



Privacy Impact Assessment Update
for the

USCIS Electronic Information System (USCIS ELIS)

DHS/USCIS/PIA-056(b)

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Contact Point

**Donald K. Hawkins
Privacy Officer**

**U.S. Citizenship and Immigration Services
(202) 272-8030**

Reviewing Official

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



Abstract

U.S. Citizenship and Immigration Services (USCIS) operates the USCIS Electronic Immigration System (USCIS ELIS), which is an internal case management system. USCIS ELIS is composed of microservices to assist with performing complex adjudicative and processing tasks. One microservice includes the TECS microservice, which interconnects with U.S. Customs and Border Protection (CBP) TECS (not an acronym) through USCIS ATLAS (not an acronym) to facilitate TECS Name Checks. Previously, TECS Name Checks results were exclusively stored in Fraud Detection and National Security Data System (FDNS-DS). USCIS plans to store TECS Name Checks results in the TECS Service Account (TECSSVC) and will be made available to USCIS adjudicators through a separate microservice called TECS by ELIS (TbE). USCIS is updating this PIA to evaluate the privacy risks and mitigations associated with the maintenance of results in TECSSVC, the use of TbE to view name check results, and TECS Name Checks being facilitated for immigration requests processed in other USCIS case management systems.

Overview

USCIS is the component within the Department of Homeland Security (DHS) that oversees lawful immigration to the United States. USCIS receives immigration requests from individuals seeking immigration and non-immigration benefits. Once a benefit request form is submitted to USCIS, a series of processing and adjudication actions occur, such as case receipt and intake, biometric collection appointment generation, case specific processing and management, automated background checks, interview appointment scheduling, final decision rendering, and production of the proof of benefit. One of the case management systems used to track and adjudicate certain immigration requests forms filed with USCIS is USCIS ELIS.¹ USCIS ELIS is an internal case management system composed of microservices to assist with performing complex adjudicative and processing tasks.²

As described in DHS/USCIS/PIA-056 USCIS ELIS, all individuals submitting immigration requests are subject to background, identity, and security checks to ensure eligibility for the requested benefit and to ensure that they do not pose a threat to public safety or to the national security of the United States.³ In particular, USCIS conducts a mandatory CBP TECS Name Check⁴ on all individuals over 14 years of age who file immigration requests. The TECS

¹ Please see Appendix B of the DHS/USCIS-056 USCIS ELIS to view the immigration forms processed in USCIS ELIS, available at www.dhs.gov/privacy.

² A microservice is an approach to application development in which a large application is built as a suite of modular services. Each module supports a specific business goal and uses a simple, well-defined interface to communicate with other sets of services.

³ See DHS/USCIS-056 USCIS ELIS, available at www.dhs.gov/privacy.

⁴ Maintained by CBP, TECS is an automated enforcement and inspection lookout system that combines information from multiple agencies, databases, and system interfaces to compile data relating to national security risks, public safety issues, current or past targets of investigations, and other law enforcement concerns. See DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing, available at



Name Check query consists of a name-based search to identify records of known and suspected terrorists, sex offenders, people who are public safety risks, and other individuals that may be of interest (e.g., individuals who have warrants issued against them, people involved in illegal gang activity) to the law enforcement community.

USCIS adjudicators relied on the TECS microservice to facilitate the mandatory name check on all immigration requests processed in USCIS ELIS. The TECS microservice interconnected with CBP TECS through USCIS ATLAS (not an acronym)⁵ to initiate the TECS Name Check query. The TECS microservice then sent the individual's full name and date of birth through ATLAS to CBP TECS, which in turn, queries CBP TECS to identify any derogatory information. Results were previously stored in FDNS-DS and made available through USCIS ELIS.⁶ This PIA focuses on updates to the CBP TECS Name Check process.

Reason for the PIA Update

USCIS launched the eProcessing initiative to eliminate the creation of new paper immigration records.⁷ USCIS is moving from a traditional paper-based environment to a digital environment in which the immigration related request filing, adjudication, and communication are all electronic. As USCIS moves towards a digital environment, USCIS is fundamentally shifting its immigration records management processes and technologies. USCIS has historically used large systems with siloed operational functions to perform its adjudicative and processing needs. As part of the eProcessing initiative, USCIS plans to leverage and integrate existing operational systems with new services in an effort to uniformly process immigration request forms.

