Refugee Case Processing and Security Vetting

DHS/USCIS/PIA-068(a)

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Abstract

The Refugee, Asylum, and International Operations (RAIO), Refugee Affairs Division of the U.S. Citizenship and Immigration Services (USCIS) adjudicates applications for refugee resettlement. The Refugee Affairs Division historically used the following information systems in support of its adjudication efforts: Department of State's (DOS) Worldwide Refugee Admissions Processing System (WRAPS); designated Refugee Affairs Division sites on the Enterprise Collaboration Network (ECN); Refugee Affairs Division Case Manager (RAD Case Manager); Case and Activity Management for International Operations (CAMINO); and R-TRACK. The Refugee Affairs Division is seeking to retire the aforementioned USCIS systems and consolidate the functionalities into RAD Global, operating in a cloud-based environment, to serve as the primary case management system for the administration of refugee cases. USCIS is publishing an update to this Privacy Impact Assessment (PIA) to describe the launch of RAD Global to support refugee case processing.

Overview

The U.S. Refugee Admissions Program (USRAP) is an interagency effort involving several governmental and non-governmental partners both overseas and in the United States. The mission of the USRAP is to resettle eligible refugees in the United States. DOS 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. USCIS and DOS collaborate to manage and operationalize the overseas component of the USRAP. DOS notifies USCIS when potentially eligible individuals are identified under the USRAP. Thereafter, USCIS conducts in person interviews overseas as part of the adjudication process.

The mission of the RAIO Directorate is to leverage its domestic and international presence to provide protection, humanitarian, and other immigration benefits and services throughout the world, while combating fraud and protecting national security. The RAIO Directorate administers both the refugee and asylum programs to provide protection to qualified individuals inside and outside of the United States who have suffered past persecution or have a well-founded fear of future persecution in their country of origin, as outlined under Section 208 of the Immigration and Nationality Act (INA), 8 U.S.C. § 1158, and 8 CFR 208. Within RAIO, there are two divisions: the Asylum Division and the Refugee Affairs Division.

Although DOS has overall management responsibility for the USRAP, the USCIS RAIO Directorate, Refugee Affairs Division is responsible for interviewing refugee applicants, receiving and reviewing results of all background checks, and adjudicating applications for refugee

resettlement. The Refugee Affairs Division has historically used the following separate IT systems to maintain the information necessary to process applications for refugee resettlement:[1]

1. DOS WRAPS, which is used for all refugee applicants processed for resettlement consideration to the United States.[2]
2. ECN,[3] an internal collaboration tool that was used to share case information within the Refugee Affairs Division among several different programmatic areas and division branches, track refugee adjudications, and temporarily store case data.
3. RAD Case Manager, which was used to track "No Decision" (NOD) cases,[4] which are placed on hold for further USCIS Headquarters review.
4. CAMINO,[5] which was used to facilitate the processing of immigration applications and petitions received or adjudicated by the former International Operations Division.
5. R-TRACK, which was used to allow Refugee Affairs Division employees to input, monitor, update, and communicate refugee case statuses and decisions.

USCIS Refugee Officers access all these systems separately, at various points during the adjudication process, in order to complete tasks related to refugee case processing, such as tracking case status, accessing relevant documents, and scheduling interviews. Managing cases through several separate systems has proven cumbersome and inefficient and USCIS is moving toward a more automated and centralized process.

Reason for the PIA Update

To streamline the processing of refugee applications, USCIS developed RAD Global.[6] RAD Global seeks to eventually consolidate the refugee processing into one centralized case management system and replace the previously used USCIS systems to support the Refugee Affairs Division within the RAIO Directorate. RAD Global is a secure, cloud-based, case management system designed to facilitate the processing of refugee applications received and/or

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[1] For more information on the systems used to process applications for refugee resettlement, *see* DHS/ALL/PIA-068 Refugee Case Processing and Security Vetting, *available at* www.dhs.gov/privacy.

[2] *See* the WRAPS PIA and SORN for more information on this system and the information it collects, uses, and maintains, *available at* https://www.state.gov/privacy.

[3] *See* DHS/ALL/PIA-059 Employee Collaboration Tools, *available at* www.dhs.gov/privacy. USRAP management of information was designed in accordance with DHS/ALL/PIA-059. USCIS is also working on a forthcoming PIA to discuss USCIS-specific ECN sites.

[4] NOD cases are refugee cases in which the officer placed the case on hold for additional review before final adjudication. RAD is responsible for resolution of NOD cases.

