



Privacy Impact Assessment
for the
Refugee Access Verification Unit (RAVU)

DHS/USCIS/PIA-049

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Contact Point

**Donald Hawkins, Privacy Officer
United States Citizenship and Immigration Services
Department of Homeland Security
(202) 272-8000**

Reviewing Official

**Jonathan R. Cantor
Acting Chief Privacy Officer
Department of Homeland Security
(202) 343-1717**



Abstract

The Department of Homeland Security U.S. Citizenship and Immigration Services (USCIS) uses the Enterprise Collaboration Network to manage the Refugee Access Verification Unit (RAVU) records. The purpose of RAVU is to track and manage the review of Affidavits of Relationship (AOR) filed by immediate family members (herein referred to as anchor relatives) in the United States on behalf of overseas family members who seek consideration for refugee resettlement under the Priority 3 Family Reunification Program. USCIS is conducting this Privacy Impact Assessment because RAVU collects, uses, and maintains personally identifiable information.

Overview

The Department of Homeland Security (DHS) U.S. Citizenship and Immigration Services (USCIS) and the Department of State (DOS) Bureau of Population, Refugees, and Migration (PRM) work cooperatively to administer the overseas component of the U.S. Refugee Admissions Program (USRAP). The mission of the USRAP is to resettle eligible refugees in the United States. DOS PRM has overall management responsibility for the USRAP and leads in proposing admissions ceilings and defining processing priorities under which individuals may obtain access to the USRAP. The USCIS Refugee, Asylum, and International Operations Directorate (RAIO), Refugee Affairs Division (RAD), Refugee Access Verification Unit (RAVU) is responsible for interviewing refugee applicants and adjudicating applications for refugee status.

The USRAP uses priority categories to determine whether refugees are of special humanitarian concern¹ to the U.S. A refugee must fall under one of the following to qualify for access and consideration through the USRAP:

- **Priority 1** – Individual cases referred to the program by virtue of their circumstances and apparent need for resettlement. United Nations High Commissioner for Refugees, a U.S. Embassy, or a designated non-governmental organization (NGO) may identify and refer cases to the program;
- **Priority 2** – Groups of cases designated by DOS, after consultation with USCIS, as having access to the program by virtue of their circumstances and apparent need for resettlement; and
- **Priority 3** – Individual cases from eligible nationalities granted access for purposes of reunification with anchor family members already in the United States.

Access to the program under one of the above-listed processing priorities does not mean an applicant is admissible to the U.S. or meets the statutory definition of a refugee under section 101(a)(42) of the Immigration and Nationality Act (INA). The ultimate determination as to whether an applicant meets the refugee definition is made by USCIS in accordance with criteria set forth in the INA and various security

¹ See Section 207(a)(3) of the *Immigration and Nationality Act* (INA), which states that the USRAP shall allocate admissions among refugees of, “special humanitarian concern to the United States in accordance with a determination made by the President after appropriate consultation.”



protocols. Applicants who are eligible for access under one of the established priorities are presented to USCIS officers for an interview.²

Two separate IT systems maintain the information necessary to process applications for refugee resettlement under the Priority 3 Family Reunification Program (herein referred to as P-3): 1) The DOS Worldwide Refugee Admissions Processing System (WRAPS)³; and 2) RAVU. WRAPS maintains information related to all individuals referred to the USRAP for resettlement. USCIS has read only access to WRAPS. In addition to the refugee interviews required for all refugee applicants, RAVU also conducts a preliminary paper review of all AORs filed for P-3 cases prior to interview by a USCIS officer overseas. The purpose of this PIA is to describe the RAVU system used to track and manage the review of P-3 cases only.

Priority 3: Family Reunification Program Qualifications

Individuals may be eligible for access to the USRAP under P-3 if certain qualifications are met. The P-3 category of USRAP affords access to members of designated nationalities who have immediate family members (herein referred to as “anchor relatives”) in the United States who entered as refugees or were granted asylum. Parents, spouses, and unmarried children under the age of 21 of a qualifying anchor relative may be eligible for access to the USRAP under P-3. Relationships between the anchor relative and the qualifying family members overseas must have existed at the time of the anchor relative’s admission as a refugee or at the time the anchor relative was granted asylum.

Anchor relatives may file an AOR, Form DS-7656, with DOS on behalf of their qualified family members abroad to initiate their USRAP application for refugee resettlement to the U.S. The AOR must be completed in-person by a domestic resettlement agency, a private non-governmental agency working under a cooperative agreement with DOS to assist refugees and asylees in applying for their prospective family members to join them in the U.S. under P-3. The only purpose of the form is to claim a relationship with overseas family members.