USCIS plans to update the existing TECS Name Check process in an effort to standardize the systems used to facilitate the checks and store the results from CBP. USCIS plans to leverage the TECS microservice to facilitate the mandatory name check on all immigration requests for USCIS case management systems. TECS microservice will be used beyond USCIS ELIS and will support other USCIS case management systems (i.e., Computer Linked Application Information Management System (CLAIMS 3),⁸ Global (not an acronym),⁹ and Investor File Adjudication Case Tracker (INFACT).¹⁰ The TECS microservice will continue to interconnect with CBP TECS through USCIS ATLAS to initiate the name check against CBP TECS. The TECS microservice

www.dhs.gov/privacy.

⁵ ATLAS is a USICS-owned platform which automates and streamlines the screening of biographic and biometric information received from immigration benefit applicants. ATLAS is not an acronym. See DHS/USCIS/PIA-013(a) FDNS-DS, available at www.dhs.gov/privacy.

⁶ See DHS/USCIS/PIA-013 FDNS-DS, available at www.dhs.gov/privacy.

⁷ Immigration files currently in paper form will remain as such until an individual affirmatively requests an additional benefit or until the record is otherwise used in an administrative context.

⁸ See DHS/USCIS/PIA-016(a) Computer Linked Application Information System and Associated Systems (CLAIMS 3), available at www.dhs.gov/privacy.

⁹ See DHS/USCIS/PIA-027(a) Asylum Division, available at www.dhs.gov/privacy.

¹⁰ To be covered under the forthcoming Immigrant Investor Program PIA. INFACT is the system associated with the Immigrant Investor Program.



sends the individual's full name and date of birth through ATLAS to CBP TECS, which in turn, queries CBP TECS to identify any derogatory information. Full results, including the hit and not hit, will be stored in the TECS Service Account Database (TECSSVC), which is a separate database within the USCIS ELIS boundary, and accessible to USCIS adjudicators through an imbedded TECS by ELIS (TbE) icon within the case management system.

USCIS is updating DHS/USCISPIA-056 USCIS ELIS to evaluate the privacy risks and mitigations associated with the maintenance of results in TECSSVC, the launch of TbE to view name check results, and to facilitate TECS Name Checks for immigration requests processed in other USCIS case management systems.

Storage of Name Check Results

The full TECS Name Check results for cases processed in USCIS ELIS were previously stored in FDNS-DS and made available to USCIS adjudicators via USCIS ELIS through an interconnection. USCIS plans to store all name check results from CBP TECS in the TECSSVC. The TECSSVC database maintains the full TECS Name Check results in separate data tables. This is a common IT practice to segregate the data in separate schema and tables, thus preventing the risks associated with data co-mingling.

TECS by ELIS (TbE)

USCIS adjudicators use TbE to view the name check results stored in the TECSSVC database. TbE is a microservice that provides TECS Name Checks results for queries ran against CBP TECS. Through the TbE icon embedded within USCIS case management systems, adjudicators use TbE to search background check results using the Alien Number, Receipt Number, or first name, last name, and date of birth combinations only. TbE also offers Adjudicators the ability to:

- **Conduct manual name harvesting:** Name harvesting entails cross-checking USCIS records to identify additional names or dates of birth that could be pertinent to an applicant.
- **Conduct ad-hoc checks:** USCIS is required to run an ad-hoc check if a name has not been through a TECS check in the past 180 days.
- **Disposition National Crime Informational Center (NCIC)¹¹ and TECS Subject Lookout Search (SQ11)¹² records resulting from TECS Name Checks:** USCIS

¹¹ The NCIC database currently consists of 21 files. There are seven property files containing records of stolen articles, boats, guns, license plates, parts, securities, and vehicles. There are 14 persons files, including: Supervised Release; National Sex Offender Registry; Foreign Fugitive; Immigration Violator; Missing Person; Protection Order; Unidentified Person; Protective Interest; Gang; Known or Appropriately Suspected Terrorist; Wanted Person; Identity Theft; Violent Person; and National Instant Criminal Background Check System (NICS) Denied Transaction.

