



Privacy Impact Assessment

for the

Case and Activity Management for International Operations (CAMINO)

DHS Reference No. DHS/USCIS/PIA-051(a)

July 6, 2020



Homeland
Security



Abstract

U.S. Citizenship and Immigration Services (USCIS) oversees lawful immigration to the United States and is responsible for processing petitions, applications, and other requests for immigration benefits and requests. Executive Order 13780, “Protecting the Nation from Foreign Terrorist Entry into the United States” requires the U.S. Department of Homeland Security (DHS) to collect standard data on immigration forms and in case management systems. USCIS is now updating this Privacy Impact Assessment (PIA) to provide notice of USCIS updating certain immigration forms and associated systems, such as the Case and Activity Management for International Operations (CAMINO), in support of the Executive Order 13780. Upon publication of this PIA, CAMINO will collect additional biographic and social media data elements necessary for identity verification, vetting, public safety, and national security screening. Additionally, USCIS is updating this PIA to clarify that the entire Refugee, Asylum, and International Operations (RAIO) Directorate now uses CAMINO and to update appendices to include new source and interconnected systems. This PIA update evaluates the privacy risks and mitigations associated with these changes including the collection, use, and maintenance of additional personally identifiable information (PII).

Overview

The U.S. Citizenship and Immigration Services (USCIS) Refugee, Asylum, and International Operations Directorate (RAIO) is charged with advancing the USCIS mission in the international arena. USCIS RAIO offices are located both overseas and domestically.¹ RAIO provides subject matter expertise on immigration-related matters, grants various immigration and citizenship benefits, and ensures the integrity of the U.S. immigration system for its overseas customers.

RAIO staff adjudicate a wide variety of petitions, applications, and travel documents to overseas customers. In addition to assisting overseas applicants applying for travel documents to enter the United States, RAIO staff also assist:

- U.S. citizens, lawful permanent residents (LPR), asylees, and refugees who wish to bring relatives to the United States;
- Individuals who have been persecuted or fear persecution and wish to resettle in the United States;

¹ The RAIO workforce includes two main divisions: The International and Refugee Affairs Division (IRAD) encompasses seven International offices, a headquarters, and a Domestic Field Office; and the Asylum Division has 11 field offices, a sub-office, and a headquarters in Washington, D.C.



- Individuals who cannot immigrate to the United States for specific reasons and who wish to have those reasons waived; and
- Individuals who may qualify to enter the United States because they are recognized by U.S. law as being members of specific categories with a special need, such as widows or widowers of U.S. citizens.

CAMINO is a person-centric case management system used to administer, track, and adjudicate applications filed with or processed by USCIS RAIO offices under RAIO jurisdiction with an international nexus. RAIO staff use CAMINO to manage the following application adjudication process: (1) Receipting and Acceptance Processing; (2) General Adjudication Procedures; (3) Security Screening Checks; (4) Interview; (5) Decision Case Action; and (6) Post-Adjudication. This PIA update is focused on collecting standard biographic and social media data elements on immigration forms processed within CAMINO for identity verification, vetting, public safety, national security screening, and inspection conducted by DHS.

Reason for the PIA Update

Executive Order 13780, “Protecting the Nation from Foreign Terrorist Entry into the United States,” requires the implementation of uniform vetting standards and the proper collection of all information necessary for a rigorous evaluation of all grounds of inadmissibility or basis for the denial of immigration-related benefits.² The Executive Order requires DHS, specifically USCIS and U.S. Customs and Border Protection (CBP), and the Department of State (DOS) to collect standard data on immigration and foreign traveler forms and/or through information collection systems. This data will be collected from certain populations on applications for entrance into the United States or immigration-related benefits and is necessary for identity verification, vetting, public safety, national security screening, and inspection conducted by DHS.