The AOR requires the anchor relative to include information about him or herself and information about relatives in order to assist DOS and USCIS in determining whether a prospective family member is qualified to apply for access to USRAP for family reunification purposes. Anchor relatives must also sign an acknowledgment of understanding that DOS may require the collection of DNA evidence to verify the claimed biological relationships, and it is the anchor relative’s responsibility to pay the associated fees. The domestic resettlement agencies then forward the completed AORs electronically to the DOS Refugee Processing Center (RPC)⁴ for data entry and scanning into WRAPS. Resettlement

² Access to the USRAP under Priority 1 and Priority 2 is through referrals from the United Nations High Commissioner for Refugees (UNHCR), a U.S. Embassy, a designated NGO, or, for designated groups, through an application submitted directly by the applicant to the overseas Resettlement Support Center (RSC). Unlike access granted under Priority 3, USCIS only assesses access under Priority 1 and Priority 2 at the time of USCIS interview overseas.

³ WRAPS is the DOS case management database used for all refugee applicants processed for resettlement consideration to the U.S. Please see the WRAPS PIA and SORN for more information on this system and the information it collects, uses, and maintains. Available at <http://www.state.gov/documents/organization/101146.pdf>.

⁴ RPC, operated by DOS contractors, is the central data repository for all overseas and domestic resettlement operations. The RPC manages the WRAPS database.



Support Centers (RSC), are assigned cases by the RPC and conduct a preliminary AOR screening with the overseas family members after the case is entered into WRAPS. The RSC is an overseas non-governmental agency, international organization, or a U.S. Embassy contractor that has a cooperative agreement with DOS to assist in the processing of refugees for admission to the U.S.

DNA Testing to Validate Biological Relationships

USCIS is not responsible for the collection of DNA; the Department of State and its RSC partners coordinate the collection of DNA and USCIS relies on the testing results from this collection to make its determination. During the initial AOR screening interview, the RSC gathers basic biographical information from the overseas relatives listed in Section II of the AOR and provides notice to the overseas family members of the DNA testing requirements for certain claimed biological relationships as determined by DOS PRM.⁵ The RSC also explains to overseas family members what DNA testing does and how it has the ability to provide additional evidence to prove or disprove claimed biological relationships.

Once the initial AOR screening is completed, the RSC sends a letter to the anchor relative through the domestic resettlement agency advising him or her that DNA testing is required for certain identified relationships claimed on the AOR. This letter also includes the American Association of Blood Banks (AABB) website and detailed instructions for the accredited AABB laboratory responsible for collecting DNA samples from the anchor relative and performing the DNA analysis. An embassy-appointed panel physician, under observation of a U.S. citizen RSC employee, collects DNA samples from the overseas family member. Overseas samples are shipped to the AABB lab by the RSC employee using approved chain of custody procedures established by the laboratory.

The DNA laboratory analyzing the DNA samples is required to send a copy of the results directly to the anchor relative and to the RPC. An RPC staff member redacts the alleles from the DNA results and scans a copy of the redacted results into WRAPS.⁶ The results include whether the biological relationship is confirmed or not confirmed, the report date, and the name of the lab.

USCIS' role begins when the RPC sends a spreadsheet with biographic information from the AOR to USCIS to initiate the review of claimed relationships by RAVU. This spreadsheet is auto-generated by WRAPS and contains information that is already available to the RAVU officer. However, providing a spreadsheet that can be imported into RAVU prevents data entry errors by officers conducting RAVU review. The spreadsheet may contain DNA results (if entered into WRAPS by the RPC) as Y or N based on whether the results meet the 99.5% threshold requirement. RAVU officers also access WRAPS to obtain a scanned copy of the AOR, DNA results, and additional information gathered from the RSC's initial AOR screening interview. RAVU will verify this information against the information provided in the spreadsheet to ensure accuracy.

⁵DNA testing is currently used to verify claimed biological parent-child relationships and may be conducted between the anchor relative and qualifying family member and/or between family members on a refugee case. The RSC determines the relationships that will be tested at pre-screening based on DOS PRM guidance and sends the letter to the anchor relative through the domestic resettlement agency.

⁶ Alleles are used as genetic markers in DNA testing for paternity or maternity.

Determining Eligibility for Priority 3

RAVU's role in P-3 processing is to conduct an initial paper review of the claimed relationships between the anchor relative and overseas family members listed on the AOR. All AORs are subject to a RAVU review and only those family members on AORs who are cleared by USCIS proceed to a refugee interview with a USCIS officer overseas. To support this function, USCIS developed the RAVU database using the existing SharePoint Enterprise Collaboration Network (ECN) to track and manage the review of AORs, as well as generate reports, forms, and letters.⁷ ECN is a virtual work environment that allows users to collaborate, share information, and enhance productivity. RAVU allows users to enter data into a site through manual typing and attaching documents in a virtual space. Data from AORs and corresponding documents from the A-file are uploaded from individual computers to a secured centralized site in ECN.

The RAVU review process has three steps: 1) Case Receipt Process; 2) Case Review and Eligibility Decision; and 3) Case Decision Output. The general procedural steps below outline the process associated with determining eligibility for refugee resettlement consideration through the USRAP under P-3. Each of these steps is designed to ensure a thorough review and the efficient management of the P-3 request. USCIS uses the RAVU database to track and manage the review of AORs.