¹² The TECS Subject Lookout Search (TECS SQ11) is a biographic query for individuals who are the subject of interest by DHS.



adjudicators are required to resolve hits or refer the case to the Background Check Unit if there is a TECS hit associated with a case. USCIS adjudicators will disposition records if the information has no effect the eligibility of the immigration request being sought.

- **Upload resolution memos from Enterprise Correspondence Handling Online (ECHO)¹³ or create resolution memos within TbE:** The Resolution Memo is the formal documentation of the reconciliation of a relating hit. This is a mandatory action that must be completed before rendering a final decision.
- **Complete a Record of Inquiry TECS (ROIT) through TbE:** A ROIT is a required document that is completed to record the results of a manual TECS query.

Once cases are imported into the TECSSVC database, the information is viewable in TbE. Cases that have incomplete information cannot be uploaded into TbE.

Expanded TECS Name Check Services

TbE supports the TECS Name Check process for immigration requests managed in other case management systems. USCIS is implementing TbE as a way for other case management systems to access the same background check features available to USCIS adjudicators using USCIS ELIS. CLAIMS 3 is planned to be the first case management system to embed the TbE icon. INFAC and Global are the other case management systems scheduled for access to this service. USCIS is enhancing its internal case management systems by inserting a TbE icon enabling direct access to name check queries and results in TECSSVC. This icon streamlines and simplifies access to relevant TECS Name Check data without the USCIS adjudicator needing to separately access another system or file in support of the adjudication process.

To initiate an automatic TECS Name Check, the case management system sends limited biographic information to the TECSSVC database when a new case is created. TECSSVC, in turn, sends the query to TECS microservice to send to ATLAS. ATLAS queries CBP TECS through the Enterprise Service Bus (ESB)¹⁴ using first name, last name, and date of birth and provides real-time *Hit* (derogatory information) or *No Hit* results to the TECS microservice for viewing in TbE.¹⁵ The TECS microservice also sends the response (Hit or No Hit) to the appropriate case management system as confirmation that a TECS query was performed. The derogatory results associated with a query are not sent back to the case management system. The case management system creates a specific History Action Code (HAC) based on whether there was a match, but no further details are visible in the case management system. In order to view the full results, the user can click on the TbE icon within the case management system.

¹³ See DHS/USCIS/PIA-063 Benefit Decision and Output, available at www.dhs.gov/privacy.

¹⁴ See DHS/USCIS/PIA-008 Enterprise Service Bus (ESB), available at www.dhs.gov/privacy.

¹⁵ See DHS/USCIS/PIA-008(a) ESB 2, available at www.dhs.gov/privacy.



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.¹⁶

The following system of record notices (SORN) cover the collection, maintenance, and use of the information contained in USCIS ELIS:

- DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records,¹⁷ which covers individuals who petition for benefits under the INA, and includes petitioners, preparers, and attorneys;
- DHS/USCIS-007 Benefits Information System,¹⁸ which covers individuals who have filed applications or petitions for immigration benefits under INA; and
- DHS/USCIS-018 Immigration Biometric and Background Check,¹⁹ which covers the background checks that are performed.

The USCIS ELIS Security Plan was last updated on December 26, 2017. USCIS ELIS has been granted an authority to operate (ATO) under the USCIS Ongoing Authorization (OA) process. OA requires USCIS ELIS to be reviewed on a monthly basis and to maintain its security and privacy posture in order to retain its ATO.

USCIS is developing a retention schedule for the records stored in USCIS ELIS that is subject to final approval by the National Archives and Records Administration (NARA). USCIS is negotiating a proposed retention schedule that will allow USCIS to maintain records to support the adjudication of the immigration request, any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, and Freedom of Information Act and Privacy Act (FOIA/PA) matters.

Characterization of the Information

This update does not impact the characterization of information in USCIS ELIS. USCIS continues to query CBP TECS to facilitate name checks and continues to collect and maintain the TECS Name Check results outlined in Section 2.0 of the DHS/USCIS/PIA-056 USCIS ELIS, published in 2018. With this update, USCIS is introducing the TECS microservice, TECSSVC

¹⁶ 8 U.S.C. § 1103(a).

¹⁷ DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (Sept. 18, 2017).

