



Privacy Impact Assessment
for the

Live Chat

DHS/USCIS/PIA-065

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Contact Point

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Abstract

The U.S. Citizenship and Immigration Services (USCIS) Customer Engagement Center (CEC) continues to expand its accessibility to the public by enhancing its methods of communication beyond the traditional call centers. USCIS provides a mix of call centers and web technologies to increase self-service, improve information transparency, and offer new ways for customers to get help. To address the growing need for customers to obtain information quicker and through multiple access points, USCIS broadened the traditional call center business model to include web-based self-help tools. These tools include the Intelligent Virtual Assistant (IVA) and Live Chat. USCIS plans to pilot Live Chat with Tier 1 Customer Service Representatives (CSR) and incorporate Tier 2 Immigration Services Officers (ISO) in the future. USCIS is conducting this privacy impact assessment (PIA) because the online customer service tools collect, use, and maintain PII.

Overview

U.S. Citizenship and Immigration Services (USCIS) is the component of the Department of Homeland Security (DHS) that receives approximately 14 million calls relating to immigration each year. USCIS operates the National Customer Service Center (NCSC) to provide telephonic assistance to customers calling about immigration services and benefits. USCIS NCSC customer service representatives are able to answer routine questions on a wide variety of topics related to immigration services and benefits, including ordering forms, processing times, and information on local offices and civil surgeons. In addition to general information and assistance, NCSC also assists customers with questions and concerns about a pending benefit request form.

To support and provide interactive assistance to online customers, USCIS launched Emma and Live Chat as the latest customer-friendly innovation from USCIS. Emma is an Intelligent Virtual Assistant (IVA). Live Chat is an online customer service software with live call center support. Both Emma and Live Chat are embedded within www.uscis.gov. An online chat system provides USCIS customers immediate access to help from customer service representatives.

Intelligent Virtual Assistant “Emma”

The IVA, also referred to as “Emma,” is a computer-generated virtual assistant designed to help online customers navigate the USCIS website and find answers to common immigration questions. The IVA interacts with customers by welcoming them to www.uscis.gov, helping them navigate next steps, and providing additional useful information. The IVA, which supports both English and Spanish, simulates real-world conversations and guides customers to information found on www.uscis.gov based on their chat input. The IVA reduces the amount of time visitors spend searching digital data and delivers them to the right location more quickly.



Customers seeking online assistance with routine questions are able to engage with Emma by simply clicking on the “Ask a Question” link. Once the Emma window is launched, a customer is able to type in his or her question and hit enter. Emma searches through the USCIS website to provide a brief answer and refers online customers to the most relevant information. Emma assists the online customer by providing immediate responses to questions about all of USCIS’ services, guiding online customers through the USCIS website, and finding information based on language and search terms. Emma may also offer links leading to related areas of interest below her response.

An online customer may reach a point in the IVA interaction when Emma is no longer able to provide assistance. If the online customers reach a point in the IVA when their questions cannot be answered, the customer is offered the opportunity to open a chat session using the built in chat client. Emma is integrated with a Live Chat feature to assist customers with both general and case-specific information. Once the customer accepts the chat offer, then the chat application opens and a request is sent to the Genesys eServices chat server. Before a customer is connected to a Live Chat agent, the following information is collected by the IVA via a series of questions and passed over a secure data server to the agent handling the chat:

- Language (English or Spanish only);
- Topic (general immigration topic that is the nature of his or her inquiry);
- Case on file (yes or no) and associated receipt number (if applicable); and
- Short comments explaining why he or she wishes to speak with an agent.

Customers are then placed in the appropriate skilled queue and wait to be connected with the next available Tier 1 Customer Service Representatives (CSR) agent. Upon connection, the customer is alerted he or she is now speaking with a USCIS CSR within the same secure window and may begin typing his or her question. The information is also passed over to the representative from the IVA to the agent’s desktop.

The IVA only maintains the customer interaction (i.e., language preference, general immigration topic, receipt number, and short comments) data in its memory for the duration of the session. This information is neither stored nor retained for analytical or improvement purposes. Once the interaction with the IVA is complete, the collected/attached data is cleared from the servers without future storage or use.

