a detailed description of each partner country's redress policies.

### **7.4 Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** USCIS does not provide any redress to international immigration benefit applicants.

**Mitigation:** USCIS cannot mitigate this risk because once the partner country notifies USCIS that it received the information, USCIS deletes the individual's information. What redress a partner country provides is within that country's control. To the extent possible, this risk is mitigated by having each partner country provide its own form of redress to applicants.

## **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?**

DHS security specifications require auditing capabilities that log the activity of each user in order to reduce the possibility of misuse and inappropriate dissemination of information. In accordance with DHS security guidelines, USCIS systems use auditing capabilities that log user activity. All user actions are tracked via audit logs to identify audit information by employee identification number, date, and time of transaction. These audit logs are also maintained to keep track of monthly billing and reporting inquiries to each country.

### **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 and Privacy Act Statements). The Computer Security Awareness training examines appropriate technical, physical, personnel, and administrative controls to safeguard information. Additionally, all employees employed by the receiving agency are given specific training on how to safeguard applicant data.



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

Only USCIS ASC personnel with a valid need-to-know have access to the information they collect as part of this project. All ASC personnel who collect information as part of this project have security clearances that are documented by the USCIS Office of Security and the ASC Program Office. Additionally, the comprehensive ASC SOPs outline in detail which personnel have access to biometric collection devices.

### **8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?**

USCIS has a formal review and approval process in place for new sharing agreements. Any new sharing agreements, use of information, or new access requests for USCIS systems must go through the USCIS change control process and must be approved by the proper authorities prior to sharing information within and outside of DHS.

## **Responsible Officials**

Donald K. Hawkins  
Privacy Officer  
U.S. Citizenship and Immigration Services  
Department of Homeland Security

## **Approval Signature**

Original signed copy on file with the DHS Privacy Office.

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Karen L. Neuman  
Chief Privacy Officer  
Department of Homeland Security



## Appendix A:

### USCIS Biometric Capturing Support and Services to UK Visa and Immigration (UKVI), Home Office

#### Purpose and Use:

USCIS ASCs collect applicant biometric and biographic information on behalf of the UKVI, Home Office. UKVI, Home Office uses this information to assist it in determining whether applicants are eligible to obtain visas or naturalization according to applicable U.K. laws.

#### MOU:

An MOU was signed on November 16, 2007, between the Director of Network Operations, UKBA (now known as UKVI), and the Director, U.S. Citizenship and Immigration Services that authorizes USCIS to collect biometrics and biographic data on behalf of the U.K. for visa processing.

USCIS and UKVI have also drafted a Letter of Intent that will authorize USCIS to collect biometrics and biographic data on behalf of the U.K. for naturalization.

#### Data Elements:

Applicants submit their biographic information via their immigration benefit application. USCIS ASC personnel collect the biometric data from the appointment letters that each applicant brings with him or her to the biometric collection appointment. Through this project, the following categories of information are collected:

Limited biographic information: full name, date of birth, country of birth, gender, travel document number, and nationality.

Biometrics: 10 fingerprints, photograph, and signature.

#### Transmission:

The transmission of biometric information to the UKVI, Home Office occurs immediately after USCIS ASC personnel capture the biometrics through the secure electronic method. The ASC transmits the information to the UK through ESB.

#### Additional Sharing:

The UKVI, Home Office has a separate agreement in place with OBIM to share biometric and biographic data for identifying derogatory information. Refer to the IDENT PIA for further details about this information exchange.<sup>12</sup>

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<sup>12</sup> See DHS/NPPD/USVISIT/PIA-002 IDENT PIA, available at [www.dhs.gov/privacy](http://www.dhs.gov/privacy).



## **Notice:**

UKVI's website makes full disclosure of the need to provide biometrics for processing an immigration benefit application. UKVI also provides notice to the applicant to appear at an ASC for biometrics collection in the UKVI appointment letter. UKVI has provided additional information for applicants on its website at: <https://www.gov.uk/browse/visas-immigration>.