Case Receipt Process

The RPC provides RAVU with a spreadsheet containing all P-3 cases ready for RAVU review on a weekly basis through a secure DOS file-sharing website maintained by the RPC. This spreadsheet contains biographic information provided by the anchor relative on the AOR for the anchor relative and his or her claimed overseas relatives, including name, date of birth, place of birth, familial relationship, marital status, and information regarding the domestic resettlement agency that filed the AOR for the anchor relative. RPC also assigns a globally unique identifier (GUID), a string of 32 characters, to each case. USCIS imports this spreadsheet into the RAVU database to initiate the case review process to prevent typographical errors.

RAVU officers thoroughly review each AOR and supporting documentation in the anchor relative's A-file to determine if the anchor relative had previously established a familial relationship with the individuals listed in the AOR during his or her USCIS application process. RAVU e-mails a spreadsheet listing all required A-files to the National Records Center (NRC) for scanning.⁸ The NRC scans all necessary documentation from the anchor relative's A-file as identified by RAD as instrumental in assessing the relationships between the anchor relative and beneficiaries listed on the AOR. Examples may include, but are not limited to, prior applications filed by the anchor relative, the anchor relative's refugee or asylum case notes, family trees, refugee pre-screening documents, and copies of identity documents. Documents from the A-file containing derogatory information regarding the anchor relative

⁷ Please refer to the DHS/ALL/PIA-037 DHS SharePoint and Collaboration Sites PIA for a full description of DHS's use and requirements of SharePoint at www.dhs.gov/privacy. RAVU was designed in accordance with DHS/ALL/PIA-037.

⁸ The A-file includes information such as applications and petitions for benefits; vital identity documents (e.g., birth certificates, passports, marriage certificates); biometrics information (e.g., photographs, fingerprints); law enforcement supporting documents (e.g., "rap sheet"); and other documents material to immigration applications (e.g., naturalization certificates, tax returns, labor certification, correspondence, court dispositions, interview notes).



from DHS systems or U.S. government investigations are also scanned by the NRC for review by RAVU. The NRC uploads these documents into a designated site in RAVU only accessible by RAVU officers and supervisors responsible for reviewing RAVU cases.

Case Review and Eligibility Decision

All RAVU officers and supervisors have access to WRAPS. RAVU officers obtain a copy of the AOR from WRAPS and compare the information provided on the AOR with the information available in USCIS records, including the anchor relative's A-file and available systems. RAVU officers conduct background and security checks using DHS, DOS, and other federal databases, as necessary, to verify the claimed relationships between the anchor relative and the overseas family members, identify any benefit applicants who may pose a risk to national security or public safety, and identify derogatory information that may affect eligibility for the benefit sought. RAVU officers may record any information found in these systems and the information provided on the AOR in the comments section of RAVU.

Officers also review the DNA results in WRAPS and record those results in the RAVU database as additional evidence relating to the verification of claimed relationships. All decisions regarding P-3 access made by the officer as a result of this review are recorded in the RAVU database. The RAVU database contains the decision for the case, biographic information regarding the anchor relative and overseas family members, fraud indicators identified by the reviewing officer, and two comment sections containing the refugee officer's findings for the case and the supervisor's comments after reviewing the case. When the spreadsheet from the RPC is imported into the database, RAVU automatically creates a database record for each qualifying family member listed on the AOR.

Case Decision Output

Based on the information collected in the RAVU database, a RAVU Checklist is generated summarizing the results for the USCIS interviewing officer. The RAVU Checklist contains the name, nationality, relationship, and A-number of the anchor relative and the qualifying family member, as well as the names of all claimed overseas relatives included on the AOR. The RAVU Checklist also contains a summary of the RAVU decision, including any inconsistencies identified between the AOR and available immigration records and security checks. The RAVU checklist is a print out of the information from the database. Due to electricity and/or internet connection outages at some interviewing locations, interviewing officers use the checklist to address inconsistencies that have been discovered and any suggested lines of inquiry that should be covered during interview. Once the RAVU Checklist is printed and stamped approved by the supervisory refugee officer, it is put into a sealed envelope and shipped overseas. Only USCIS officers have access to the contents of the sealed envelope.

The RAVU database also generates decision letters that USCIS sends to the domestic resettlement agencies, through the RPC, to provide them with a summary of the RAVU decision. The domestic resettlement agencies distribute these letters to the anchor relatives. The RAVU database also exports spreadsheets containing basic RAVU decision information (approved or rejected) for each individual on an AOR. Electronic copies of these spreadsheets are sent to the RPC through the DOS secure file-sharing website and imported into WRAPS, which updates the RAVU case status. The GUID is used to accurately link the imported RAVU decision results to the correct individual in WRAPS.