USCIS Live Chat – Tier 1

Live Chat is a new electronic avenue of communication for customers who wish to speak directly with USCIS to obtain general and limited case-specific information. The information collected from Emma is passed to the Tier 1 CSR along with the complete IVA transcript. Tier 1 Contact Center CSRs offer the first level of live assistance. CSRs may be contract employees.



CSRs provide basic case-specific and general non-case-specific information to customers. Information provided by Tier 1 will be limited in verbiage and format by informational response scripts that are created and provided by USCIS. Tier 1 CSRs use the CRIS Customer Service Gateway, an application that displays the appropriate scripts for answering customers' general immigration questions.¹ These scripts are tailored for Tier 1 CSRs to explain laws, regulations, and USCIS forms information in response to customer questions.

Tier 1 agents are able use to chat with customers in a secure chat window. The live CSR Tier 1 agent is provided with data from the IVA and conducts the customer dialog via a secure server connection. Upon answering a Live Chat, all Tier 1 CSRs must identify the agency and provide their name. In addition, Tier 1 CSRs provide a unique identification agent number. Tier 1 CSRs must adhere to the preapproved scripted responses and are prohibited from providing case specific information that is not in the scripted responses. The scripted material is used by the CSRs to respond to general questions, process various Service Requests, and to provide status updates on benefit request forms submitted. The information provided at Tier 1 is basic and mirrors the information available through the USCIS website.

All Tier 1 USCIS Live Chat agents are trained in scripts, which have been amended and catered toward chat interactions. Viewing Live Chat as a new avenue of communication for USCIS' customer base, agents will field inquiries alike in nature to those they already handle on the phones, so the content of their training will be the same.² Non-sensitive, case-specific information may be drawn by the Tier 1 agent from systems to which they have been granted access, such as the Person Centric Query Service (PCQS)³ and the National File Tracking System (NFTS).⁴

When customer inquiries cannot be resolved at Tier 1 or require more extensive or case-specific information, the Tier 1 agent will refer the customer to an e-request⁵ or submit a Service Request Management Tool (SRMT)⁶ for a NCSC Tier 2 callback. In this second level of support, NCSC Tier 2 ISOs, who have an immigration law background and appropriate training, assist with calls that require research within USCIS systems and databases or that involve complex immigration-related topics. At the end of the chat session, the chat is terminated when the customer or agent closes the chat window. A chat session will also terminate after ten minutes of inactivity.

¹ See DHS/USCIS/PIA-019 Customer Relationship Interface System (CRIS), available at www.dhs.gov/privacy.

² See DHS/USCIS/PIA-054 National Customer Service Center, available at www.dhs.gov/privacy.

³ See DHS/USCIS/PIA-010 Person Centric Query Service, available at www.dhs.gov/privacy.

⁴ See DHS/USCIS/PIA-032 National File Tracking System (NFTS), available at www.dhs.gov/privacy.

⁵ e-Request allows customers to inquire about applications and petitions submitted to USCIS. To submit an e-Request, please visit <https://egov.uscis.gov/e-request/Intro.do>.

⁶ Service Request Management Tool (SRMT) allows USCIS Customer Service staff to create service requests and direct them to Service Centers, local Field Offices, and Asylum Offices where the customer's application or petition is in process.



Tier 2

In the future, Live Chats that cannot be answered by a Tier 1 CSR will be securely transferred to a Tier 2 ISO. Similar to the IVA-to-Tier 1 data transfer, the Tier 1 agent may ask for and pass along some customer information such as A-number, referral number (if created), customer type (applicant, petitioner, attorney, *etc.*), and any relevant brief comments that may assist the Tier 2 officer. At the Tier 2 level, the ISO will have the option to prompt the customer to log in with a proper account if the nature of the inquiry is case-specific.