In coordination with DHS, USCIS updated applications and petitions (collectively referred to as immigration request forms) to collect standard biographic and social media data elements from individuals on the following immigration benefit requests:

- Form N-400, *Application for Naturalization*
- Form I-131, *Application for Travel Document*
- Form I-192, *Application for Advance Permission to Enter as a Nonimmigrant*
- Form I-485, *Application to Register Permanent Residence or Adjust Status*
- Form I-589, *Application for Asylum and for Withholding of Removal*
- Form I-590, *Registration for Classification as a Refugee*
- Form I-730, *Refugee/Asylee Relative Petition*

² See 82 FR 13209 (March 9, 2017).



- Form I-751, *Petition to Remove Conditions on Residence*
- Form I-829, *Petition by Entrepreneur to Remove Conditions on Permanent Resident Status*

The standardized collection of information is necessary to comply with Section 5 of the Executive Order to establish screening and vetting standards and procedures to enable USCIS to assess an individual's eligibility to receive an immigration-related request from USCIS. This data collection is also used to validate an individual's identity, identify law enforcement or national security risks to the United States, and ultimately to determine whether to grant the immigration request.

USCIS is updating PIAs associated with the case management system responsible for processing the forms listed above.³ Of the listed forms, CAMINO is responsible for supporting the adjudicative actions for Forms I-131 and I-730.

Standard Information Collection Update

DHS published two public notices for the collection of biographic and social media information. The first notice covered approximately 15 biographical data elements deemed to be "high value" and critical for enhanced vetting, thereby creating a new baseline of uniform data collection. The second notice covered the collection of social media identifiers (e.g., handles; user names) and associated public social media platforms that applicants have used in the past five years.

Biographic Information

The Executive Order establishes a common set of key biographic data elements to be consistently collected across traveler screening and immigration-benefit forms. These data elements are: Name; Sex/Gender; Date of Birth; Place of Birth; Country(ies) of Citizenship; Country of Residence; Passport/ Travel Document or National ID; Telephone Number(s); Email address(es); U.S. Residence or Destination City and State; Foreign Address City and State; and U.S. Point of Contact Name and Telephone Number, if applicant is located outside of the United States. A majority of these data elements are commonly collected on USCIS immigration forms. To standardize collection of data in support of comprehensive and systematic vetting of immigration requestors, USCIS updated its forms to collect information that is not already collected, to include city/region of birth, Passport/Travel Document or National ID (Country of issuance; Issue date; Expiration date), foreign Address, and U.S. Point of Contact name and telephone number (if the individual is located outside of the United States).

³ These updated PIAs include DHS/USCIS/PIA-016 Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), and DHS/USCIS/PIA-056 USCIS Electronic Immigration System (USCIS ELIS), available at <https://www.dhs.gov/uscis-pias-and-sorns>.



Social Media Information

The Executive Order also mandates the collection of publicly available social media information to assist with identity verification. Social media may help distinguish individuals of concern from applicants whose information substantiates their eligibility for an immigration benefit. Social media can provide positive, confirmatory information to verify identity and support a benefit requestor's immigration request. It can also be used to identify potential deception, fraud, or previously unidentified national security or law enforcement concerns.

USCIS updated its immigration forms to collect social media identifiers (also known as usernames, identifiers, or "handles") and associated social media platforms used by an immigration requestor during the past five years for identity verification and national security screening and vetting purposes.⁴ USCIS will not collect social media passwords. USCIS personnel review publicly available information on social media platforms in a manner consistent with the privacy settings the applicant has chosen to adopt for those platforms. Only the information that the account holder has allowed to be shared publicly will be viewable by USCIS.

Privacy Impact Analysis

Authorities and Other Requirements

The legal authority to collect and use information, including Social Security number (SSN), does not change with this update. Section 103 of the Immigration and Nationality Act (INA) provides the legal authority for the administration and adjudication of immigration and non-immigration benefits.⁵

The collection, use, maintenance, and dissemination of information are covered under the following system of records notices (SORN):

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records⁶ covers the collection, use, and maintenance of applications and supplemental evidence, in addition to other information related to the individual as he or she passes through the immigration process;

⁴ Vetting, for purposes of immigration enforcement and border security, involves the review and evaluation of information associated to an individual to validate identity, identify potential threats, and identify issues related to fraud, misrepresentation, national security, border security, homeland security, public safety, or law enforcement interests of the United States.

