



Privacy Impact Assessment
for the

Standard Lightweight Operational Programming Environment – Rules-Based Tools Prototype

DHS/USCIS/PIA-037

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Abstract

The Department of Homeland Security (DHS) United States Citizenship and Immigration Service (USCIS) Office of Information Technology (OIT) developed the Standard Lightweight Operational Programming Environment – Rules-Based Tools Prototype (SLOPE-RBTP) to streamline the adjudication of Form I-90, Application to Replace Permanent Resident Card. SLOPE-RBTP electronically organizes and automates the adjudication of pending Form I-90 applications. USCIS is conducting this Privacy Impact Assessment (PIA) because SLOPE-RBTP collects and uses personally identifiable information (PII).

Overview

The DHS USCIS tracks and stores data related to administering and processing applications for all immigrant and non-immigrant benefits. The USCIS OIT developed the SLOPE-RBTP to electronically organize and automate the processing of the Application to Replace Permanent Resident Card (hereafter, “Form I-90”). SLOPE-RBTP supports the missions of DHS and USCIS by continuing to provide customer service to individuals requesting immigration benefits through the automation of the Form I-90 application process. USCIS has the authority to collect Form I-90 information under the 8 U.S.C. § 1101 *et seq.*, Immigration and Nationality Act of 1952.

Permanent Resident Card

Individuals currently residing in the United States who are eligible for permanent residence - commonly referred to as a green card - submit an application by filing a petition to request an adjustment of status. If an individual lives abroad, he/she may submit an application at a U.S. Department of State consulate for an immigration visa to receive permanent residence status upon admittance to the United States. Once an individual is granted permanent residence he/she is identified as a Lawful Permanent Resident (LPR) and is issued a green card as official documentation.

The green card provides LPRs with access to many benefits such as authorization to live and work in the United States and is accepted as an approved form of supporting documentation when applying for a Social Security card and/or a driver’s license. In addition to the benefits, there are responsibilities and requirements associated with the issuance of a green card. Green cards expire every ten years and it is the responsibility of the LPR to submit an application for renewal card in a timely manner to ensure the documentation remains valid. Also, a LPR is required to replace a green card in other circumstances such as if the current card contains inaccurate information or if it is lost or stolen. When a green card is approaching its expiration date or contains inaccurate information, the LPR will submit a Form I-90 application to USCIS. The Form I-90 application provides the information necessary for USCIS to approve or deny the request for a renewal or replacement card.



Current Review and Adjudication Process

Currently, the Form I-90 application process is completely manual. The Nebraska Service Center (NSC) receives the applications and assigns an adjudicator to complete the review. The adjudicator manually enters the application data into the USCIS data repository for processing immigration benefits, known as the Computer Link Application Information Management System (hereafter, "CLAIMS 3").¹ After entering the data into CLAIMS 3, the adjudicator must access multiple USCIS systems to locate system specific data to verify the eligibility of the applicant and information provided on the application. The adjudicator manually updates CLAIMS 3 with the results (i.e., whether the information is accurate or inaccurate) from each of the USCIS systems. All of the information from the application and the USCIS systems are then reviewed to complete the adjudication process. Once the adjudication is complete a final determination of the application is manually recorded in CLAIMS 3.

The manual process is time-consuming and limits the amount of applications an adjudicator can complete on a daily basis. Also, the manual process creates the possibility of inaccurate data entry into CLAIMS 3. This can result in the denial of an eligible applicant or the approval of an applicant without eligibility and greatly impact the issuance of immigration benefits throughout USCIS.

SLOPE-RBTP

With the introduction of the SLOPE-RBTP pilot, USCIS is conducting a parallel review process of Form I-90 applications. This parallel process maintains the current manual process at the NSC while using SLOPE-RBTP to demonstrate the benefits of automating the adjudication of Form I-90 applications. SLOPE-RBTP will automate the business process and rules required to adjudicate Form I-90 applications through the use of system qualified adjudication. System-qualified adjudication allows SLOPE-RBTP to completely adjudicate Form I-90 applications automatically; eliminating the amount of time an adjudicator spends on manually entering, reviewing, and verifying applicant information.