Tier 2 Live Chat will be staffed with trained, certified, and experienced USCIS ISOs who provide clarification on benefits and services that are often complex or require the use of a variety of resource materials to resolve customer issues. The primary mission of Tier 2 of the call center is to address caller questions specific to his or her situation. Tier 2 ISOs answer calls from a customer when his or her particular case-specific questions are more complex than general inquiries. Live Chat will be built off the call center model. USCIS will update this PIA prior to the deployment Tier 2 Live Chat.

Customer Feedback

Emma offers customers a short feedback survey. After the IVA provides a response, it offers the survey by asking: “Was this helpful?” Customer is able to select ‘yes’ or ‘no. If the customer responds “No”, additional questions are asked to gather more information on the reason for the negative response. The survey is optional. For the Live Chat Pilot a survey will not be presented to the customer after the chat interaction. However, USCIS has future plans to include a survey after the Tier 1 survey.

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 Immigration and Nationality Act (INA) sections 101, 103, 221, and 245 authorize the collection of this information.

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

Live Chat collects, uses, maintains information in the following systems covered by the following SORNs:



- Alien File, Index, and National File Tracking System of Records;⁷ covers the paper and electronic copy A-File and/or Receipt File, supplemental forms, supplemental evidence, and identity history summaries (formally known as RAP sheets), but does not include all case processing and decisional data;
- Benefits Information System;⁸ covers the processing of immigrant and nonimmigrant benefit requests and does not cover requests for asylum and refugee status;
- Inter-Country Adoptions Security;⁹ covers the collection of information on prospective adoptive parents and other associated individuals in order to assess the suitability and eligibility of the prospective adoptive parent(s) to adopt; and
- Asylum Information and Pre-Screening,¹⁰ covers the collection and use of affirmative asylum applications, applications filed with USCIS for suspension of deportation, special rule cancellation of removal pursuant to the Nicaraguan Adjustment and Central American Relief Act,¹¹ credible fear screening cases,¹² reasonable fear screening cases, and asylum follow-to-join applications.¹³

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

Yes. The IVA and Live Chat are covered under the Enterprise Contact Center (ECC) ATO. The ECC Security Plan was completed August 21, 2014, and was subsequently accepted onto an Ongoing Authorization program. The Ongoing Authorization requires ECC to be reviewed on a monthly basis and to maintain its security posture in order to retain its ATO.

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

No. USCIS will start discussions with NARA to establish a retention schedule. The attached data that is passed from the IVA to the agent is deleted immediately once the interaction is complete. All personally identifiable information (PII) in the IVA interaction is masked but the interaction is stored for 2 years. CSPED proposes to maintain Live Chat interactions for 13 months. The Live Chat recommendation is based on several factors including storage costs and ensuring

⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 78 FR 69864 (November 21, 2013).

⁸ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (October 19, 2016).

⁹ DHS/USCIS-005 Inter-Country Adoptions Security, 81 FR 78614 (November 8, 2016).

¹⁰ DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015).

¹¹ See Nicaraguan Adjustment and Central American Relief Act, Pub. L. No. 105-100, § 203, 111 Stat. 2193, 2196-200 (1997).

¹² See 8 U.S.C. § 1225(b)(1)(B).

¹³ See 8 CFR § 208.31.



USCIS has a sufficient amount of data for analytical purposes. Note: Although the IVA and Live Chat interactions will be maintained, the attached data that the IVA passes to Tier 1 are only maintained for the duration of the chat session.

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 Customer Feedback Survey is subject to the PRA, and was issued OMB Control Number 1615-0121.

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.

Intelligent Virtual Assistant

The general functionality of the IVA does not require the collection of information from customers. The IVA functions similarly to a knowledgebase search tool. The online customer types a question into the IVA, and the IVA searches its knowledgebase for the appropriate response. The IVA also has the ability to navigate the customer to the relevant content page on www.uscis.gov.