⁵ 8 U.S.C. § 1103.

⁶ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (October 18, 2017), available at <https://www.dhs.gov/system-records-notice-sorn>.



- DHS/USCIS-018 Immigration Biometric and Background Check System of Records,⁷ which covers biometrics, background checks, and its results;
- DHS/USCIS-005 Inter-Country Adoptions Security,⁸ which covers the collection and use of adoption applications, decisional data, and associated fees for adjudication;
- DHS/USCIS-007 Benefits Information System,⁹ which covers the collection and use of immigrant and nonimmigrant benefit applications, decisional data, and associated fees for adjudication for adjudication;
- DHS/USCIS-010 Asylum Information and Pre-Screening System of Records,¹⁰ which 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 Relief Act¹¹ credible fear screening cases,¹² and reasonable fear screening cases;¹³ and
- DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records,¹⁴ which covers the collection and use of refugee applications.

This update does not change the Authority to Operate (ATO) for CAMINO. CAMINO is covered as a minor system under the Digital Innovation and Development – Information Technology (DID-IT) accreditation boundary. DID-IT completed the security assessment and authorization documentation in August 2013 and was accepted into the Ongoing Authorization program. CAMINO will have an ongoing ATO with no expiration date so long as CAMINO continues to operate in compliance with security and privacy requirements.

⁷ DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 FR 36950 (July 31, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁸ DHS/USCIS-005 Inter-Country Adoptions Security, 81 FR 78614 (November 8, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁹ DHS/USCIS-007 Benefits Information System, 84 FR 54622 (October 10, 2019), available at <https://www.dhs.gov/system-records-notices-sorns>.

¹⁰ DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, 80 FR 74781 (November 30, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

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.

¹⁴ DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, 81 FR 72075 (October 19, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.



The associated records schedules do not change with this update. USCIS continues to retain data within CAMINO for 25 years from the date of the last completed action in accordance with National Archives and Records Administration (NARA) retention schedule [N1-566-12-06]. Supplemental evidence submitted along with the application or provided through a Request for Evidence (RFE) is stored in the Alien File (A-File) [N1-566-08-11]. A-File records are permanent, whether hard copy or electronic. DHS transfers A-Files to the custody of NARA 100 years after the individual's date of birth.

This update impacts the Paperwork Reduction Act (PRA) requirements for CAMINO. The information stored within CAMINO is subject to the PRA and the burden is accounted for under the DHS PRA information collection efforts. The CAMINO impacted forms include:

- Form I-131, *Application for Travel Document* (OMB No. 1615-0013)
- Form I-730, *Refugee/Asylee Relative Petition* (OMB No. 1615-0037)

Characterization of the Information

USCIS continues to collect and maintain the information previously outlined in Section 2.0 of DHS/USCIS/PIA-051 CAMINO.¹⁵ Consistent with the requirements for uniform vetting standards described in Executive Order 13780, USCIS collects the following standard biographic and social media information from immigration request forms and ingests the data into CAMINO:

- Name
- Sex/Gender
- Date of Birth
- City/Region and Country of Birth
- Country/Countries of Citizenship
- Country of Residence
- Passport/Travel Document or National ID (e.g., Country of issuance, issue date, expiration date)
- Telephone Number(s)
- Email address(es)
- U.S. Address: Residence or Destination city
- U.S. Address: Residence or Destination state
- Foreign Address city
- Foreign Address state
- U.S. Point of Contact Name, if applicant is located outside of the United States
- U.S. Point of Contact Telephone Number, if applicant is located outside of the United States

¹⁵ See DHS/USCIS/PIA-051 CAMINO, available at <https://www.dhs.gov/uscis-pias-and-sorns>.



- Social media user identifications (also known as usernames, identifiers, or “handles”) and associated social media platforms

USCIS previously collected a vast majority of the data elements on USCIS immigration forms. However, USCIS is updating this PIA to identify the biographic and social media elements not previously collected on immigration forms or stored in CAMINO. The new information collected on these forms include: social media platform, social media identifier(s) used over the past five years, foreign address (city/state) and prior address history, Passport/Travel Document or National ID (country of issuance, issuance date and expiration date), and U.S. Point of Contact name and phone number if the individual is located outside of the United States.