The purpose of the SLOPE-RBTP pilot is to reduce both the entry of inaccurate information and the Form I-90 backlog. Automatically uploading the application information will eliminate the possibility of discrepancies with the information in each system. Also, SLOPE-RBTP will reduce the Form I-90 backlog because the automated process will not require the adjudicator to spend a significant amount of time on each application. Overall, the SLOPE-RBTP pilot will facilitate an efficient and timely review of Form I-90 applications and demonstrate how automating the process will enhance the approval of benefits at USCIS.

The expected benefits of a successful SLOPE-RBTP pilot project are improvement in information quality and assurance resulting from fewer inaccuracies due to manual entry of data and increased overall efficiency in the benefits processing of the Form I-90.

¹ Please see the USCIS Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) PIA for additional information regarding the administration and adjudication of immigration and naturalization applications at www.dhs.gov/privacy.



SLOPE-RBTP Review and Adjudication Process

The SLOPE_RBTP review and adjudication of Form I-90 applications include the following three steps: 1) application entry process, 2) verification process, and the 3) adjudication decision service. The steps are described in detail below.

1. Application Entry Process

The application process begins when an applicant files a Form I-90 and pays the applicable fees to USCIS. After receiving the paper application, USCIS data entry personnel will manually enter the data into CLAIMS 3. Next, the application information from CLAIMS 3 is automatically uploaded into the Citizenship and Immigrations Services Centralized Operating Repository (CISCOR) which replicates and consolidates data from five USCIS CLAIMS 3 systems. Upon completion of processing, the application is identified as a pending code status in CLAIMS 3. SLOPE-RBTP extracts and electronically transfers relevant application data to begin the verification process when an application receives a pending code status in CLAIMS 3. For a full list of information moved into SLOPE-RBTP see Appendix A.

2. Verification Process

SLOPE-RBTP verifies if the applicant is eligible for a replacement card against two USCIS systems: Central Index System (CIS) and Fingerprint Tracking System Mainframe (FD-258 MF); and one U.S. Customs and Border Protection (CBP) system, TECS.²

SLOPE-RBTP concurrently searches the systems above to verify Form I-90 application information:

- SLOPE-RBTP completes an alien number (A-Number) search in CIS to retrieve additional records such as the applicant's receipt number, A-Number, full name (first, middle, and last names), alias name(s), street, city, state, zip, date of birth, naturalization date and location, mother's first name and father's first name to determine if the information coming from CISCOR accurately matches the information on file in CIS.
- SLOPE-RBTP searches FD-258 MF to retrieve the Federal Bureau of Investigations (FBI) processed date and to determine if fingerprint data and criminal history records are on file for the applicant.
- SLOPE-RBTP completes a name check search in CBP TECS to determine if the applicant's name or aliases return a "hit" or "no hit" for records of known and suspected terrorists, sex offenders, people who are public safety risks, and individuals who are possibly of interest to the law enforcement community.

If the searches above do not provide the collection of biometric information SLOPE-RBTP will access the Scheduling and Notification of Applicants for Processing (SNAP)³ system to determine if there

² Please see the CIS (DHS/USCIS/PIA-009), Immigration Benefits Background Check Systems (DHS/USCIS/PIA-033), and TECS (DHS/CBP/PIA-009) PIAs for additional information on the searches described above at www.dhs.gov/privacy.

³ Please see the SNAP (DHS/USCIS/PIA-020) PIA for additional information about the USCIS automated scheduling process for immigration benefits at www.dhs.gov/privacy.



is an appointment scheduled for biometric collection. In a parallel process, SNAP will receive information from CLAIMS 3 and will notify the applicants to appear at the Applications Support Center (ASC) for their appointment. SLOPE-RBTP will continue to check SNAP to until it locates appointment information for the applicant.

Adjudication Decision Service

After the verification process is complete, SLOPE-RBTP conducts several internal tests using the predefined requirement adjudication business rules to determine benefit eligibility. SLOPE-RBTP then applies the predefined adjudication rules against the information collected to identify clear, approvable filings and presents the system qualified adjudication results for the NSC adjudicator to review.

During this process, the adjudicator will pull cases from the SLOPE-RBTP queue to complete the review of the application. Cases are distributed to adjudicators based on SLOPE-RBTP search results and the level of review necessary to provide a final determination. If an additional review is required, the adjudicator will have access to the inaccurate or incomplete information in the application. This is solely based on the application information and the results from the verification process.