Live Chat

Before connecting a customer to Live Chat agent, the IVA presents the customer with a series of questions that the customer must answer prior to being transferred to a Live Agent. The questions include the customer's preferred language, desired immigration topic, receipt number (if he or she has a case on file), and brief summary of the issue. The IVA passes the information collected to the Live Chat server. The IVA will not maintain the data in its database. However, the IVA will maintain the data in its memory for the duration of the chat session. Once the chat session ends, the information will be automatically deleted from the IVA's memory. In the future, if the Tier 1 agent must escalate the customer to Tier 2, the agent may ask for additional information.

Customer Feedback Survey

Emma provides a voluntary short feedback survey. The purpose of the survey is to determine the quality of the digital service from the end-user perspective. The online customer is



able to identify whether the information was helpful and how it was helpful. An open textbox is available to the online user to provide additional feedback.

Technical Information

On the backend, the IVA automatically collects session information about each interaction with Emma. This includes: date and time of visit, IVA content visited, mobile or desktop device. The IVA also collects and stores session/technical data (*e.g.*, IP addresses, server data) for 2 years. This data is not exposed or reported, and the information may be accessed by a database administrator.

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

Live Chat collects most of the information directly from the individual or his or her representative who is seeking case-related questions. During conversation session, agents are instructed to solicit the customer's name, date of birth, and address to verify identity as they do on the phones currently. More information may be used for secondary identification purposes such as age (different from date of birth (DOB)), country of birth, mother/father's first name (if available in the system used), or class of admission.

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

Yes. The IVA assists customers with general immigration questions. Most responses the IVA provides can also be found on www.uscis.gov web pages. Additionally, the Live Chat agent might refer the customer back to pages found on the uscis.gov website.

2.4 Discuss how accuracy of the data is ensured.

All IVA content has been approved by a team of government subject matter experts. For Live Chat interactions, the IVA and Live Chat agents ensure the accuracy of the information by collecting it directly from the individual or his or her representative. During the chat session, agents are instructed to solicit the customer's name, DOB, and address to verify his or her identity as they do on the phones currently. More information may be used for secondary identification purposes such as age (different from DOB), country of birth, mother/father's first name (if available in the system used), or class of admission.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that USCIS will collect more information than is necessary.



Mitigation: USCIS cannot prevent customers who are engaging with the IVA from asking questions that go beyond general inquiries. As a preventative measure, all sensitive data (*e.g.*, A-Number, receipt number, Social Security number) inadvertently entered by a customer is automatically masked by the IVA. Only the masked version appears in the database. Additionally, data collected by the IVA from the customer prior to transfer to Live Chat is only retained in the IVA's memory for the duration of the chat session. Once the session ends, the data is erased from the IVA's memory.

Once a customer reaches a Live Agent, the data collected by the IVA will show up in the agent's desktop and the agent may request further information from the customer to better assist the customer at the Tier 1 level or to pass along to the Tier 2 officer in the need of escalation. However, as with the transfer of information to the agent's desktop, any attached data going to the Tier 2 officer is only retained for the duration of the chat and is not stored as part of the chat interaction, nor as additional data. All appropriate information that may be solicited by the Tier 1 or Tier 2 agents is outlined and detailed in training, and is only relevant to the customer's case/inquiry.

Privacy Risk: There is a risk that USCIS will maintain inaccurate data.

Mitigation: USCIS mitigates this risk by limiting the amount of time USCIS retains the information. USCIS ensures information accuracy by collecting information directly from the online customer. Since NCSC involves a live conversation, USCIS cannot prevent the online customer from providing inaccurate information. The IVA only maintains customer inputs and approved USCIS responses. Data collected by the IVA from the customer prior to transfer to Live Chat is only retained in the IVA's memory for the duration of the chat session. Once the session ends, the data is erased from the IVA's memory. Live Chat logs also retain customer interactions with agents, however any PII will be masked in the databases housing this collected data. CSPED proposes to maintain Live Chat interactions for 13 months.

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.

The IVA uses the customer questions typed into its chat window to assist with locating resources within the USCIS webpage. The IVA analyzes each inquiry to determine the best response.

For Live Chat, the IVA collects a limited amount of data from the customer that is passed to the Live Agent representative so that the agent may assist the online customer to his or her best



ability. This information is only retained by the IVA for the duration of the chat session. Once the session ends, the information is deleted from the IVA's memory. The information is also deleted from the servers, which is where the Live Chat data is temporarily stored.