## **Correction and Redress:**

The UKVI, Home Office is solely responsible for granting or denying U.K. immigration benefit applications. The UKVI, Home Office determines as a result of redress request whether to change any of the information that was initially provided by a USCIS ASC, and whether the request would have any impact on the adjudication process of the UKVI, Home Office. The appeals process for handling inaccurate or erroneous information on behalf of the UKVI, Home Office is solely the responsibility of the United Kingdom and is available on the UKVI, Home Office website at <https://www.gov.uk/browse/visas-immigration>.

If UKVI, Home Office denies the immigration benefit, it will provide a letter of denial and appeal to the applicant. The appeals process of the UKVI, Home Office varies based on the circumstances of the denial. The denial letter details the process the applicant must follow to appeal the decision. If UKVI, Home Office denies an immigration benefit, the applicant may refer to the UKVI website at: <https://www.gov.uk/browse/visas-immigration>.



## Appendix B:

### USCIS Biometric Capturing Support and Services to Immigration, Refugees and Citizenship Canada (IRCC) formally known as Citizenship and Immigration Canada (CIC)

#### Purpose and Use:

USCIS ASCs collect Canadian applicant biometric and biographic information on behalf of IRCC. IRCC uses this information to determine whether (1) visa applicants for entry into Canada are eligible to obtain visas or other travel documents, and (2) applicants meet the eligibility criteria to receive Canadian permanent residence according to applicable Canadian laws.

#### MOU:

An MOU was initially signed on September 16, 2012, between the Deputy Minister of Citizenship and Immigration Canada, and the Director of U.S. Citizenship and Immigration Services. In 2018, Canada expanded the scope of biometrics collection to include applicants for legal permanent residency and amended the MOU with USCIS to account for this new population.

#### Data Elements:

Applicants submit their biographic information via their Canadian immigration benefit application. USCIS ASC personnel collect the biometric and limited biographic data on behalf of the IRCC. Through this project, the following categories of information are collected:

Limited biographic information: full name, date of birth, country of birth, sex, and nationality.

Biometrics: 10 fingerprints, photograph, and signature.

#### Transmission:

The transmission of biometric and limited biographic information to the IRCC occurs immediately after USCIS ASC personnel capture the information through the prescribed secure electronic method. The ASC transmits the information to Canada through ESB2 in an Electronic Fingerprint Transmission Specification (EFTS), a National Institute of Standards and Technology (NIST) standard file.

Data encoding – MIME attachment

Messaging protocol – SMTP

Transport – VPN tunnel

Physical Network – Internet

#### Additional Sharing:



Currently, USCIS only provides the captured biometrics and associated limited biographic data to Canada.

**Notice:**

The IRCC’s website provides notice to all of its applicants of his or her requirements to provide biometrics in conjunction with applications for requested Canadian immigration benefits.<sup>13</sup> Furthermore, in July 2018, USCIS and Canada implemented “myBiometrics,” a service that allows Canadian immigration benefit applicants residing in the U.S. to schedule their biometrics appointments at an ASC. myBiometrics shares a Privacy Notice describing why USCIS is collecting personal information from individuals seeking Canadian immigration benefits prior to the collection of any information. This enhancement is discussed in the DHS/USCIS/PIA-057(a) National Appointment Scheduling System PIA Update.<sup>14</sup>

**Correction and Redress:**

The IRCC is solely responsible for granting or denying IRCC applications. The IRCC determines as a result of a redress request whether to make any changes or corrections to the information collected by USCIS at its ASCs, and whether the redress or correction request would have any impact on the adjudication process of the IRCC. The appeals process for handling inaccurate or erroneous information on behalf of the IRCC is solely the responsibility of Canada. Information related to the Canadian Correction/Redress process is available on the IRCC website at <http://www.cic.gc.ca/>.

If the IRCC denies the Canadian immigration benefit, they will provide a letter of immigration benefit denial and appeal to the applicant. The appeals process of the IRCC varies based on the circumstances of the denial. The denial letter will detail the process the applicant must follow to appeal the decision. If IRCC denies a Canadian immigration benefit, the applicant may refer to the IRCC website at <http://www.cic.gc.ca/> for more information.

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<sup>13</sup> See <https://www.canada.ca/en/immigration-refugees-citizenship/campaigns/biometrics/facts.html>.

<sup>14</sup> See <https://www.dhs.gov/publication/dhsuscispia-057-national-appointment-scheduling-system>.