SLOPE-RBTP identifies cases on three levels: a clear case queue, non-clear paper case, or non-clear virtual. Clear cases are system-qualified adjudication cases that are ready for approval or benefits without any additional information or review. An immediate favorable determination is presented to the adjudicator for approval prior to being uploaded into CLAIMS 3 by SLOPE-RBTP. Non-clear paper cases, such as cases that require the physical A-File, require the adjudicator to manually work through the application issues. In addition, the adjudicator will manually update SLOPE-RBTP on the progress and the final determination of the application in CLAIMS 3. Non-clear virtual cases require additional verification of information and require the adjudicator to electronically access CISCOR, CIS, CBP TECS, or FD-258MF. The adjudicator will determine which systems to access based on the inaccuracies returned from the verification process. The adjudicator will update SLOPE-RBTP and CLAIMS 3 of the progress and final determination of the application.

Reporting

SLOPE-RBTP has reporting capabilities to manage the workload and performance of the system.. USCIS employees can utilize the SLOPE-RBTP reporting function to produce reports for specific case actions. The reports are used by supervisors and management personnel to monitor the progress and adjudication of Form I-90 applications. The type of data produced is summary data on the performance of the system. Example reports include cycle-time reports and CBP TECS hit notifications.

USCIS plans to expand the scope of SLOPE-RBTP to include the automated processing of other USCIS benefit applications and petitions. USCIS will update this PIA to document system enhancements and the development of additional modules as SLOPE-RBTP matures to address associated privacy risks and mitigation.



Section 1.0 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 as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

SLOPE-RBTP collects, uses, maintains, and disseminates the following Form I-90 applicant information to facilitate the adjudication of the application and to determine the applicant's eligibility to receive a permanent resident replacement card: receipt number, receipt date, naturalization date, A-Number, Social Security number (SSN), full name, alias names, address, date of birth, mother's first name, father's first name, FBI search result, FBI processed date, criminal history, CBP TECS results ("hit" or "no hit") and search date.

SLOPE-RBTP collects additional data elements during the review and adjudication of the Form I-90 application. See Appendix A for a complete list of this information.

1.2 What are the sources of the information in the system?

SLOPE-RBTP does not collect information directly from the individual. SLOPE-RBTP receives information from the following source systems: CISCOR, CIS, FD-258 MF, SNAP, and CBP TECS.⁴

SLOPE-RBTP receives the applicant information and the final adjudication of the Form I-90 from CLAIMS 3 and CISCOR. CIS provides the applicant's receipt number, A-Number, SSN, full name, alias names, address, date of birth, naturalization date, mother's first name and father's first name to identify possible inaccuracies with the applicant information. CBP TECS completes a search of the applicant's name and/or aliases to determine if there is a match and sends the search results to SLOPE-RBTP. FD -258 MF uses fingerprint data to determine if there is a criminal record on file for the applicant. SNAP provides SLOPE-RBTP with the receipt number, A-Number, and the appointment date for the required biometric collection.

1.3 Why is the information being collected, used, disseminated, or maintained?

SLOPE-RBTP collects, uses, disseminates, and maintains information to adjudicate Form I-90 applications for lost or stolen cards.

⁴ Please see the CIS (DHS/USCIS/PIA-009), SNAP (DHS/USCIS/PIA-020), and TECS (DHS/CBP/PIA-009) PIAs for details about opportunities individuals have to correct their personal information during the immigration and naturalization process at www.dhs.gov/privacy.



1.4 How is the information collected?

SLOPE-RBTP collects information through CISCOR, an electronic interface or via the Person Centric Query System (PCQS)⁵, a read-only electronic interface that connects to the source systems identified in section 1.2.

1.5 How will the information be checked for accuracy?

The accuracy of the information in SLOPE-RBTP is dependent on the accuracy of the data in the source systems. Prior to applying the predetermined requirements adjudication rules, SLOPE-RBTP re-extracts CISCOR data to capture any data changes to ensure that the most accurate and up-to-date information is used to determine benefit eligibility. If inconsistencies exist with information previously obtained from source systems, the adjudicator conducts an additional review to evaluate the accuracy of the information.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

USCIS is authorized to collect and store information in SLOPE-RBTP and its source systems under 8 U.S.C. § 1101 *et seq.*, Immigration and Nationality Act.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Privacy Risk: Unauthorized users may gain access to PII.