A Tier 1 CSR uses the customer data to assist the customer with his or her particular inquiry. Additionally, in the future, the Tier 1 CSR may request additional information of the customer to pass onto the Tier 2 officer. This information will be passed through the secure servers and retained only for the duration of the chat. The information passed from the Tier 1 agent to the Tier 2 officer may be used by the officer to access the customer's case information via internal systems such as PCQS and provide the customer with relevant updates. All systems access for Tier 1 agents and Tier 2 officers will be non-actionable and read-only, as those records currently are to those assisting by telephone.

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.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that USCIS will inadvertently share information without the records subject's consent.

Mitigation: This risk is partially mitigated. USCIS Live Chat CSRs serves as the first level of customer service support for online customers. Live Chat is a new electronic avenue of communication for customers who wish to speak directly with USCIS to obtain general and limited case-specific information. Live Chat CSRs use Frequently Asked Questions, scripts, and operational guidelines developed by USCIS to assist customers. Tier 1 CRS may collect limited PII from the customer directly to obtain case status information via Case Status Online or create a service request via SRMT. Beyond these systems, the Tier 1 CSRs do not have access to USCIS systems to share or disclose of case-specific information. If questions go beyond the scripted responses, the Tier 1 Live Chat agent will refer the customer to an e-request or submit a SRMT for a NCSC Tier 2 callback.

Additionally, only a limited number of USCIS approved personnel have access to the IVA and Live Chat conversation logs. These individuals have been trained to not share the conversation



logs outside of USCIS. Internally, the conversation logs are only shared on a “need to know” basis. Also, both the IVA and Live Chat capabilities do not interface with any other systems.

Privacy Risk: There is a risk that negative feedback from customer satisfaction assessments could be inappropriately used to adversely impact the individual’s benefit request.

Mitigation: USCIS mitigates this risk by making participation voluntary and by ensuring that USCIS only receives results and that the results are not associated with an individual or personal identifier.

Privacy Risk: There is a privacy risk that Emma and the Live Chat agent may provide inaccurate information to the online customer on which immigration and non-immigration benefit he or she may be eligible to apply or his or her pending benefit request.

Mitigation: Emma shares information provided and available through the USCIS website. USCIS content posted online undergoes an extensive clearance process to ensure accurate and up-to-date information is posed.

To mitigate this risk, Live Chat provides a disclaimer advising the online customer that the Live Chat experience is not intended to provide legal advice. Given the complex nature of each person’s case, USCIS cannot assume legal liability for the accuracy or completeness of any information discussed on or through this tool as immigration law is complex and the information provided on this website might not fully address the online customer’s situation. USCIS recommends consulting with a licensed attorney or with a non-profit agency accredited by the Board of Immigration Appeals for legal advice.

Tier 1 CRS Live Chat agents must also adhere to the preapproved scripted responses and are prohibited from providing case-specific information that is not in the scripted responses. The scripted material is used by the CSRs to respond to general questions, process various Service Requests, and to provide status updates on applications/petitions submitted. The information provided at Tier 1 is also basic and mirrors the information available through the USCIS website.

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.

USCIS provides a Privacy Notice prior to the collection of any information. The Privacy Notice informs the individual about the authority to collect the information requested, purposes



for collecting it, routine uses, and consequences of providing or declining to provide the information to USCIS. Additionally, Individuals are also provided general notice through the publication of this PIA and BIS SORN.

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

Use of IVA and Live Chat is voluntary. Before collecting information from the online customer, USCIS provides the customer with Privacy Notice that informs the customer that providing the requested information to USCIS is voluntary. The customer may decline to provide information by closing out the chat window or refusing to provide the Live Chat CSR or ISO with the requested information.

4.3 Privacy Impact Analysis: Related to Notice

There is no privacy risk with respect to notice. USCIS provides customers with sufficient notice and the ability to decline to provide information.