[5] *See* DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), *available at* www.dhs.gov/privacy.

[6] The Global platform was first used by USCIS to support the processing of asylum applications, and the Asylum Division now uses a system called Global for this purpose. USCIS is expanding its use of the Global platform to support the Refugee Affairs Division as it relates to processing refugee applications; it will use a system called RAD Global for processing refugee applications. RAD Global and Global are two unique and separate systems. The asylum and refugee data are not comingled. The user access is also separate to ensure an Asylum Officer does not inadvertently gain access to RAD Global, and vice versa.

adjudicated by overseas and domestic offices of USCIS. RAD Global will intake case data from WRAPS, help USCIS Refugee Officers coordinate the interview and decision process, help USCIS Refugee Officers adjudicate refugee cases, and make that data available in DOS WRAPS. The efficiencies provided by RAD Global will result in improved productivity and accuracy in adjudication decisions.

RAD Global will enhance the existing process for administering and adjudicating refugee cases by offering USCIS Refugee Officers ability to digitally adjudicate refugee cases. RAD Global will intake Form I-590 data from DOS so that USCIS Refugee Officers may interview and adjudicate pending cases. USCIS Refugee Officers will input interview and decision information, such as interview notes, biographic details, and final adjudicative decisions in RAD Global. Once a final decision has been made on a case, RAD Global will communicate that decision to DOS to complete processing. Throughout the process of adjudicating a refugee case, both RAD Global and DOS WRAPS may share updates pertinent to adjudication, such as updated applicant name or address information or status of security checks.

RAD Global will be implemented in an iterative approach using the agile methodology. Using the agile methodology, USCIS seeks to deploy RAD Global functionality in phases to replace certain aspects of the systems previously used. For example, for the first phase, USCIS launched RAD Global to eventually replace RAD Case Manager. RAD Case Manager was used to track NOD cases. NOD cases are cases in which a USCIS Refugee Officer was unable to make a final decision in the field office or Resettlement Support Center (RSC) and sent the case back for further review for several possible reasons. The primary storage for most NOD cases is in DOS WRAPS, but aspects of these cases are processed and tracked outside of DOS WRAPS and by USCIS in the systems listed above (i.e., ECN, RAD Case Manager, CAMINO, R-TRACK).

In the first phase of the implementation of RAD Global, USCIS will upload DOS WRAPS data into RAD Global. RAD Global will display a list of cases that require USCIS' further review. USCIS will conduct further review pursuant to RAIO standard operating procedures. After the additional review is complete, the user will update RAD Global and send the relevant information back to WRAPS. USCIS will also notify DOS whether a hold has been lifted.

In subsequent phases, USCIS plans to absorb CAMINO and other ECN functionality into RAD Global. For example, RAD Global will eventually be used to support case management functions of certain form types for the International Operations Division. RAD Global will also serve as a technical platform for routing certain types of background and security checks, including results of checks of intelligence community holdings, and receiving responses for the Refugee Affairs Division. In addition, RAD Global will become a case tracking tool allowing users to input, monitor, update, and communicate refugee case statuses and decisions. Furthermore, RAD Global will be able to accurately track workload statistics, case decisions, and officer performance to

eventually replace R-TRACK. Additional ECN functionality, such as case organization and collaboration will also be replaced by RAD Global.

USCIS plans to simultaneously use RAD Global in addition to the historical systems until RAD Global is fully operational. Once RAD Global is fully operational, CAMINO and the ECN sites will be decommissioned. If there are other functionalities added to RAD Global outside of the ones discussed here, USICIS will update this PIA.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases, there may be no changes and indicate as such.

Authorities and Other Requirements

The legal authority for the Refugee Affairs Division to collect information does not change with this update. The authority to collect information related to refugee admissions to the United States is set forth in Section 207 of the Immigration and Nationality Act (INA), as amended.[7]

The following system of records notices (SORN) continue to cover the collection, maintenance, and use of information by the Refugee Affairs Division for the purpose of refugee resettlement:

- The Alien File, Index, and National File Tracking SORN 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.[8] A-Files are created for individuals who are interviewed by a USCIS officer overseas.