Based on the RAVU case status in WRAPS, the RSC will pre-screen⁹ those individuals who have been cleared for processing and present these individuals to USCIS for final interview. Inconsistent information found during the RAVU review may lead to a denial of refugee status at USCIS interview. Interviewing officers note their final decisions on the Refugee Application Assessment, which is included in the refugee case file that becomes the individual's A-file. The RSC will close any cases in WRAPS that have been rejected by RAVU.

The RAVU Checklist, as well as a copy of the AOR filed by the anchor relative, is included in the refugee case file¹⁰ for review by the USCIS officer conducting the refugee interview. The contents of the refugee case file become the individual's A-file once an applicant for refugee status has entered the U.S. at a Port of Entry or a final decision to deny refugee status has been made. A-files are not created for individuals who are not granted access to an overseas refugee interview by RAVU. USCIS also interfiles copies of the AOR, RAVU Checklist, and RAVU decision letter with the anchor relative's A-file once the RAVU review is complete.

Cases Suspected of Fraud

DOS and USCIS jointly halted most P-3 processing in 2008 based on widespread fraud revealed by a DNA pilot conducted by DOS in East and West Africa.¹¹ To combat this issue, DOS incorporated a new requirement in the P-3 process for DNA testing of certain claimed biological relationships between the anchor relative and overseas qualifying family members. Inconsistencies between claimed relationships on the AOR and information available in USCIS records are documented in the RAVU database. Fraud discovered during RAVU review is recorded on the RAVU Checklist and included in the anchor relative's A-file. Evidence of past immigration fraud could have an adverse effect on future immigration benefits sought by the individual, including applications for adjustment of status or naturalization. Significant fraud, including fraud related to an anchor relative's original refugee or asylum case or potential alien smuggling, may be reported to the Fraud Detection and National Security Directorate (FDNS) for possible investigation and termination of immigrant status.¹² If it is determined that a genuine relationship does not exist between the anchor relative and a claimed overseas family member, the processing of his or her overseas family member's P-3 refugee case will be terminated.

The primary privacy risk identified with RAVU is that USCIS relies on multiple sources to verify a claimed relationship between the anchor relative and the claimed overseas relative. There is a possibility of inconsistent or missing information. To mitigate this risk, USCIS provides the individual with an opportunity to correct any missing or inconsistent information. When information necessary for making a determination is missing, the AOR is rejected as incomplete and a RAVU decision letter is sent to the anchor relative through the domestic resettlement agency notifying him or her of the missing information. The anchor relative will have 90 days from the date from which this letter is sent to submit an updated

⁹ During pre-screening RSCs collect the initial refugee claim, fill out the I-590 application form, and create a family tree for all refugee applicants.

¹⁰ The refugee case file is a hard copy of the documents related to the refugee resettlement case. This later becomes the A-file as described below.

¹¹ Please see the Fraud in the Refugee Family Reunification (Priority Three) Program Fact Sheet for more information, available at <http://www.state.gov/j/prm/releases/factsheets/2009/181066.htm>.

¹² Please see the USCIS/FDNS/PIA-044 for more information on the fraud referral process at http://www.dhs.gov/sites/default/files/publications/privacy/privacy_pia_uscis_frauddetection_07302012.pdf.



AOR with the missing information. If RAVU determines that the anchor relative is unlikely to be able to provide additional information to support the claimed relationship and no inconsistent information has been found during the RAVU review, it will forward the AOR overseas for interview. The USCIS interviewing officer will be responsible for making the final determination of whether or not the claimed relationship is genuine. In addition, all of the information RAVU reviews has been provided by the anchor relative and often verified by a USCIS officer during the anchor's refugee interview, including information from the A-file and information submitted by the anchor in the AOR. RAVU considers the significance of any inconsistencies found when making a determination regarding access. Resettlement agencies have also been trained by DOS PRM and USCIS to provide counseling to the anchor relatives and solicit explanations regarding any known inconsistencies.

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), 8 U.S.C. §§ 1157 and 1522(b), as amended, provides the legal authority to collect and use information for the Priority 3 Family Reunification Program.

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

The STATE-59¹³ Refugee Case Records SORN covers the collection of information from individuals who have applied for admission to the U.S. under the USRAP and individuals in the United States who claim a relationship with certain family members overseas in order to establish their access to the USRAP. Routine Use 1 of STATE-59 Refugee Case Records permits DOS to share information with USCIS to determine the eligibility and admissibility of individuals applying for admission to the U.S. as refugees or any other immigration benefit under U.S. law.

Concurrent with the publishing of this PIA, DHS is updating and reissuing DHS/USCIS-008 Refugee Access Verification Unit System of Records Notice to clarify that the SORN covers the review of AORs filed by anchor relatives in the U.S. on behalf of certain family members overseas seeking consideration for refugee resettlement under P-3.¹⁴ The DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records (June 13, 2011, 76 FR 34233) also covers the materials from the refugee case file, which are consolidated into the A-file after the individual is admitted to the U.S. at a Port of Entry or a final decision to deny refugee status has been made.¹⁵ A-files are created for individuals who are interviewed by a USCIS officer overseas.