This update does not impact the sources of information collected. USCIS continues to collect information directly from the immigration requestor and/or legal representative, and internal and external systems.

This update does not impact the use of information from commercial sources or publicly available data contained in non-social media internet sites. USCIS plans to continue to use information provided in the immigration request form to conduct general internet searches used as part of the benefit adjudication process by adjudicators, and search publicly available social media postings¹⁶ that are used by authorized Fraud Detection and National Security Directorate (FDNS) personnel trained to conduct social media reviews of publicly available information.¹⁷

This update has no impact on the accuracy of information received from the immigration requestor and/or legal representative. This collection of information is necessary to comply with Section 5 of the Executive Order 13780 to establish screening and vetting standards and procedures to enable USCIS to assess an individual’s eligibility to receive an immigration-related benefit from USCIS. This data collection also is used to validate an individual’s identity and to determine whether the individual poses a law enforcement or national security risk to the United States. This data collection is done so in the same manner as all other information collected from the immigration requestor and/or legal representative.

Privacy Risk: There is a risk that the information provided on the immigration form is inaccurate.

Mitigation: This risk is mitigated. USCIS relies on the accuracy of the information provided by the immigration requestor and/or legal representatives. Prior to submitting an immigration request form, requestors must certify on the respective forms that the information

¹⁶ Select USCIS personnel who seek to access, process, store, receive, or transmit PII obtained through the Operational Use of Social Media while conducting investigations or background checks are required to complete a Rules of Behavior (ROB) for the Operational Use of Social Media. These ROB's ensure that users are accountable for their actions on social media, are properly trained, and aware of the authorized use of social media sites.

¹⁷ See DHS/USCIS/PIA-013-01 FDNS Directorate, available at <https://www.dhs.gov/uscis-pias-and-sorns>.



submitted is true and correct to the best of the immigration requestor's knowledge and belief. USCIS presumes the information submitted is accurate and verifies the information against multiple sources during the review process.

USCIS also gives individuals opportunities during and after the completion of the immigration request process to correct information they have provided or received, and to respond to information received from external sources, including social media. If the information could lead to a denial of the immigration benefit and if it is information of which the benefit requestor is unaware, it would be provided to the benefit requestor in a Notice of Intent to Deny, during an interview, or in similar process. The benefit requestor will have an opportunity to review and respond.

Privacy Risk: There is a risk of over collection now that USCIS uniformly collects social media information as part of its determination with an immigration request.

Mitigation: This risk is mitigated. In coordination with DHS, USCIS updated immigration request forms to collect the standard biographic and social media data elements from individuals on the appropriate immigration benefit requests in support of existing USCIS vetting and adjudication programs. USCIS now collects social media user identifications (also known as usernames, identifiers, or "handles") and associated social media platforms used by the immigration requestor during the past five years on certain forms. USCIS is seeking this information, covering the previous five-year period, to assist with identity verification and for consistency with other federal entity data collections for certain immigration request forms. USCIS personnel review publicly available information on social media platforms in a manner consistent with the privacy settings the immigration requestor has chosen to adopt for those platforms. Only that information which the account holder has allowed to be shared publicly will be viewable by USCIS.

USCIS collection of social media information is not "mandatory" in the sense that a benefit request form will be denied or rejected based solely on the lack of a response. USCIS continues to adjudicate a form where social media data element information is not answered, but failure to provide the requested data may delay the final determination of an individual's eligibility for the requested benefit. USCIS requires the ability to consider that information as it may contradict or substantiate information provided to USCIS in connection with the immigration request.

Uses of the Information

The uses of information do not change as a result of this update as outlined in Section 3.0 of the DHS/USCIS/PIA-051 CAMINO. USCIS continues to use CAMINO to support and manage the administration and adjudication of certain immigration related requests. Specifically, USCIS uses the biographic and social media information for the following purposes:



Identity Verification

USCIS uses name, gender, date of birth, city/region/country of birth, country of citizenship, and social media information to confirm both an individual's identity as it relates to the submitted immigration request form and to search DHS component historic records. These biographic identifiers are also used internally by USCIS and screening partners to confirm or disprove an association between an immigration requestor and information of interest and the strength of that association in the context of the underlying information.