- The Refugee Case Processing and Security Screening Information SORN covers the collection, use, maintenance, and dissemination of refugee data, to include application intake, biometric checks, interviews, and adjudication.[9]

- The Immigration Biometric and Background Check SORN covers background checks and background check results;[10] and

- The Department of State's Refugee Case Records SORN covers the collection of information from individuals who have applied for admission to the United States as refugees that is stored in WRAPS. Routine Use 1 of STATE-59 Refugee Case Records

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[7] 8 U.S.C. § 1157.
[8] *See* DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, 82 FR 43556 (September 18, 2017).
[9] *See* DHS/USCIS-017 Refugee Case Processing and Security Screening Information, 81 FR 72075 (October 19, 2016).
[10] *See* DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, 83 FR 36950 (July 31, 2018).

permits DOS to share information with USCIS to determine the eligibility and admissibility of individuals applying for admission to the United States as refugees or any other immigration benefit under U.S. law.[11]

RAD Global is covered as a minor system under the Digital Innovation Development – Information Technology (DID-IT) Amazon Web Services (AWS) accreditation boundary. DID-IT completed the security assessment and authorization documentation in August 2013 and was accepted into the Ongoing Authorization program. Ongoing Authorization requires DID-IT, including RAD Global, to be reviewed on a monthly basis and sustain its security and privacy posture in order to maintain its Authority to Operate.

The records schedule does not change with this update. While USCIS will treat the records in RAD Global as intermediary, the records will be transferred into WRAPS. Intermediary records fall under DAA-GRS2017-00030002 and identifies records to be "deleted upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later."[12] The GRS identifies intermediary records as temporary records. USCIS is working to identify the timeframe records should be deleted from RAD Global once it is confirmed that the complete record has been transferred to DOS WRAPS. DOS WRAPS serves as the source system for the records and DOS adheres to the WRAPS retention schedule [A-25-003].[13]

This update does not impact the Paperwork Reduction Act (PRA) requirements to support refugee resettlement. Collection of information for refugee resettlement is covered by the Paperwork Reduction Act, specifically, by OMB Control number 1115-0057 (Form I-590, *Registration for Classification as Refugee*); and OMB Control number 1615-0040 (Form I-765, *Application for Employment Authorization*).

Characterization of the Information

This update does not impact the collection of information for administering and adjudicating refugee cases. Although RAD Global will replace previously used USCIS systems, USCIS continues to collect and maintain the same information as outlined in Section 2.0 of the DHS/USCIS/PIA-068 Refugee Case Processing and Security Vetting, published on July 21, 2017.[14] There are no changes to the forms used by RAD. There are no additional risks to characterization of the information.

Uses of the Information

This update does not impact the use of information for administering and adjudicating refugee cases; however, RAD Global is replacing previously used USCIS systems. Therefore, the

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[11] *See* STATE-59 Refugee Case Records SORN, 77 FR 5865 (February 6, 2012).
[12] https://www.archives.gov/files/records-mgmt/grs/grs05-2.pdf
[13] https://foia.state.gov/_docs/RecordsDisposition/A-25.pdf
[14] *See* DHS/USCIS/PIA-068 Refugee Case Processing and Security Vetting, *available at* www.dhs.gov/privacy.

various functionalities and types of PII that were previously separated amongst several systems will be consolidated within RAD Global to serve as the primary case management system for the administration and adjudication of refugee cases. USCIS uses RAD Global to manage, control, and track the process of refugee applications received and/or adjudicated by overseas and domestic offices of USCIS. USCIS uses the information in RAD Global to initiate, facilitate, and track prescreening, during in-person eligibility interviews, and biometric and biographic checks, in order to determine eligibility for refugee resettlement in the United States. Finally, USCIS uses the information to generate statistical workload reports to assist with oversight of production and processing goals.

Privacy Risk: There is a risk of an unauthorized user gaining access to more personal information being stored now that RAD Global will be consolidating the information from CAMINO, R-TRACK, and RAD Case Manager in one centralized location.

Mitigation: This risk is mitigated. Users must request access to RAD Global through myAccess.[15] Access will be limited to USCIS Refugee Officers and those in their chain of command, as well as certain USCIS employees for metrics collection. The system administrator reviews the user's role in order to grant the appropriate permissions. The Refugee Affairs Division also reviews and approves all requests that are submitted. RAD Global is an internal application and not accessible to the public. USCIS Refugee Officers use RAD Global to assist them in the administration and adjudication of refugee cases.

Notice

USCIS is providing general notice to the public that USCIS will eventually retire CAMINO, R-TRACK, and RAD Case Manager and use RAD Global as the primary IT case management system for the administration and adjudication of refugee cases. USCIS continues to provide notice to individuals through a Privacy Notice in the associated forms and the associated SORNs. Additional information about refugee processing is also available on the USCIS webpage. There are no additional risks to notice.