¹³STATE-59 Refugee Case Records SORN is available at <http://www.state.gov/documents/organization/102801.pdf>

¹⁴ DHS/USCIS-008 Refugee Access Verification Unit SORN is available at <http://www.gpo.gov/fdsys/pkg/FR-2008-12-19/html/E8-29837.htm>.

¹⁵ The DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records SORN is available at <http://www.gpo.gov/fdsys/pkg/FR-2011-06-13/html/2011-14489.htm>.



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

RAVU is covered as a subsystem under the DHS SharePoint as a Service (SPaaS) Authority to Operate (ATO). The ATO for SPaaS was issued on August 5, 2011, and is set to expire after three years.

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

NARA approved the RAVU Records [N1-563-04-05] and A-file [N1-566-08-11] Retention Schedule. USCIS is working with NARA to supersede/revise the RAVU Retention Schedule to reflect a 15-year retention of the Master File instead of the current 20 years.

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.

RAVU does not collect information directly from the individual. DOS uses Form DS-7656, Affidavit of Relationship, to establish qualifications for access under P-3, which is subject to PRA requirements. DOS obtained OMB approval for Form DS-7656 (OMB No. 1405-0208).

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.

RAVU maintains information about anchor relatives located within the United States and claimed qualifying family members overseas who are listed in Section II of the AOR.

Information about the anchor relative gathered from scanned documents in the A-file may include:

- Full Name;
- Physical and Mailing Address;
- Telephone and Fax Numbers;
- Date of Birth;
- Gender;
- A-Number;
- Social Security number;
- Immigration Status;
- Date of Arrival in the U.S.;



- Date Asylum/Refugee status was granted;
- Mother's Maiden Name;
- Documents establishing identity and claimed relationship (i.e., marriage record, civil or criminal history, medical records, education records);
- Biometric identifiers (i.e., weight, color of eyes and hair, and facial marks);
- Photographic Facial Image;
- Civil or criminal history information;
- Reports of investigations or derogatory information obtained from DHS and other federal systems;
- Refugee and asylum interview notes and assessments; and
- Other unique identifiers, including information found in the A-File used to facilitate a determination.

Information about the anchor relative collected in the AOR and through the RAVU review may include:

- Full Name;
- Date of Birth;
- Gender;
- City/Country of Birth;
- A-Number;
- Immigration Status;
- Date of Arrival in the U.S.;
- Date Asylum/Refugee status was granted;
- Names, dates of birth, and locations of immediate relatives; and
- DNA Results – confirmed or not confirmed.

Information about overseas family members may include:

- Full Name;
- Gender;
- Date of Birth;
- City of Birth;



- Country of Birth;
- Nationality;
- Marital Status;
- A-Number (if applicable);
- Relationship to Anchor Relative;
- DNA Results – confirmed or not confirmed;
- Photographic facial image;
- Civil or criminal history information (if available); and
- Reports of investigations or derogatory information obtained from DHS or other federal systems (if available).

RAVU findings, including inconsistencies between claimed relationships in the AOR and available USCIS records, are recorded on RAVU Checklists and RAVU decision letters. RAVU generates reports to track USCIS officer and supervisor productivity, fraud trends, and case workload for use within RAD.¹⁶ The database will also generate one page reports containing workload and overall fraud trends within particular domestic resettlement agencies, which may be shared with those agencies and DOS PRM. Information gathered from available DHS, DOS, or other federal systems may also be recorded in the RAVU database.

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

RAVU does not collect information directly from the individual. The anchor relative supplies the biographical information on the AOR, which they provide to the domestic resettlement agency responsible for completing the AOR and submitting the form to DOS. USCIS collects information from DOS (including DNA results), the anchor relative's A-file, and DHS and other federal systems to determine whether the anchor relative's claimed overseas relatives are eligible for access to P-3. USCIS officers will conduct interviews with the anchor relative's qualified overseas relatives to determine their eligibility for admission to the United States as a refugee.

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

USCIS does not collect information from commercial or publicly available data sources to verify the relationship between the anchor relative and claimed overseas relatives listed on the AOR.

¹⁶ Please see the Employee Production Reporting Tool PIA for more information, available at www.dhs.gov/privacy.



2.4 Discuss how accuracy of the data is ensured.

RAVU will compare information provided by the anchor relative in the AOR with information available to USCIS in the anchor relative's A-file, DNA results provided to USCIS by DOS, and DOS and other federal systems. AABB accredited laboratory testing procedures will be followed for the collection and processing of any DNA collected by DOS for the purposes of verifying the relationships between the anchor relative and his or her claimed overseas relatives. RAVU will also compare information provided by the anchor relative in the AOR with information provided by the claimed overseas relatives during RSC pre-screening to determine eligibility. If the refugee applicants are granted access under P-3 and interviewed by USCIS, any inconsistencies found during the RAVU review will be discussed with the claimed overseas relatives during the refugee interview.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that RAVU will collect more information than is necessary to perform USCIS' mission.