Identity Resolution

The current passport/travel/national identity document information (country of issuance, issue date, and expiration date) is a unique numeric identifier issued to a single individual that USCIS uses to confirm both a person's identity and to search DHS records. It is also used by USCIS and screening partners to find, confirm, or disprove an association between an applicant, to determine the strength of that association, or to provide other information about the person that may be important in the adjudication.

Contact Information

The following eight (8) data elements are used to provide official correspondence from USCIS to an immigration requestor:

- Telephone Number(s)
- Email address(es)
- U.S. Address: Residence or Destination city
- U.S. Address: Residence or Destination state
- Foreign Address city
- Foreign Address state
- U.S. Point of Contact Name, if applicant is located outside of the United States
- U.S. Point of Contact Telephone Number, if applicant is located outside of the United States

These data elements are also used as secondary data elements to confirm a subject's identity as it relates to the submitted benefit request forms and to component historic records. These data elements are also used internally by USCIS and screening partners to confirm or disprove an association between a benefit requestor and information of interest and the strength of that association in the context of the underlying information.

CAMINO continues not to use technology to conduct electronic searches, queries, or analyses to discover or locate a predictive pattern or anomaly.



CAMINO continues not to share information with DHS components. DHS component access and use does not change as a result of this update.

Notice

USCIS is providing general notice about the system changes through this PIA update. USCIS also continues to provide notice through the associated SORNs and through the Privacy Notices on the associated forms (both paper and electronic). Furthermore, DHS issued two notices in the Federal Register titled, (1) “Agency Information Collection Activities: Generic Clearance for the Collection of Certain Information on Immigration and Foreign Travel Forms,”¹⁸ and (2) “Agency Information Collection Activities: Generic Clearance for the Collection of Social Media Information on Immigration and Foreign Travel Forms”¹⁹ to notify the public of USCIS’ intent to update several immigration request forms to collect additional biographic and social media information, respectively.

Data Retention by the Project

The records schedule does not change with this update. USCIS continues to retain data within CAMINO for 25 years from the date of the last completed action in accordance with NARA retention schedule [N1-566-12-06]. Supplemental evidence submitted along with the application or provided through an RFE is stored in the A-File [N1-566-08-11]. A-File records are permanent, whether hard copy or electronic. DHS transfers A-Files to the custody of NARA 100 years after the individual’s date of birth.

Information Sharing

This update does not impact internal and external information sharing as outlined in CAMINO. There are no new privacy risks associated with information sharing.

Redress

This update does not impact how access, redress, and correction may be sought through USCIS. USCIS continues to provide individuals with access to their information through a Privacy Act or Freedom of Information Act (FOIA) request. Individuals not covered by the Privacy Act or Judicial Redress Act (JRA) still may obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. U.S. Citizens and Lawful Permanent Residents may also file a Privacy Act request to access their information. If an individual would like to file a Privacy Act or FOIA request to view his or her USCIS record, the request can be mailed to the following address:

¹⁸ See <https://www.federalregister.gov/documents/2020/02/10/2020-02613/agency-information-collection-activities-generic-clearance-for-the-collection-of-certain-information>.

¹⁹ See <https://www.federalregister.gov/documents/2019/09/04/2019-19021/agency-information-collection-activities-generic-clearance-for-the-collection-of-social-media>.



National Records Center
Freedom of Information Act/Privacy Act Program
P. O. Box 648010
Lee's Summit, MO 64064-8010

Persons not covered by the Privacy Act or JRA are not able to amend their records through FOIA. Should a non-U.S. person find inaccurate information in his or her record received through FOIA, he or she may visit a local USCIS Field Office to identify and request to amend inaccurate records with evidence.

Auditing and Accountability

This update does not impact auditing and accountability by implementing technical and security controls to limit access and mitigate privacy risks associated with unauthorized access and disclosure.

Responsible Official

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