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 is working on establishing a record retention for IVA and Live Chat. USCIS proposes to maintain IVA conversation logs for 2 years. As an exception, customer data collected by the IVA prior to transferring the customer to a Live Chat agent will only be retained by the IVA for the duration of the chat session. Once the session ends, the information will be deleted from the memory of the IVA, as well as that of the secured chat server. The Live Chat conversation between the agent and the customer will be stored for 13 months from the day of the chat interaction. Additionally, in the future, the Tier 1 agent may solicit further PII from the customer, which will be passed through secured servers to the Tier 2 agent where it is also retained for the duration of the interaction only. USCIS will update this PIA prior to implementation of Tier 2 Live Chat. In accordance with federal records laws, USCIS will not destroy records until NARA approves a retention schedule for IVA and Chat.



5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: Emma and Live Chat do not have a NARA approved records retention schedule.

Mitigation: This risk is partially mitigated. USCIS working to develop a retention schedule for Emma and Live Chat and will not delete records until a retention schedule is approved by NARA.

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. USCIS does not share information collected by Live Chat with external entities.

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

USCIS does not share information collected by Live Chat with external entities.

6.3 Does the project place limitations on re-dissemination?

USCIS does not share information collected by Live Chat with external entities.

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

USCIS does not share information collected by Live Chat with external entities.

6.5 Privacy Impact Analysis: Related to Information Sharing

There is no privacy impact related to information sharing because information is not shared with external entities.



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?

The Live Chat feature allows an individual to electronically engage with USCIS about a pending benefit request form. Only U.S. citizens and lawful permanent residents may file a Privacy Act request. Any person, regardless of immigration status, may file a FOIA request. Individuals seeking access to their USCIS records may file a Freedom of Information Act (FOIA) or Privacy Act (PA) request. Any individual seeking to access his or her USCIS record may submit a request to following address:

National Records Center
FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO 64064-8010

The procedures for making a request for access to an individual's record can also be found on the USCIS web site.

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

Under the Privacy Act, U.S. citizens and lawful permanent residents, as well as other persons with covered records are covered by the Judicial Redress Act (JRA), are afforded the ability to correct information by filing a Privacy Act Amendment request. U.S. citizens and legal permanent residents should submit requests to contest or amend information contained in CIS as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, the proposed amendment, and any evidence of the correct information. The requestor should also clearly mark the envelope, "Privacy Act Amendment Request." The record must be identified in the same manner as described for making a request for access. Persons not covered by the Privacy Act are also able to amend their records. If a person finds 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.



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 through this PIA and the associated SORNs. The USCIS Live Chat agent may also provide individuals with additional guidance for correcting their information.

7.4 Privacy Impact Analysis: Related to Redress

There is no privacy risk with respect to redress. USCIS provides individuals multiple opportunities during and after the completion of the benefit request process to correct information. Customers may also contact Live Agent and report issues for as long as their cases are pending with USCIS.

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?

USCIS 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.

All USCIS employees and contractors are required to complete annual privacy and security awareness training. 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 to safeguard information. In addition, both Tier 1 and Tier 2 personnel receive job-specific privacy training.

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

USCIS must grant an employee or contractor access and issue the employee or contractor a user name and password to gain access to the system. The information systems under the Customer Engagement Center accreditation boundary use role-based access controls so only users with a need-to-know have access. Each supervisor determines need-to-know based on the



individual's job responsibilities. Moreover, the systems that support the CEC provide a warning banner at all access points to deter unauthorized use of information by internal users. The banner warns users about the appropriate uses of the system, that the system may be monitored for improper use and illicit activity, and the penalties for non-compliance.

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 does not share information collected through Live Chat with organizations within or outside of DHS. However, USCIS has a formal review and approval process in place for any new sharing agreements. The proper authorities, including the USCIS Privacy Office, must approve any new use of information or new access requests for the system.

Responsible Officials

Donald K. Hawkins
Privacy Officer
United States Citizenship and Immigration Services
Department of Homeland Security

Approval Signature

Original, signed copy on file with the DHS Privacy Office.

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