¹⁸ DHS/USCIS-007 Benefits Information System, 81 FR 72069 (Oct. 19, 2016)

¹⁹ DHS/USCIS-018 Immigration Biometric and Background Check, 83 FR 36950 (July 31, 2018).



database, and TbE which supports the TECS Name Check process for immigration requests managed in other case management systems. The TECS microservice stores first name, last name, and date of birth combinations from other case managements systems to initiate a TECS Name Check query. The TECS microservice provides TECSSVC with the full results, including hit or no hit, for storage. The TECS microservice also sends the response (Hit or No Hit) to the appropriate case management system as confirmation that a TECS query was performed. USCIS adjudicators are able to view the full results in TECSSVC via the TbE icon embedded within the case management system.

Uses of the Information

This update does not impact the uses of information in USCIS ELIS, which continues to serve as a case management system that supports the processing of certain immigration requests. USCIS is leveraging the TECS microservice to facilitate the mandatory name check on all immigration requests for USCIS case management systems. The TECS microservice will be used beyond USCIS ELIS and will support other USCIS case management system (i.e., CLAIMS 3, INFACIT, and Global). The TECS microservice will continue to interconnect with CBP TECS through USCIS ATLAS to initiate the name check query against CBP TECS. The TECS microservice sends the individual's full name and date of birth through ATLAS to CBP TECS, which in turn queries CBP TECS to identify any derogatory information. Full results are stored in the TECSSVC database and are accessible to USCIS adjudicators through an imbedded TbE icon within the case management system. The TECS microservice also sends the response (i.e., Hit or No Hit) to the appropriate case management system as confirmation that a TECS query was performed.

In addition to serving as a viewer, TbE also provides the following functionality to case management systems:

- *Manual Name Harvesting and Ad-Hoc Queries:* USCIS adjudicators are able to manually initiate a TECS Name Check for individuals associated with a benefit request filing. TbE sends the requests through the ELIS TECS microservice to ATLAS. ATLAS then receives the request and facilitates the TECS Name Check for the associated case management system.
- *Documenting Results:* The names and dates of birth for all TECS Name Checks conducted are automatically populated on an electronic version of the ROIT document. USCIS personnel have the ability to annotate the results (no match, does not relate, or relates) of a TECS query. The ROIT will also be automatically populated with the date of a query and the identification of the USCIS personnel annotating the results of a query. If a system generated query was conducted and the result was not a match, the ROIT will be automatically updated with that result.



- *Documenting Resolutions:* Each hit that relates to an individual must be resolved and documented by a Resolution Memorandum. Electronic versions of Resolution Memorandums can be created in TbE or uploaded into TbE after being generated in the ECHO system.

Notice

USCIS is providing general notice through the publication of this PIA. Each benefit request form, regardless of whether it is paper or electronic, contains a Privacy Notice that provides notice to individuals about the collection, USCIS's authority to collect information, the purposes of data collection, routine uses of the information, and the consequences of declining to provide the requested information to USCIS. The forms also contain a provision by which an applicant authorizes USCIS to release any information received from the benefit requestor or beneficiary as needed to determine eligibility for benefits. Individuals also receive notice through this PIA, the DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking SORN, the DHS/USCIS-018 Immigration Biometric and Background Check SORN, and the DHS/USCIS-007 Benefits Information System SORN.

Data Retention by the project

USCIS is developing a retention schedule for the records stored in USCIS ELIS that is subject to final approval by NARA. USCIS is negotiating a proposed retention schedule that will allow USCIS to maintain records to support the adjudication of the immigration request, any follow-up inquiries or requests related to the application, including inquiries related to law enforcement, public safety, national security, and FOIA/PA matters.

Privacy Risk: There is a risk that information may be retained longer than is needed, which increases the risk of unauthorized access to the information in USCIS ELIS.

Mitigation: This risk is not mitigated. USCIS is developing a retention schedule for USCIS ELIS. The proposed NARA schedule will be consistent with the concept of retaining data only for as long as necessary to support USCIS's mission. Until USCIS completes a NARA-approved retention schedule, USCIS will maintain all records indefinitely and will not delete records until a retention schedule is approved by NARA in accordance with the Federal Records Act.

Information Sharing

This update does not impact internal and external information sharing as outlined in USCIS ELIS. USCIS continues to query CBP TECS to facilitate name checks and continues to collect and maintain the TECS Name Check results outlined in the DHS/USCIS/PIA-056 USCIS ELIS, published in 2018.



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 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:

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 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

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

Approval Signature

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

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