Mitigation: RAVU has been carefully designed to collect and store only the information that is necessary for the officers to make required P-3 refugee access determinations. The information collected and stored on the RAVU ECN site is required to establish the identity of the anchor relative and claimed overseas relatives and is used to determine whether claimed overseas relatives are eligible for access under P-3. The NRC has been trained on which documents from the A-files are necessary to review in order to verify relationships between the anchor relatives and their claimed overseas relatives. Only these documents are scanned and uploaded to the RAVU ECN site.

Privacy Risk: There is a risk that inaccurate information will be used to determine claimed relationships.

Mitigation: RAVU relies on several different systems (i.e., WRAPS, RAVU, A-File) to verify a claimed relationship between the anchor and claimed overseas relationship. All of the information RAVU reviews has been provided by the anchor relative and often verified by a USCIS officer during the anchor's refugee interview, including information from the A-file and information submitted by the anchor in the AOR. RAVU takes into consideration the significance of any inconsistencies found when making a determination regarding access. Domestic resettlement agencies are also trained by DOS PRM and USCIS to provide counseling to the anchor relatives and solicit explanations regarding any known inconsistencies.

Privacy Risk: There is a risk that copies of paper A-Files are scanned and uploaded in the RAVU database, thus creating duplicate records.

Mitigation: Scanned copies of the A-file will only be used for RAVU determinations and will not be reviewed for adjudications by any other component of USCIS. Scanned copies of the A-file uploaded into the RAVU database will be deleted when no longer needed for agency business.



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 uses the RAVU database to track and manage the review of AORs filed by anchor relatives in the U.S. on behalf of certain overseas family members seeking consideration for refugee resettlement under P-3. USCIS compares the information contained in the AOR with the information contained in the anchor relative's A-file and other USCIS records to determine eligibility for access to the USRAP. DNA results collected by DOS are also used to verify some claimed family relationships.

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.

RAVU does not use technology to discover or locate a predictive pattern or anomaly for P-3 case reviews. The RAVU database generates statistical reports to determine productivity of RAD officers and supervisors. Reports are also generated to identify fraud trends among P-3 anchor relatives and claimed overseas relatives and are also used to track final decisions. Fraud trends collected by RAVU may be used by USCIS and DOS PRM to assess the validity of the P-3 program.

3.3 Are there other components with assigned roles and responsibilities within the system?

No. Access to RAVU is limited to USCIS employees with a valid need to know. Suspected fraud cases may be shared with USCIS FDNS.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that collected information may be used for a purpose incompatible with the original purpose of collection.

Mitigation: Auditing functions track any changes made by users in the RAVU database. The importance of confidentiality, particularly for refugee cases, is covered during Refugee Division Officer Training Course (RDOTC), which is mandatory for all refugee officers and supervisory refugee officers. All USCIS employees receive mandatory Computer Security Awareness Training and Privacy Act training, which identify how to safeguard Personally Identifiable Information and For Official Use Only documentation. These trainings also identify the criminal and civil penalties associated with the unauthorized disclosure of this information.

Privacy Risk: There is a risk that incomplete information could be used to make an adverse determination regarding the claimed relationship between the anchor relative and the overseas family member.



Mitigation: Information gathered during the RAVU process is used to determine whether legitimate relationships exist between the anchor relative living in the United States and claimed overseas relatives listed on the AOR. If RAVU finds significant inconsistencies between information provided by the anchor relative on the AOR and available immigration records, RAVU will reject the overseas family member's access to the USRAP under Priority 3. RAVU may also refer AORs with significant fraud to FDNS for possible investigation, which could lead to termination of the anchor relative's immigration status. RAVU records its findings on the RAVU Checklist, which is included in the anchor relative's A-file. If insufficient information is available to make a determination and no significant inconsistencies are found during the RAVU review, RAVU will forward the AOR overseas for a refugee interview. The USCIS interviewing officer makes the final determination of whether the claimed relationship is genuine. Fraud identified in RAVU findings may impact future immigration benefit applications.

Privacy Risk: There is a risk that the collection of DNA results is used beyond verifying claimed relationships.

Mitigation: Due to an absence of documentary evidence establishing biological relationships and a high rate of fraud within claimed biological relationships within the P-3 Program, DOS is requiring DNA testing to confirm some biological relationships for individuals applying for access under P-3. DNA testing occurs between the anchor relative and the anchor relative's biological parents and children listed in Section II of the AOR to confirm access under P-3. DNA analysis will only be conducted by AABB accredited laboratories in the United States. DNA results scanned into WRAPS by the RPC will have all alleles redacted. Applicants that are denied by USCIS due to lack of credibility regarding claimed family relationships may also provide DNA evidence between family members on the case at their own expense to support a Request for Review (RFR).