Data Retention by the project

This update does not change the length of time data is retained in RAD Global. USCIS stores the physical documents and supplemental documentation in the Alien File (A-File) and processes refugee requests in the respective case management system. The A-File records are permanent, whether hard copy or electronic, until destroyed, according to the National Archives and Records Administration (NARA) schedule N1-566-08-11. USCIS transfers the A-Files to the custody of NARA 100 years after the individual's date of birth.

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[15] The MyAccess application provides support for access to USCIS systems. MyAccess allows users to request access to USCIS systems, approve access requests, and review users for each system.

While USCIS will treat the records in RAD Global as intermediary, the records will be transferred into WRAPS. Intermediary records fall under DAA-GRS2017-00030002 and identifies records to be "deleted upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later." The GRS identifies intermediary records as temporary records. USCIS is working to identify the timeframe records should be deleted from RAD Global once it is confirmed that the complete record has been transferred to DOS WRAPS. DOS WRAPS serves as the source system and DOS adheres to the WRAPS retention schedule [A-25-003]. WRAPS retains records online for five (5) years after the refugee's arrival in the United States or case inactivity, and then transfers records to offline storage. DOS retains records offline for ten (10) years. Records are deleted when fifteen (15) years old.

Privacy Risk: Without an approved retention schedule, there is a risk that information may be retained longer than necessary and may increase the potential of an unauthorized disclosure.

Mitigation: This risk is partially mitigated. Intermediary records fall under DAA-GRS2017-00030002 and identifies records to be "deleted upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later." The GRS identifies intermediary records as temporary records. USCIS is working to define the timeframe records should be deleted from RAD Global once it is confirmed that the complete record has been transferred to DOS WRAPS. The defined timeframe will be consistent with the concept of retaining data only for as long as necessary to support USCIS's mission.

Information Sharing

This update does not impact information sharing with internal or external entities. USCIS continues to share information with internal and external entities as outlined in DHS/USCIS/PIA-068 Refugee Case Processing and Security Vetting, published on July 21, 2017. There are no additional risks to information sharing. There are no plans for DOS employees to have access to RAD Global.

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:

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

USCIS ensures that practices stated in this PIA comply with federal, DHS, and USCIS standards, policies, and procedures, including standard operating procedures, rules of behavior, and auditing and accountability procedures. RAD Global is maintained in the AWS, which is a public cloud designed to meet a wide range of security and privacy requirements (*e.g.*, administrative, operational, and technical controls) that are used by USCIS to protect data in accordance with federal security guidelines.[16] Although RAD Global operates in a public cloud, it is separated from other public cloud customers. RAD Global operates in a Virtual Private Cloud, which is a private component to the public cloud. USCIS controls access to the systems within the cloud, not AWS. AWS is Federal Risk and Authorization Management Program (FedRAMP)- approved and authorized to host PII.[17] FedRAMP is a U.S. government-wide program that delivers a standard approach to the security assessment, authorization, and continuous monitoring for cloud services.

All cloud-based systems and service providers, including RAD Global, are added to the USCIS Federal Information Security Modernization Act (FISMA) inventory and are required to undergo a complete security assessment review to verify adherence to DHS security and privacy requirements. USCIS validates technical and security controls to preserve the confidentiality, integrity, and availability of the data during the security authorization process. These technical and security controls limit access to USCIS users and mitigates privacy risks associated with unauthorized access and disclosure to non-USCIS users. Further, 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. All user actions are tracked via audit logs to identify information by user identification, network terminal identification, date, time, and data accessed. All USCIS systems employ auditing measures and technical safeguards to prevent the misuse of data.

All USCIS employees with access to RAD Global complete annual mandatory privacy awareness and Information Security training. These trainings present Privacy Act responsibilities and policies regarding security, sharing, and safeguarding of official information and PII on USCIS

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[16] Public clouds are owned and operated by third-party service providers whereas private clouds are those that are built exclusively for an individual enterprise.
[17] *See* https://marketplace.fedramp.gov/#/product/aws-us-eastwest?status=Compliant&sort=productName.

systems. The trainings are updated as appropriate, and all USCIS employees are required to take these trainings annually.

Privacy Risk: There is a risk that RAD Global records can be accessed by unauthorized personnel since RAD Global resides in AWS, a public cloud.

Mitigation: This risk is mitigated. Although RAD Global operates in a public cloud, it is separated from other public cloud customers. RAD Global operates in a Virtual Private Cloud, which is a private component to the public cloud. USCIS controls access to the systems within the cloud, not AWS.

Responsible Official

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Approval Signature

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

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