Mitigation: All records are protected from unauthorized access through appropriate administrative, physical, and technical safeguards such as restricting access to authorized personnel who have a need-to-know. SLOPE-RBTP is a web-based application that is only available through the DHS network. Access to SLOPE-RBTP is given only to a limited number of users. SLOPE-RBTP users must have access to the USCIS network and have DHS USCIS Active Directory credentials to gain access to the system. USCIS also deploys user logs to ensure authorized users are only accessing information related to their job functions.

Privacy Risk: There is a risk this system may collect more information than is necessary to perform the system's necessary functions thus violating the Privacy Act's data minimization requirements.

Mitigation: USCIS mitigates this risk by only capturing the minimum amount of PII needed to issue a permanent resident replacement card. The risks are also mitigated by limiting access to SLOPE-RBTP to only those users who need access to SLOPE-RBTP to perform their particular job functions.

⁵ Please see the PCQS (DHS/USCIS/PIA-010) PIA for additional information at www.dhs.gov/privacy.



Privacy Risk: Inaccurate information.

Mitigation: The accuracy of the information in SLOPE-RBTP is dependent on the accuracy of the data in the source systems. Prior to applying the adjudication rules, SLOPE-RBTP re-extracts CISCOR data to capture any data changes to ensure that the most accurate and up-to-date information is used to determine benefit eligibility.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

SLOPE-RBTP uses the PII from CIS, CBP TECS, FD-258 MF, and SNAP to adjudicate Form I-90 applications. SLOPE-RBTP links the PII to the applicant data on file in each of the systems to validate the applicant's information, determine benefit eligibility, and determine approval or denial of the applicant's request for a permanent resident replacement card.

SLOPE-RBTP also uses limited PII to produce internal management reports, which allow management teams to monitor and review workload and exceptions and completions. In addition, the data can be downloaded to a spreadsheet for further analysis. The type of data produced is statistical summary-level data on the performance of the system.

2.2 What types of tools are used to analyze data and what type of data may be produced?

SLOPE-RBTP does not utilize any tools to analyze data.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

SLOPE-RBTP does not use any commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Privacy Risk: Individuals who have legitimate access to PII could exceed their authority and use the data for unofficial purposes.

Mitigation: A warning banner is provided at all access points to deter unauthorized use of information. The banner warns authorized and unauthorized 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.



In addition, user access to SLOPE-RBTP is limited to USCIS personnel (including contractors and employees) who need the information to perform their job functions. Only USCIS users with proper permissions, roles, and security attributes are authorized to access the system for adjudication and technical purposes. Each user is obligated to adhere to and sign a user access agreement which outlines the appropriate rules of behavior tailored to SLOPE-RBTP. The system administrator is responsible for granting the appropriate level of access. Further, all USCIS employees are properly trained on the use of information in accordance with DHS policies, procedures, regulations, and guidance.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 What information is retained?

SLOPE-RBTP will retain all information extracted from the source systems identified in 1.2 and the final adjudication determination. The final adjudication determination is also loaded into the CLAIMS 3 LAN.

3.2 How long is information retained?

Retention periods for the SLOPE-RBTP source systems are listed below:

Interfacing System	Type	Disposition	Schedule #
CISCOR	Master File	Temporary. Delete/Destroy after each CLAIMS 3 LAN data refresh.	N1-566-08-14
CIS	Master File	Permanent. Beginning in 2014 and every five years thereafter, transfer a copy of extracted database covering files of persons born 100 years earlier. (For example, in 2014, transfer a copy of extracted database covering files of persons born between 1909 and 1914.)	N1-566-10-01
FD258	Master File	Temporary. Delete 10 years after last completed action.	N1-566-09-03
SNAP	Master File	Temporary. Delete/destroy 15 months from the last recorded action.	N1-566-08-19
CLAIMS 3 LAN	Master File	Temporary. Delete/Destroy 15 years after last completed action.	N1-566-08-12
CBP TECS SQ11	Master File	Temporary. Destroy when all administrative and investigative needs have expired.	N1-36-98-3 (CBP)



3.3 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?

No. NARA has not yet approved the retention schedule for SLOPE-RBTP. NARA has approved the retention schedules for USCIS source systems (see above).

3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Privacy Risk: Retaining data for a lengthy period of time.