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 individuals general notice through this PIA and associated RAVU and A-file SORNs. Additionally, individuals who file an AOR for claimed overseas relatives seeking to gain access under P-3 are presented with a Privacy Act Statement by DOS, as required by Section (e)(3) of the Privacy Act, and sign a release authorization on the DOS AOR form. The Privacy Act Statement details the authority to collect the requested information and outlines the intended uses. The form also contains a provision by which an applicant authorizes DOS to release any information received from the anchor relative to USCIS as needed to determine whether claimed overseas relatives are eligible for access under P-3.

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



The AOR form requires the anchor relative to provide biographic information regarding the anchor relative and his or her parents, spouses, children, siblings, and any claimed overseas relatives for whom the anchor relative is seeking access under P-3. Photographs of overseas family members for whom the anchor relative is applying are also required on the AOR. This information is critical in making an informed decision to grant or deny access under P-3. Anchor relatives who file the AOR have an opportunity and the right to decline to provide information. However, the failure to submit such information precludes USCIS from processing the request for access under P-3. By filing the AOR, individuals have consented to the use of the information provided on the AOR by USCIS to determine whether their claimed overseas relatives have access under P-3.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: Due to the original collection by DOS, there is a risk that individuals may be unaware that their information is collected by USCIS.

Mitigation: DOS provides notice to individuals seeking access to the USRAP for refugee resettlement consideration through the AOR prior to the collection of information. In addition, the AOR form contains a provision by which an anchor relative authorizes DOS to release any information provided on the AOR to USCIS as needed to determine eligibility for access under P-3. Anchor relatives are also advised through the STATE-59 Refugee Case Records SORN that the information provided may be shared with Members of Congress and other Federal, State, and local government agencies having statutory or other lawful authority. The USCIS RAVU and A-file SORNs also provide additional notice to individuals by specifying the routine uses of the system.

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 receives biographical information from the AOR and DNA results (as Yes or No) from DOS, which are stored in the RAVU database. The anchor relative's A-file will retain copies of the RAVU Checklist (with the RAVU decision), the AOR, and the RAVU decision letter. Additionally, the RSC retains copies of the AOR and RAVU Checklist in the claimed overseas relative's case file, which later becomes his or her A-file if USCIS interviews the individual. RAD retains RAVU electronic records for a period of 15 years. The A-file records are permanent whether hard copy or electronic. DHS transfers the A-files to the custody of the National Archives 100 years after the individual's date of birth.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information will be retained longer than necessary to accomplish the USCIS mission need.

Mitigation: The RAVU and A-file data retention periods identified in the approved NARA schedule are consistent with the concept of retaining data only for as long as necessary to support the agency's mission. The schedule complies with the requirements of the Federal Records Act and the



stated purpose and mission of the systems. The time periods in the NARA schedule were carefully negotiated between USCIS and NARA to ensure that data is retained for the minimum time needed to process the AOR and make the information available for other AORs filed by the anchor relative.

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.

DOS and USCIS share information as part of normal agency operations for processing refugee cases. The Privacy Act Statement on the AOR informs the anchor relative that information provided in the AOR to DOS may be shared with DHS. Information sharing with DOS regarding RAVU decisions includes notification of approval or denial of access under P-3 for individual overseas family members of the anchor relative, as well as general fraud trends. The decision to approve or deny access by RAVU is maintained in WRAPS, and the RSC accesses this decision information to prepare the refugee cases for USCIS refugee interview.

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

The responsibility for processing of refugee cases is held jointly by DOS and USCIS. Routine Use 1 of STATE-59, Refugee Case Records, permits DOS to share information with USCIS to determine the eligibility and admissibility of individuals applying for admission to the U.S. as refugees or any other immigration benefit under U.S. law. Routine Use H of DHS/USCIS-008 RAVU SORN permits USCIS to share information with DOS when necessary to accomplish an agency function related to this system of records.

6.3 Does the project place limitations on re-dissemination?

USCIS and DOS are partners in the processing of refugee cases. It is inherent that information be shared between the two agencies for refugee resettlement. USCIS provides DOS with basic RAVU decision information (approved, rejected) for each claimed overseas relative listed in Section II of the AOR. Information related to asylum cases is protected under 8 CFR § 208.6. This protection is also provided to refugees as a matter of policy.

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

A log of all information is maintained by RAVU. A record is kept on file of each disclosure, including the date the disclosure was made, the purpose of the disclosure, and a description of the data provided.



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

Privacy Risk: There is a risk of misuse, unauthorized access to, or disclosure of information.

Mitigation: Sharing of information between DOS and USCIS is required to process refugee resettlement cases. Information is only shared through secure sites and access to those sites is restricted to those with a need to know. All personnel within DOS and USCIS are trained on the appropriate use and safeguarding of data. In addition, DOS and USCIS have policies and procedures in place to ensure there is no unauthorized dissemination of this information. Any disclosure must be compatible with the purpose for which the information was originally collected, confidentiality provisions of 8 C.F.R § 208.6, and only authorized users with a need to know may have access to the information contained in RAVU.

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 Privacy Act of 1974, 5 U.S.C. § 552a, as amended, provides statutory privacy rights to U.S. citizens and Legal Permanent Residents (LPR). The Privacy Act does not cover visitors or aliens. As a matter of DHS policy, any PII that is collected, used, maintained, and/or disseminated in connection with a mixed system by DHS is to be treated as a System of Records subject to the Privacy Act regardless of whether the information pertains to a U.S. citizen, Legal Permanent Resident, visitor, or alien. Under this policy, DHS components are to handle non-U.S. person PII held in mixed systems in accordance with the fair information practice principles, as set forth in the Privacy Act. Non-U.S. persons have the right of access to their PII and the right to amend their records, absent an exemption under the Privacy Act; however, this policy does not extend or create a right of judicial review for non-U.S. persons.

Any individual seeking access to his or her USCIS record may submit a Freedom of Information Act (FOIA) or Privacy Act request to the following address:

USCIS National Records Center

Freedom of Information Act/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 or FOIA applicable exemptions. Requests for access to RAVU records will be reviewed on a case-by-case basis. Further information about 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?

Anchor relatives may provide updated or corrected information on the AOR to the domestic resettlement agency. The domestic resettlement agency provides this information to the RPC and the updates will be reviewed by RAVU officers. In addition, claimed overseas relatives will be interviewed several times by the RSC to collect accurate information regarding family relationships. The USCIS interviewing officer will also interview claimed overseas relatives and provide them with the opportunity to explain any inconsistent information found in the RAVU review if RAVU grants access to a refugee interview.

USCIS treats all requests for amendment of information in a system of records as Privacy Act amendment requests. Individuals may direct all requests to contest or amend information to the FOIA/PA Office at USCIS at the address listed above. They must state clearly and concisely in the redress request the information being contested, the reason for contesting it, and the proposed amendment thereof. However, there is no appeals process for P-3 determinations. The individual cannot file a motion to reopen or reconsider and cannot appeal the decision if USCIS denies his or her request for access under P-3.

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

The DHS/USCIS-008 RAVU and DHS/USCIS-001 A-file SORNs provide individuals with notice and guidance regarding the procedures for correcting information. This PIA also provides similar notice. The form instructions notify individuals about the procedures for correcting their information. Anchor relatives are also informed by the resettlement agencies that they should inform the resettlement agency if any changes are necessary. DOS provides guidance to the resettlement agencies.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not have access to their information due to Privacy Act or FOIA exemptions, which may limit avenues for seeking redress.

Mitigation: The redress and access measures offered by USCIS are appropriate given the purpose of the system. Individuals are given numerous opportunities during and after the completion of the application process to correct information they have provided and to respond to information received from other sources. The information requested may, however, be exempt from disclosure under the Privacy Act or FOIA, such as law enforcement sensitive information when the release of such information could possibly compromise ongoing criminal investigations or pre-decisional data.



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?

ECN provides standard functionality to restrict access to sites based on membership in groups. Groups are defined per site and may have different combinations of access permissions, for example read-only, contribute, or full ownership. Individuals who are not a member of one of the defined groups have no access to the site. Using this mechanism, RAD will restrict access to the RAVU documents site to only those persons participating in the transfer of documents and officers and supervisors conducting the RAVU review. Manual audits may be conducted at any time. Server access and unauthorized attempts are logged. 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. RAVU provides auditing capabilities that tracks any changes or additions made by users. RAVU administrators will have access to audit logs and can review them for unauthorized use.

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.

USCIS employees and contractors are required to complete the annual Computer Security Awareness Training and Privacy Awareness Training, which identifies how to safeguard documentation, as well as identify the criminal and civil penalties associated with the unauthorized disclosure of this information. In addition, RAD requires that all RAVU database users receive training in the use of RAVU prior to being approved for access to the RAVU ECN site. All training addresses the use of the system and appropriate privacy concerns including Privacy Act obligations (e.g., SORNs, Privacy Act Statements).

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

Access to the information is determined through specified role-based permissions with a need to know the information as authorized by the Site Administrator. Specifically, access to the RAVU database site is restricted to RAD officers, supervisors, and HQ staff who are working with RAVU. Access to the shared scanned documents site is also provided to NRC staff members who are uploading scanned RAVU documents from the A-files. These role-based access controls are based upon the principle of least privilege. A facilitator may add permissions to NRC staff and refugee officers for specific tasks, and may allow those individuals to view the documents included, but not modify or delete the contents. When doing so, any access rights to the document must be specifically assigned to an individual user who receives the action.



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?

Access to RAVU is restricted to USCIS RAD and NRC users with a need to know. USCIS has a formal review and approval process in place for new sharing agreements. Any new sharing agreements, use of information, and/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
United States Citizenship and Immigration Services

Approval Signature

Original signed and on file with the DHS Privacy Office.

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