Mitigation: All data is retained for the indicated periods to fulfill the business requirements of DHS. The time periods in the retention schedules are being carefully negotiated between USCIS and NARA to ensure that data is retained for the minimum time needed to process the application and make the information available for other USCIS benefits that might be sought by an applicant.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the Department of Homeland Security.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

NSC uses SLOPE-RBTP to automate the administration and adjudication of Form I-90 applications. Specifically, NSC uses SLOPE-RBTP to process these applications. SLOPE-RBTP does not share adjudication decisions with any organization internal to DHS. Adjudication determinations (accept or deny) are updated in CLAIMS 3 LAN through an electronic interface with SLOPE-RBTP or by adjudicators. Please see the CLAIMS 3 PIA⁶ for more details regarding its internal sharing and disclosure procedures.

4.2 How is the information transmitted or disclosed?

SLOPE-RBTP transmits data to authorized SLOPE-RBTP users securely within the USCIS intranet. Information is disclosed to authorized users on secure intranet web pages that identify issues with an application or identify applications that are likely candidates for receiving the legal permanent resident replacement card. SLOPE-RBTP electronically encrypts and transmits adjudication decision to CLAIMS 3 LAN. Additionally, the system generates reports on system performance that are available to

⁶ Available at http://www.dhs.gov/files/publications/gc_1279308495679.shtm



be viewed as web pages or downloaded into Microsoft Excel spreadsheets on an authorized user's workstation.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Privacy Risk: PII may be disclosed during data transmission from a designated DHS system to a separate designated DHS system.

Mitigation: SLOPE-RBTP securely transmits information in an encrypted manner as the entire USCIS Network is encrypted.

Privacy Risk: Web-based reports can be saved to users' workstations and printed.

Mitigation: Only users with authorized access (containing a SLOPE-RBTP user ID, password and a role within the system) to the SLOPE-RBTP system can access reports. Each user is obligated to adhere to and sign a user access agreement which outlines the appropriate rules of behavior tailored to SLOPE-RBTP. Additionally, training geared toward the proper use of SLOPE-RBTP is provided to each system user. Users are also required to take computer security and privacy training. Users that print and save reports destroy the sensitive data when its use is no longer required.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DHS which includes federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Not Applicable. SLOPE-RBTP does not share information with organizations external to DHS.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of DHS.

Not Applicable. SLOPE-RBTP does not share information with organizations external to DHS.



5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

Not Applicable. SLOPE-RBTP does not share information with organizations external to DHS.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Not Applicable. SLOPE-RBTP does not share information with organizations external to DHS.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Yes. Form I-90 applicants receive notice through this PIA, the Benefits Information System (BIS) System of Records Notice (DHS/USCIS-007), (September 29, 2008, 73 FR 56596).⁷ In addition, applicants are presented with a Privacy Act Statement and sign a release authorization for USCIS to release any information on the application as necessary to determine eligibility for benefits.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

Applicants are aware at the point of data collection of their rights to decline to provide requested information; however, it will result in the denial of the applicant's benefit request.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

No, the individual does not have the right to consent to particular uses of the information.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Privacy Risk: Individuals are unaware of the purposes for which their information is used.

⁷ Please see <http://edocket.access.gpo.gov/2008/E8-22802.htm> for additional information.



Mitigation: Requesters are given notice through the publication of the PIA and the BIS SORN. Applicants for USCIS benefits are also given notice in the form of a Privacy Act Statement that the information they are providing is being collected to determine whether they are eligible for immigration benefits.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

All requests for access must be made in writing. For those individuals subject to the Privacy Act, proper identification (i.e., picture identification and a notarized signature or submitted sworn statement under penalty of perjury) must be included. Requesters are required to provide their full name, date, place of birth, and return address.

Individuals may request access to their information by submitting a request to USCIS in writing at the following address:

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

7.2 What are the procedures for correcting inaccurate or erroneous information?

Requests to contest or amend information contained in SLOPE-RBTP should be submitted as discussed in Section 7.1. The requestor should clearly and concisely state the information being contested, the reason for contesting or amending it, and the proposed amendment. 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.

7.3 How are individuals notified of the procedures for correcting their information?

This PIA and the BIS SORN provide individuals with guidance regarding the procedures for correcting information.



7.4 If no formal redress is provided, what alternatives are available to the individual?

Applicants are provided opportunities for redress as previously discussed.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Privacy Risk: The privacy risk associated with respect to redress is that the right may be limited by Privacy Act exemptions or limited 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 applications process to correct information they have provided and to respond to information received from other sources. USCIS does not claim any Privacy Act access and amendment exemptions for this system so individuals may avail themselves to redress and appeals as stated in the DHS Privacy Act regulations found at 6 CFR § 5.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

The role-based administration grants access to SLOPE-RBTP on a need-to-know basis by determining what information the individual must access to complete daily job functions. Users are also required to obtain authorized logon credentials (i.e., DHS-issued user ID and password) and to establish role-based user account. In addition, USCIS employees and contractors must undergo federally approved clearance investigations and sign nondisclosure agreements in order to obtain the appropriate access levels.

8.2 Will Department contractors have access to the system?

Department contractors have access to SLOPE-RBTP, but access is limited to gathering additional information required for adjudicating the application.



8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

All employees and contractors are required to take the USCIS Privacy Training and Security Awareness training annually. This mandatory training offers sufficient guidance to individuals with privileges to access and use SLOPE-RBTP.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

The Certification & Accreditation (C&A) for SLOPE-RBTP is complete. SLOPE-RBTP has received the Authority to Operate (ATO) effective September 27, 2010 and will expire September 27, 2013.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

DHS security specification requires auditing capabilities that log user's activity to reduce the possibility of misuse and inappropriate dissemination of information. All users' activities, including any decisions, are tracked via an audit log within the SLOPE-RBTP system. SLOPE-RBTP does not allow a user to edit or change any data it received from other USCIS systems. SLOPE-RBTP is administered by USCIS Headquarters personnel who have the authority to administer the application. Users of the system must have an approved user ID, password, and a role within the system. Administrators at the HQ level have the authority to enable and disable users of the SLOPE-RBTP system.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Privacy Risk: Due to the sensitive nature of this information, there are inherent security risks (e.g., unauthorized access, use, and transmission/sharing) that require mitigation.

Mitigation: Access and security controls have been established to mitigate privacy risks associated with authorized and unauthorized users, namely misuse and inappropriate dissemination of data. Authorized users are given specific access rights. Audit trails are kept in order to track and identify unauthorized uses of system information. Data encryption is employed at every appropriate step to ensure that only those authorized to view the data may do so and that the data has not been compromised while in transit. Further, SLOPE-RBTP complies with DHS security guidelines, which provide hardening criteria for securing networks, computers, and computer services against attack and unauthorized information dissemination.



Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, biometrics, and other technology.

9.1 What type of project is the program or system?

SLOPE-RBTP is a rules and business process management system.

9.2 What stage of development is the system in and what project development lifecycle was used?

SLOPE-RBTP is a prototype and is currently in production. The Information Technology Lifecycle Management system development lifecycle was used to develop the SLOPE-RBTP application.

9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

The system does not employ technology that may raise privacy concerns. SLOPE-RBTP uses the information derived from the Form I-90 application and source systems to determine whether to issue a replacement legal permanent card.

Responsible Officials

Donald 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

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security



Appendix A – Data Elements SLOPE-RBTP collects during the review and Adjudication of the Form I-90 Applications

CISCOR

- A-Number
- Class of Admission
- First and Last Name
- Address
- Date of Birth
- Country of Birth
- Port of Entry
- Date of Entry
- Social Security Number
- Sex
- Mother's First Name
- Father's First Name
- Receipt Number
- Status
- Reason
- Receipt Date
- Biometrics Determination

CIS

- A-Number
- Class of Admission
- First and Last Name
- Country of Birth
- Date of Birth
- Port of Entry
- Date of Entry
- Mother's First Name
- Father's First Name
- File Control Number
- Naturalization Date
- Social Security number
- Sex
- Criminal History, if applicable
- Original Permanent Residence Date
- Card Expiration Date
- Card History (previous cards issued, date issued, status of cards)

FD-258

- A-Number
- First and Last Name
- Birthdate
- Fingerprint Date
- Response Code
- FBI Number

CBP TECS

- First and Last Name
- Date of Birth
- Search results (if there was a hit)

SNAP

- Receipt Number
- A-Number
- Appointment Date
- Scheduled Date

CLAIMS 3

- Card Type
- Transaction Type
- Adjudicator ID
- Receipt Number
- Date